

Roanoke City Public Schools
Above Ground Storage Tank Spill Prevention Procedures



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August 5, 2014

Reference: MVT.101.301

Mr. Jamie Bates
General Manager
Mountain Valley Transportation
5401 Barns Avenue, NW
Roanoke, VA 24019

Re: Mountain Valley Transportation - RCPS Bus Facility Revised Spill Prevention Control and Countermeasure Plan

Dear Jamie:

MMA Environmental is pleased to provide you with this revised final Spill Prevention Control and Countermeasure (SPCC) Plan for the Mountain Valley Transportation RCPS Bus Facility (the Facility) located at 5401 Barns Avenue, Roanoke, Virginia. This SPCC Plan has been prepared to meet the requirements of 40 CFR 112 and has been revised within the required four years from the initial plan date. You should sign the Management Approval section on page iv and the certification in **Appendix 1**.

MMA Environmental appreciates having the opportunity to work with you. Please feel free to contact me at (540) 985-9540 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott E. Perkins".

Scott E. Perkins, P.E.
Senior Consultant

Enclosure: SPCC Plan

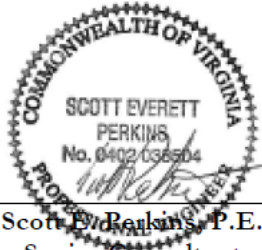
SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

for the

Mountain Valley Transportation - RCPS Bus Facility
5401 Barns Avenue, NW
Roanoke, Virginia 24019

Prepared by:

MMA Environmental
101 S. Jefferson Street, Second Floor
Roanoke, Virginia 24011



Scott E. Perkins, P.E.
Senior Consultant

August 5, 2014



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AND
COUNTERMEASURE (SPCC) PLAN**

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101 S. Jefferson Street, 2nd Floor
Roanoke, VA 24011**

August 5, 2014

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MANAGEMENT APPROVAL AND REVIEW [40 CFR 112.5, 40 CFR 112.7, 40 CFR 112.7(j)]

MANAGEMENT APPROVAL (40 CFR 112.5, 40 CFR 112.7, 40 CFR 112.7(j))

The Mountain Valley Transportation Facility (the Facility) is committed to the prevention of discharges of oil to navigable waters or the environment, and maintains the highest standards for spill prevention control and countermeasures through periodic review, updating and implementation of this Spill Prevention Control and Countermeasure (SPCC) Plan (the Plan). The Facility will provide the manpower, equipment and materials required to comply with all applicable local, state and federal regulation and expeditiously control and remove any quantity of oil discharged that may be harmful.

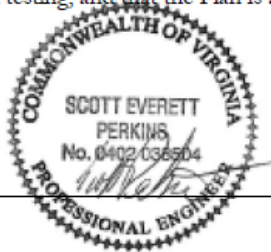
Authorized Facility Representative: _____

Signature: _____

Title: _____

Professional Engineer's Review [40 CFR 112.3(d)]

The undersigned registered Professional Engineer is familiar with the requirements of 40 CFR 112 and has supervised examination of the Facility. The undersigned registered Professional Engineer attests that this SPCC Plan has been prepared in accordance with good engineering practices including applicable industry standards, and in accordance with the requirements of Chapter 40 of the Code of Federal Regulations Part 112 (40 CFR 112); that procedures have been established for the required inspections and testing; and that the Plan is adequate for the Facility.



Signature: _____

Printed Name: Scott E. Perkins, P.E.

Title: Senior Consultant

Company: MMA Environmental

Date: August 4, 2014

P.E. Registration Number: 0402 038504

1.0 INTRODUCTION

1.1 PURPOSE AND REQUIREMENTS

This Spill Prevention Control and Countermeasure (SPCC) Plan has been prepared to document the procedures necessary to prevent and control releases of petroleum products stored in four aboveground storage tanks (ASTs) and one drum storage location at the Mountain Valley Transportation Facility (the Facility) located at 5401 Barns Avenue in Roanoke, Virginia (**Figure 1**). This SPCC Plan meets the requirements set forth in 40 CFR 112.7-8: Spill Prevention Control and Countermeasure Plans for Onshore Facilities.

1.2 PLAN MAINTENANCE AND UPDATE [40 CFR 112.5]

The General Manager or his designee is responsible for the update and maintenance of the SPCC Plan. A complete review and evaluation of the SPCC Plan is required once every five years from the certification date (the date the Facility becomes subject to this SPCC Plan). The Facility will amend the SPCC Plan when there is a change in the Facility design, construction, operation or maintenance that materially affects the Facility's potential to discharge oil. All changes and technical amendments will be certified by a registered Professional Engineer.

The SPCC Plan does not require approval by the United States Environmental Protection Agency (USEPA). SPCC Plans are not forwarded to the USEPA unless either of the following conditions apply: 1) the Facility discharges 1,000 gallons or more of oil in a single spill event; or 2) the Facility discharges oil in harmful quantities as defined in 40 CFR Part 110 into any waters of the United States in two spill events, reportable under the Federal Water Pollution Control Act, occurring within any 12 month period. In these instances, the SPCC Plan must be submitted to the USEPA within 60 days for review.

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1.3 USING THE PLAN

In addition to satisfying a regulatory requirement, this SPCC Plan should be a working document at the Facility. The Plan should be used frequently in the following ways:

- As a reference for oil storage and containment system information;
- As a tool for informing new employees and refreshing existing employees on practices for preventing and responding to spills;
- As a guide to periodic training programs for employees;
- As a guide to facility inspections; and
- As a resource during an emergency response.

1.4 SUBSTANTIAL HARM CRITERIA

The Facility does not meet the criteria required to demonstrate that a facility is at risk for causing substantial harm to the environment in the event of an oil spill. These requirements are set forth in 40 CFR Part 112.20(f)(1) and 40 CFR Part 112 Appendix C. The Facility has completed the certification that the Facility does not meet the substantial harm criteria as specified in 40 CFR Part 112 Appendix C (**Appendix 1**).

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2.0 FACILITY UPGRADES [40 CFR 112.7, 40 CFR 112.7(a)(1)]

Under 40 CFR Part 112.7, an owner or operator of a facility that is subject to these requirements may prepare an SPCC Plan that calls for additional facilities or procedures, methods, or equipment that are not yet fully operational provided that these items are described in separate paragraphs and the details of installation and operational start-up are explained.

As of the effective date of this Plan, this facility is fully compliant with the requirements of 40 CFR 112 and consequently no facility upgrades are necessary. The Facility's compliance

with these requirements is described in subsequent sections.

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3.0 FACILITY DESCRIPTION [40 CFR 112.7(a)(3)]

3.1 LOCATION AND USE

The Facility is located in a mixed commercial/residential area east of Interstate 581 and north of the Roanoke Regional Airport in Roanoke, Virginia on a parcel south of Barns Avenue. A site location map is shown on **Figure 1**. The Facility is designed and maintained in order to store and maintain school buses that serve Roanoke City Public Schools. The Facility was originally constructed in 2003. There have been no substantive site improvements since construction with the exception of the addition of a 10,000-gallon diesel above ground storage tank (AST) in 2009.

3.2 TANK AND DRUM DESCRIPTION [40 CFR 112.7(a)(3)(i), 40 CFR 112.7(a)(3)(iii), 40 CFR 112.8(c)(1,2,8)]

There are four petroleum AST's and one mobile refueler on-site. AST No. 1 is a 550-gallon single-walled steel used oil AST located in a storage room in the eastern corner of the Maintenance Building (**Figure 2**). It collects used oil from bus maintenance operations. AST No. 1 is equipped with proper venting to avoid over-pressurization, a visible level gauge and has a closed drainage port. Used oil is pumped to the AST from the main maintenance area via a pumping system that is equipped with an automatic shutoff device to avoid overfilling. Single-walled galvanized piping runs from AST No. 1 through the interior wall into the main maintenance area. This AST is elevated off of the ground to enable visual inspection of all sides of the tank, was reportedly installed in 2003 and the room in which it resides is bermed, thereby providing secondary containment.

AST No. 2 is a 550-gallon single-walled motor oil AST located in the same storage room in the eastern corner of the Maintenance Building as the used oil AST (**Figure 2**). It supplies motor oil for bus maintenance operations. AST No. 2 is equipped with proper venting to avoid over-pressurization, a visible level gauge and has a closed drainage port. Single-walled galvanized piping runs from AST No. 2 through the interior wall into the main maintenance area where motor oil is provided to mechanics. This AST is elevated off of the ground to enable visual inspection of all sides of the tank, was reportedly installed in 2003 and the

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room in which it resides is bermed, thereby providing secondary containment.

AST No. 3 is a 275-gallon single-walled steel transmission fluid AST located in the same storage room in the eastern corner of the Maintenance Building as the used oil AST (**Figure 2**). It supplies transmission fluid for bus maintenance operations. AST No. 3 is equipped with proper venting to avoid over-pressurization, a visible level gauge and has a closed drainage port. Single-walled galvanized piping runs from AST No. 3 through the interior wall into the main maintenance area where transmission fluid is provided to mechanics. This AST is elevated off of the ground to enable visual inspection of all sides of the tank, was reportedly installed in 2003 and the room in which it resides is bermed, thereby providing secondary containment.

AST No. 4 is a 10,000-gallon double-walled steel diesel AST located outdoors as shown in **Figure 2**. It supplies diesel fuel to school buses stored on-site. AST No. 4 is equipped with a high level alarm, an interstitial space alarm, an atmospheric and emergency vent per NFPA 30, an overfill bucket and a direct reading level gauge. The tank is connected via aboveground single-walled piping to an adjacent dispenser. General secondary containment is provided by the Facility's stormwater retention basin. This AST is elevated off of the ground to enable visual inspection of all sides of the tank and was installed in 2009.

Two 55-gallon drums of grease are located in the same storage room as AST Nos. 1 through

3. One 55-gallon drum of motor oil is also located in this room. These drums are stored directly on the concrete floor of the room and are provided with secondary containment by virtue of the room's bermed design.

A mobile refueling truck is typically parked in the open-sided building adjacent to AST No.

4. It is a single-walled 1,600-gallon steel refueling truck containing diesel fuel used to refuel buses. It is parked in a bermed storage area that is capable of containing approximately 3,400-gallons.

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3.3 OIL-FILLED EQUIPMENT [40 CFR 112.7(k)]

The Facility does not have any oil-filled equipment with greater than 55 gallons of capacity.

3.4 LOCAL SURFACE WATER

The nearest body of water to the Site is an unnamed tributary to the West Fork of Carvin Creek that runs along the northern boundary of the Facility. Carvin Creek leads to Deer Branch Creek and then to Tinker Creek, which discharges to the Roanoke River.

3.5 SITE DRAINAGE [40 CFR 112.8(b)(1-3)]

On-site runoff is collected through a series of drop inlets and conveyed to one stormwater retention basin immediately northeast of the Maintenance Building (**Figure 2**). This basin discharges to the unnamed tributary to the West Fork of Carvin Creek described in **Section**

3.4. The design and operational practices are such that all reasonable releases will be captured and managed prior to reaching surface water. Drainage from the interior diked storage area for AST Nos. 1 through 3 and the building containing the refueling truck is prohibited by the design of the diked rooms.

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4.0 SPILL PREVENTION AND RESPONSE

4.1 DISCHARGE PREVENTION (40 CFR 112.7(a)(3)(ii))

4.1.1 Operating Procedures

Facility employees are trained to implement spill prevention practices for work with and around oil sources. Facility personnel will use reasonable best management spill prevention to minimize the potential for a release of oil.

The following practices are implemented:

- Keep container lids securely fastened at all times;
- Do not leave portable containers unattended (outside);
- Return containers to their storage location after use;
- Use pads, drip pans and funnels when transferring petroleum products from a container;
- Protect oil sources from damage inflicted by moving equipment;
- Do not store oil sources near catch basins or floor drains; and
- Loading and unloading of petroleum products will be attended at all times.

4.1.2 Loading and Unloading Operations

4.1.2.1 AST Fill Operations

While the Facility does not have a loading/unloading rack (thereby eliminating the regulatory requirement for secondary containment on loading and unloading operations), there are several procedures that are followed to minimize the likelihood of a petroleum release during AST loading and unloading (for used oil) operations and to respond to releases that do occur. During AST fill operations, an SPCC Plan-trained Facility employee is required to be on-site. Spill response kits will be located in direct proximity to each AST and in the drum storage area as discussed in **Section 2.0**. These kits will be clearly labeled. Additional discharge prevention precautions are taken as specified in the Safe-Fill Procedure

(Appendix 2), and are followed during all tank filling operations. This Safe-Fill Procedure meets the requirements of 40 CFR 112.8(c)(8).

4.1.2.2 Bus Filling Procedures

The 10,000-gallon diesel AST is used to fill buses with fuel on an as-needed basis. Facility personnel that perform these refueling operations are trained in the following tasks:

- Operation of the dispenser and fuel management system;
- Location of the emergency shutoff valve; and
- Notification and response procedures in the event of a minor or major spill event (as defined in **Sections 4.2.3 and 4.2.4**, respectively).

4.1.2.3 Loading and Unloading Racks [40 CFR 112.7(h)]

The Facility does not have a loading or unloading rack as defined in the applicable regulations.

4.1.3 Tests and Inspections [40 CFR 112.7(e), 40 CFR 112.8(c)(6), 40 CFR 112.8(c)(10), 40 CFR 112.8(d)(4)]

The personnel at the Facility will perform testing, inspection and maintenance of all petroleum storage and handling equipment to keep it performing in an efficient and environmentally protective manner. The tests and inspections will be performed as discussed in the following subsections. These inspection procedures are compliant with the Steel Tank Institute Standard for the Inspection of Aboveground Storage Tanks STI SP001-006.

4.1.3.1 Inspecting ASTs and Drums

Facility personnel periodically observe the ASTs, associated piping, 55-gallon drums and the refueling truck during operating hours. The ASTs, 55-gallon drums and the oil absorbent booms on the curb inlets leading to the stormwater retention basin will be inspected monthly and the results will be recorded on the Monthly AST/Drum Inspection Form, as MVT.101.301 9 August 2014

included in **Appendix 3**. Annual inspections will also be performed on the ASTs and the results recorded in the Annual AST Inspection Form, as included in **Appendix 4**. The completed forms will be kept for at least three years in **Appendix 8** of this Plan, maintained by the General Manager. Inspections include observations of the exterior of the tanks and drums for signs of deterioration or spills (leaks), observations of the tank foundation and supports for signs of instability, and observations of the vent, fill and discharge pipes for signs of poor connections. Finally, the 10,000-gallon AST will be tested for integrity via a formal external inspection every 20 years as detailed in Section 7.0 of STI SP001-006. Records of integrity testing will be maintained for the life of the tank in a file maintained by the General Manager in **Appendix 8** of this Plan.

4.1.3.2 Tank/Drum Maintenance [40 CFR 112.8(c)(10)]

All petroleum storage tank and piping and 55-gallon drum problems will be immediately reported to the General Manager. Visible oil spills or leaks that cause a loss of oil from tank walls, piping or other components will be repaired or replaced as soon as possible to prevent the potential for a major spill from the source. This is especially important for sources located outside or near drains or catch basins that discharge to the environment. Records of AST repairs will be maintained in **Appendix 8** of this Plan.

4.1.4 Personnel and Training [40 CFR 112.7(f)(1,2,3)]

4.1.4.1 Training Requirements

The General Manager is the individual designated as accountable for discharge prevention and who reports to facility management.

The Facility will provide SPCC spill training for personnel involved with handling petroleum products. The General Manager will arrange for this training to be completed annually. An outline of this training is provided in **Appendix 5**.

The General Manager will maintain records of attendance at training sessions on the MVT.101.301 10 August 2014

Training Documentation Form provided in **Appendix 6**. This form will be maintained in **Appendix 8** of this Plan.

4.1.4.2 Documentation for Training

The annual SPCC training will be documented to include the instructor's name, course outline, date and duration of training, attendant's names and signatures, and corrective action list for areas in need of improvement, if any. This information will be filed and maintained for at least three years at the office of the General Manager as well as in **Appendix 8** of this Plan.

4.1.5 Security [40 CFR 112.7(g)(1,2,3,4)]

The Site is manned during normal business hours. An eight-foot chain link fence surrounds the Facility and meets the requirements of 40 CFR 112.7(g). The access gate to the Facility is locked during non-operating hours. The Site is well lit at night with security lighting. Tanks are always either operational or in a standby status for brief periods of time.

4.1.6 Piping [40 CFR 112.8(d)(3), 40 CFR 112.8(d)(5), 40 CFR 112.7(a)(2)]

Piping leading from the 550-gallon used oil and motor oil ASTs and the 275-gallon transmission fluid AST is single-walled but maintained entirely within the footprint of the Maintenance Building. Piping from between the 10,000-gallon AST and the dispenser is single-walled and aboveground but is protected by bollards. All piping is located such that it cannot be endangered by vehicles entering the Site. This design precludes the necessity to provide warning to drivers of vehicles as required under 40 CFR 112.8(d)(5). This deviation from 40 CFR 112.8(d)(5) and use of equivalent protection is allowable under the exemption provided in 40 CFR 112.7(a)(2). Pipe supports are designed and installed to minimize abrasion and corrosion and to allow for expansion and contraction.

4.1.7 Secondary Containment [40 CFR 112.7(a)(3)(iii), 40 CFR 112.7(c), 40 CFR 112.8(c)(2)]

Secondary containment is provided through a variety of passive and active means. AST MVT.101.301 11 August 2014

Nos. 1 through 3 and the 55-gallon drums are single-walled but are located in a room that has no drains but is completely bermed to provide containment for the largest sized tank (550-gallons). The refueling truck is parked in a bermed storage area. AST No. 4 has a double-walled design. Piping associated with AST Nos. 1 through 3 runs through the Maintenance Building. Any releases from the piping that are not captured through active containment measures described in **Section 4.2** would enter the sanitary sewer lines through floor grates and would be captured by the oil-water separator and thus prevented from passing off-site. Site personnel would then contract to have the oil-water separator pumped out. Piping associated with AST No. 4 that runs to the dispenser is provided with containment by virtue of the stormwater retention basin. This same stormwater retention basin will provide general secondary containment for any releases associated with refueling of AST Nos. 2 through 4, used oil removal from AST No. 1 and from bus refueling associated with AST No. 4 and the refueling truck. The effectiveness of the stormwater retention basin as a secondary containment method is increased by the maintenance of oil absorbent booms on the curb inlets leading to the basin as well as by active containment provided by site personnel responding to the fuel release as provided in **Section 4.2** of this Plan. These oil absorbent booms are inspected during the monthly and annual inspections

discussed in **Section 4.1.3**.

4.2 EMERGENCY RESPONSE [40 CFR 112.7(a)(3)(iii, iv, vi)), 40 CFR 112.7(a)(4), 40 CFR 112.7(a)(5)]

This section describes the cleanup response and protocols to follow in the event of an oil spill. State or federal laws prohibit the uncontrolled discharge of oil to groundwater, surface water or soil. It is imperative that action be taken to respond to a spill once it has occurred. In the event of an oil spill, depending on the volume and characteristics of the material released, the Facility has defined spill response as either a “Minor Spill Response” or “Major Spill Response” (“Spill Emergency”). A list of Emergency Contacts is included in **Section 4.2.4** below.

In the event of any spill, regardless of its size, the General Manager must be contacted immediately. His contact information is:

MVT.101.301 12 August 2014

Name: Jamie Bates, General Manager

Office Phone Number: (540)777-0101

Cell Phone Number: (540)728-0796

4.2.1 Spill Response Equipment

Spill response kits will be maintained adjacent to both the ASTs and drums in the Maintenance Shop as well as the 10,000-gallon diesel AST. They will be clearly marked and signs will be posted near the ASTs and drums to ensure personnel are aware of their location. The spill kits should contain spill booms to contain releases, absorbent pads to facilitate cleanup and other absorbent materials and be sufficient to respond to releases up to 55 gallons. The Facility will contact 911, the Virginia Department of Emergency Services and the National Response Center, as necessary, (see **Section 4.2.4**) to provide resources and manpower to respond to major releases that cannot be safely controlled and cleaned up using on-site equipment.

4.2.2 Likely Spill Scenarios [40 CFR 112.7(b)]

4.2.2.1 550-Gallon Used Oil or Motor Oil AST Refueling Release (AST No. 1/2)

A release from refueling lines during transfer to AST Nos. 1 or 2 would have the following characteristics:

Direction of Flow: Any release would flow over the exterior pavement underlying the refueling truck into the stormwater inlet along the curb and into the stormwater retention basin.

Rate of Flow: Up to 200 gallons per minute (GPM)

Total Quantity Potentially Released: 200 gallons

4.2.2.2 10,000-Gallon Diesel AST Refueling Release (AST No. 4)

A release from refueling lines during transfer to AST No. 4 would have the following

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characteristics:

Direction of Flow: Any release would flow over the exterior pavement underlying the refueling truck into the stormwater inlet along the curb and into the stormwater retention basin. The Facility maintains oil absorbent booms along this inlet to partially contain this type of release prior to entry into the stormwater retention basin.

Rate of Flow: Up to 200 gallons per minute (GPM)

Total Quantity Potentially Released: 1,500 gallons

4.2.2.3 Bus Refueling Release (AST No. 4 and refueling truck)

A release during refueling of a bus from AST No. 4 or from the refueling truck would have the following characteristics:

Direction of Flow: Any release would flow over the exterior pavement underlying the bus

into the stormwater inlet along the curb and into the stormwater retention basin. The Facility maintains oil absorbent booms along this inlet to completely contain this type of release prior to entry into the stormwater retention basin.

Rate of Flow: Up to 20 gallons per minute (GPM)

Total Quantity Potentially Released: 100 gallons

4.2.3 Minor Spill Response

A “Minor Spill Response” is defined as one that poses no significant harm to human health or the environment. These spills involve generally less than 25 gallons and can usually be cleaned up by Facility personnel. Other characteristics of a minor spill include the following:

- The spilled material is easily stopped or controlled at the time of the spill;
- The spill is localized;
- The spilled material does not reach surface water or groundwater;
- There is little danger to human health; and
- There is little danger of fire or explosion.

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In the event of a minor spill, the following guidelines will apply:

- Immediately notify the senior person on-site.
- Under the direction of the senior person on-site, contain the spill with spill response materials and equipment.
- Remove all visibly impacted soils.
- Place spill debris in properly labeled waste containers.
- Complete the **Spill Notification Form (Appendix 7)** and send it to the General Manager.

4.2.4 Major Spill Response (Spill Emergency) (40 CFR 112.7(a)(3)(vi))

A “Spill Emergency” is defined as one involving a spill that cannot be safely controlled or cleaned up and will typically involve greater than 25 gallons. Characteristics include any of the following:

- The spill is large enough to spread beyond the immediate spill area or greater than 25 gallons;
- The spilled material passes through the stormwater retention basin and into the adjacent creek (regardless of spill size);
- The spill requires special training and equipment to cleanup;
- The spilled material is dangerous to human health; or
- There is a danger of fire or explosion.

In the event of a spill emergency, the following guidelines will apply:

- Immediately notify the senior person on-site.
- All workers will immediately evacuate the spill site and move to a safe distance away from the spill.

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- A senior on-site person will call for medical assistance if workers are injured (no worker will engage in rescue operations unless they have been properly trained and equipped).
- Notification [40 CFR 112.7(a)(4)]: Complete as much of the Spill Notification Form located in **Appendix 7** as possible at this point of the response and then make the following notifications, as appropriate. Document the notifications on the Spill Notification Form.

➤ Immediately notify the local Fire Department at 911.

- For a spill of >25 gallons that does not cause a sheen or otherwise impacts surface water, a senior on-site person will immediately contact the Virginia Department of Emergency Management at (800) 468-8892.
- For a spill that causes a sheen or otherwise impacts surface water, a senior on-site person will immediately contact the Virginia Department of Emergency Management at (800) 468-8892 and the National Response Center at (800) 424-8802.
- A senior on-site person will contact the General Manager to provide details regarding the spill.
- The General Manager will coordinate cleanup and seek assistance from a cleanup contractor, as necessary.

4.2.5 Waste Disposal [40 CFR 112.7(a)(3)(v)]

4.2.5.1 Gasoline Spill

The Facility, as a Best Management Practice, assumes that gasoline-impacted spill response waste is hazardous due to its benzene content. Absorbents, impacted soil and other spill response wastes will be containerized in 55-gallon drums with firmly affixed lids. These drums will be marked as “Hazardous Waste - Gasoline Spill Response Waste” on a Hazardous Waste Label. If more than one 55-gallon drum has been filled, mark the Start Accumulation Date on the drum and store them in the Maintenance Building pending disposal as a Hazardous Waste within 180 days of waste generation (unless more than 2,200 pounds of waste has been generated, in which case the waste must be removed within 90

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days of generation). In either case, notify the General Manager immediately to coordinate VDEQ notification of hazardous waste generation status change.

4.2.5.2 Diesel, Oil or Used Oil Spill

The Facility has determined that this is a non-hazardous waste, unless it contains other wastes that would cause it to be hazardous (e.g., chlorinated solvents). Absorbents, impacted soil and other spill response wastes will be containerized in 55-gallon drums with firmly affixed lids. These drums will be marked as “Non-Hazardous Waste - Petroleum Spill Response Waste” on a Non-Hazardous Waste Label and placed in the Maintenance Building for temporary storage. Notify the General Manager immediately to confirm its status as non-hazardous and to coordinate disposal.

4.2.6 Spill Notification Forms

After making the appropriate phone calls and the spill is contained, a Spill Notification Form, included in **Appendix 7**, should be completed. This form will be maintained in **Appendix 8** of this Plan and a copy submitted to the General Manager. The Spill Notification Form includes a checklist to document the proper notification of state and federal agencies. The form will be filed by facility name and maintained as long as the Facility operates this facility.

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5.0 RECORDKEEPING [40 CFR 112.3(e), 40 CFR 112.7(e)]

The following records will be maintained in **Appendix 8** of the master copy of this Plan in the General Manager’s office for the intervals specified below.

- Spill Notification Forms - Kept for three years
- Training Documentation Forms - Kept for three years beyond the last date of employment
- AST Repair/Maintenance Records - Kept for the life of the AST
- Monthly AST/55-Gallon Drum Inspection Forms - Kept for three years

- 20-Year Integrity Testing Records - Kept for the life of the AST
- Copies of all written commitments of manpower and resources necessary to respond to remove any quantity of oil discharged that may be harmful – Maintain and update as long as the Facility is in operation.

FIGURES

FIGURE 1

Site Location Map

Mountain Valley Transportation

Bus Facility

5401 Barns Avenue

Roanoke, Virginia

Work Order No.: MVT.101.301

Drawn By / Date: TFL 08/31/09

Updated By / Date: GMH 08/05/14

Scale: See above

N

Topographic map for 5401 Barns Avenue, Roanoke, VA from <http://terraserver-usa.com> dated July 1, 1984.

SITE

FIGURE 2 – Site Map

Mountain Valley Transportation Bus Facility

5401 Barns Avenue

Roanoke, Virginia 24019

Work Order No.: MVT.101.301

Drawn By / Date: SEP 03/30/10

Scale: See Above

Updated By / Date: GMH 08/05/14

APPENDICES

Appendix 1

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Appendix 1

1

Appendix 1

Mountain Valley Transportation – RCPS Bus Facility

Substantial Harm Determination

Facility Name: Mountain Valley Transportation –RCPS Bus Facility

Address: 5401 Barns Avenue, Roanoke, VA

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 XX

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

Yes _____ No XX

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR 112, section 13, for availability) and the applicable Area Contingency Plan.

Yes _____ No XX

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 the Attachment C-III to 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake formula?

Yes _____ No XX

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

Yes _____ No XX

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Appendix 1

2

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 Date

Print Name/Title

Appendix 2

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Appendix 2

Appendix 2

Mountain Valley Transportation – RCPS Bus Facility

Safe-Fill Procedure

The below-listed procedures should be followed whenever conducting filling or removal operations at any AST located at the Facility. Note that this procedure does not apply to refueling of school buses from the 10,000-gallon AST but is intended to apply to bulk fueling operations.

- All receipts of fuel deliveries or used oil pickups should be authorized by a member of the Facility staff that has been trained in the Safe-Fill Procedures. This individual

should be present at all times during the refueling process.

- No fuel transfer operations should occur during periods of significant precipitation.
- Prior to beginning any fueling operations for any AST, a trained Facility staff member or the refueling vendor should read the volume gauge of the AST, to estimate the volume available in the AST, and confirm that the available capacity in the AST is greater than the volume of fuel to be transferred.
- The Facility staff should require the fuel transfer truck operator to chock the vehicle's wheels.
- Facility staff or the refueling vendor should visually inspect the truck for any leaks or other conditions that might lead to a fuel release.
- Facility staff trained in spill cleanup and containment procedures should be present during all transfer operations and should be close enough to detect when the audible high level alarm is tripped (for the 10,000-gallon AST) or code signal communication between the container gauger and the pumping station must be instituted (for other ASTs). This requirement is critical for the 550-gallon ASTs.
- Facility staff monitoring fuel transfer operations will maintain immediate access to a spill kit with the capacity to contain up to 50 gallons of oil released during transfer operations.
- In the event of a spill, initiate cleanup actions in accordance with the Facility Spill Response Procedures.
- Upon completing filling operations, the Facility staff should ensure that all fill and drain ports are properly secured.

Appendix 3

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Appendix 3

1

Appendix 3

Mountain Valley Transportation – RCPS Bus Facility

Monthly AST/Drum Inspection Form

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 1 (550-Gallon Used Oil AST)

Evidence of leaking into secondary containment? (e.g., on floor around tank).

Debris or fire hazard in containment?

Drain valves on AST operable and in a closed position?

Egress pathways clear and gates/doors operable?

Piping secured properly, free from evidence of leakage and in good

condition?

Tank liquid level gauge in good

condition?

Check if all tank openings are properly sealed.

Spill cleanup kit within site of AST?

Are there other conditions that should be addressed for continued safe

operation or that may affect the site

SPCC Plan?

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Appendix 3

2

Appendix 3

Mountain Valley Transportation – RCPS Bus Facility

Monthly AST/Drum Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 2 (550-Gallon Motor Oil AST)

Evidence of leaking into secondary containment? (e.g., on floor around tank or in double-wall interstitial space).

Debris or fire hazard in containment?

Drain valves operable and in a closed position?

Egress pathways clear and gates/doors operable?

Piping secured properly, free from evidence of leakage and in good condition?

Tank liquid level gauge in good condition?

Check if all tank openings are properly sealed.

Spill cleanup kit within site of AST?

Are there other conditions that should be addressed for continued safe

operation or that may affect the site

SPCC Plan?

MVT.101.301 08/05/14

Appendix 3

3

Appendix 3

Mountain Valley Transportation – RCPS Bus Facility

Monthly AST/Drum Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 3 (275-Gallon Transmission Fluid AST)

Evidence of leaking into secondary containment? (e.g., on floor around tank or in double-wall interstitial space).

Debris or fire hazard in containment?

Drain valves operable and in a closed position?

Egress pathways clear and gates/doors operable?

Tank liquid level gauge in good condition?

Check if all tank openings are properly sealed.

Spill cleanup kit within site of AST?

Are there other conditions that should be addressed for continued safe operation or that may affect the site

SPCC Plan?

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Appendix 3

4

Appendix 3

Mountain Valley Transportation – RCPS Bus Facility

Monthly AST/Drum Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 4 (10,000-Gallon Diesel AST)

Evidence of leaking into secondary containment or around AST? (e.g., on ground around tank or in double-wall interstitial space).

Debris or fire hazard near tank?

Drain valves operable and in a closed position?

Ladder and platform structure secure with no sign of severe corrosion or damage?

Piping secured properly, free from evidence of leakage and in good condition?

Tank liquid level gauge in good condition?

Check if all tank openings are properly sealed.

Spill cleanup kit within site of AST?

Booms over curb inlets in satisfactory condition and not in need of replacement?

Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?

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Appendix 3

5

**Appendix 3
Mountain Valley Transportation – RCPS Bus Facility
Monthly AST/Drum Inspection Procedure**

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

Mobile Refueling Truck (1,600-Gallon Diesel AST)

Evidence of leaking into secondary containment? (e.g., on floor around tank or in double-wall interstitial space).

Debris or fire hazard in containment?

Egress pathways clear and gates/doors operable?

Check if all tank openings are properly sealed.

Spill cleanup kit within site of AST?

Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?

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Appendix 3

6

Appendix 3

**Mountain Valley Transportation – RCPS Bus Facility
Monthly AST/Drum Inspection Procedure**

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

55-Gallon Drum Storage Area

Drums stored on pallets?

Evidence of leaking into secondary containment? (e.g., on floor around drums).

Debris or fire hazard in containment?

Check if all drum openings are properly sealed.

Noticeable container distortions, rust, buckling, denting or bulging?

Egress pathways clear and gates/doors operable?

Spill cleanup kit within site of drums?

Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?

Appendix 4

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Appendix 4

1

Appendix 4

**Mountain Valley Transportation – RCPS Bus Facility
Annual AST Inspection Form**

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 1 (550-Gallon Used Oil AST)

Containment structure in satisfactory condition?

Evidence of tank settlement?

Cracking or spalling of concrete pad?

Evidence of paint failure? (e.g., significant cracking, peeling or rusting)

Noticeable shell distortions, buckling,
denting or bulging?
Vents free of obstructions?
Emergency vent operable?
Has the tank liquid level sensing device
been tested to ensure proper operation?
Are tank grounding lines in good
condition?

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Appendix 4

2

Appendix 4
Mountain Valley Transportation – RCPS Bus Facility
Annual AST Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 2 (550-Gallon Motor Oil AST)

Containment structure in satisfactory
condition?

Evidence of tank settlement?

Cracking or spalling of concrete pad?

Evidence of paint failure? (e.g.,
significant cracking, peeling or rusting)

Noticeable shell distortions, buckling,
denting or bulging?

Vents free of obstructions?

Emergency vent operable?

Has the tank liquid level sensing device
been tested to ensure proper operation?

Are tank grounding lines in good
condition?

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Appendix 4

3

Appendix 4
Mountain Valley Transportation – RCPS Bus Facility
Annual AST Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 3 (275-Gallon Transmission Fluid AST)

Containment structure in satisfactory condition?

Evidence of tank settlement?

Cracking or spalling of concrete pad?

Evidence of paint failure? (e.g., significant cracking, peeling or rusting)

Noticeable shell distortions, buckling, denting or bulging?

Vents free of obstructions?

Emergency vent operable?

Has the tank liquid level sensing device been tested to ensure proper operation?

Are tank grounding lines in good condition?

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Appendix 4

4

Appendix 4

Mountain Valley Transportation – RCPS Bus Facility

Annual AST Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

AST No. 4 (10,000-Gallon Diesel AST)

Evidence of tank settlement?

Cracking or spalling of concrete pad?

Tank supports in satisfactory condition?

Evidence of paint failure? (e.g., significant cracking, peeling or rusting)

Noticeable shell distortions, buckling, denting or bulging?

Piping secured properly, free from evidence of leakage and in good condition?

Vents free of obstructions?

Emergency vent operable?

Has the tank liquid level sensing device been tested to ensure proper operation?

Is overfill prevention device in proper working condition?

Are tank grounding lines in good condition?

Booms over curb inlets in satisfactory condition and not in need of replacement?

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Appendix 4

5

Appendix 4

Mountain Valley Transportation – RCPS Bus Facility Annual AST Inspection Procedure

Date: _____ Completed By: _____

Inspection Item

√

If Ok

√

If Problem

Comments

(and Resolutions to Noted Problems)

Mobile Refueling Truck (1,600-Gallon Diesel AST)

Evidence of foundation settlement?

Cracking or spalling of concrete pad?

Evidence of paint failure? (e.g., significant cracking, peeling or rusting)

Noticeable shell distortions, buckling, denting or bulging?

Piping/hoses secured properly, free from evidence of leakage and in good condition?

Vents free of obstructions?

Emergency vent operable?

Appendix 5

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Appendix 5

Appendix 5

Mountain Valley Transportation – RCPS Bus Facility Initial and Annual SPCC Plan Training Outline

This safety training procedure is designed to provide the necessary training to all Facility employees involved with spill prevention and oil spill control procedures. The program is also intended to ensure the safety of inspectors conducting monthly inspections of the aboveground storage tanks (ASTs) and all other employees involved in operations described in the Facility Spill Response Procedures.

Section 1: Facility Description

1. Location and description of ASTs and drums.

Section 2: Spill Prevention

1. Review content of the SPCC Plan.

2. Review Safe-Fill Procedure provided in the SPCC Plan.

Section 3: Emergency Response Procedures

1. Identify all members potentially responsible for spill response activities.

2. Review the Facility Spill Response Procedures, including spill reporting requirements.

-3. Identify the use and location of all spill response equipment.

Section 4: Recent Releases

1. Identify and review any petroleum discharges in the previous 12 months to include reporting, cleanup and steps taken to prevent reoccurrences.

Appendix 6

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Appendix 6

Appendix 6

Mountain Valley Transportation – RCPS Bus Facility

Training Documentation Form

This form documents the following training sessions required by the Facility SPCC Plan:

Training Location: _____

Training Date: _____

Trainer: _____

The following individuals were present at the above circled training session. By signing this form, the individual affirms that he/she fully understands the contents of the procedure.

Name Title Signature Date

Appendix 7

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Appendix 7

Appendix 7

Mountain Valley Transportation – RCPS Bus Facility

Spill Notification Form

Part A: Basic Spill Data

Type of Spilled Substance: Notification Person:

Quantity Released:

Spill Date and Time:

Location of Spill: Discovery Date and Time:

Spill Duration:

Facility Name & Location:

Mountain Valley Transportation – RCPS Bus Facility

5401 Barns Avenue, NW

Roanoke, VA 24019

Release to: air water well soil

sewer containment

other _____

Owner / Company Name:

Mountain Valley Transportation – RCPS Bus Facility

Telephone:

Facility: __ (540) 777-0101 _____

Nature of spill and any environmental or health effects:

Injuries Fatalities Impacts to soil/surface water _____

Steps taken to clean up product and impacted soils/surface water:

Part B: Notification Checklist

Spill Type: Notification Date and

Time:

Name of Person that

Received Call:

Spill in excess of 25 gallons that doesn't reach surface water:

Virginia Department of Emergency Management
1-800-468-8892

Spill reaches surface water:

Virginia Department of Emergency Management
1-800-468-8892

National Response Center
1-800-424-8802

Approved Emergency Response Contractor*

* Emergency Response Contractor shall only be contacted by the senior site representative.

Send a copy of this form to the Facility Manager

Appendix 8

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Appendix 8

Appendix 8

Mountain Valley Transportation – RCPS Bus Facility

SPCC Plan Records

NOTE: The intent of this Appendix is to provide a single location for SPCC Plan related records in the Master SPCC Plan kept in the General Manager's office. Included are:

Spill Notification Forms - Kept for three years

Training Documentation Forms - Kept three years beyond last date of employment

AST Repair/Maintenance Records - Kept for life of AST

Monthly/Annual AST/55-Gallon Drum Inspection Forms - Kept for three years

Integrity Testing Records