Spill Prevention, Control, and Countermeasures Plan
HWMU, Parcel 3

Fort Wingate Depot Activity
McKinley County, New Mexico

November 14, 2013

Contract No. W912QR-04-D-0025
Delivery Order No. DM01

Prepared for:

U.S. Department of the Army
Corps of Engineers –

Albuquerque District
4101 Jefferson Plaza NE
Albuquerque, New Mexico 87109

Fort Worth District
819 Taylor Street
Fort Worth, Texas 76102

Prepared by:

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Omaha, Nebraska 68154

16170613

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14. ABSTRACT

The SPCC Plan details the location and contents of all oil storage containers larger than 55 gallons, prescribes inspection procedures and spill response protocols.

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DOCUMENT DISTRIBUTION LIST
SPCC PLAN
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Organization (Name)	Number of Printed Copies	Number of Electronic Copies
FWDA ARM (Micki Gonzales)	3	3
FWDA BEC (Mark Patterson)	1	1
FWDA EIMS (Pat Ryan)	0	1
USACE SPA (Steve Carpenter)	1	1
USACE SWF (Steve Smith)	1	1

Notes:
FWDA ARM = Fort Wingate Depot Activity Administrative Records Manager
FWDA BEC = Fort Wingate Depot Activity Base Realignment and Closure Environmental Coordinator
FWDA EIMS = Fort Wingate Depot Activity Environmental Information Management System
USACE SPA = U. S. Army Corps of Engineers – Albuquerque District
USACE SWF = U. S. Army Corps of Engineers – Fort Worth District

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List of Acronyms

AST	above ground storage tank
CFR	code of federal regulation
FWDA	Fort Wingate Depot Activity
HWMU	Hazardous Waste Management Unit
NM	New Mexico
NMED	New Mexico Environment Department
RA	Regional Administrator
SPCC	spill prevention control and countermeasures
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
URS	URS Group Inc.

URS Group Inc. (URS) has prepared this Spill Prevention Control and Countermeasure (SPCC) Plan for the removal action at the Hazardous Waste Management Unit (HWMU) at Fort Wingate Depot Activity (FWDA), McKinley County, New Mexico. This SPCC has been prepared by URS for United States Army Corps of Engineers (USACE) Albuquerque and Fort Worth Districts under Contract No. W912QR-04-D-0025, Delivery Order DM01. This SPCC presents the requirements applicable to FWDA (**Figure 1-1**). This plan was prepared in accordance with the general requirements of Title 40 of the Code of Federal Regulations (CFR) Part 112, Section 7 and the specific elements of 40 CFR § 112.8. FWDA is subject to the regulations of 40 CFR Part 112 because it has a total aboveground oil storage capacity greater than 1,320 gallons. The facility's total oil storage capacity is an estimated 4,127 gallons including the following containers with capacities of 55 gallons or greater:

- One 3,000-gallon steel aboveground storage tank (AST)
- One 300-gallon steel AST
- One 69-gallon integral generator tank
- One 129-gallon integral generator tank
- One 409-gallon integral generator tank
- Two 55-gallon drums of hydraulic fluid
- Two 55-gallon drums of waste oil

A copy of this plan shall be kept on-site and, upon request, made available for review by the United States Environmental Protection Agency (USEPA) Regional Administrator (RA) during normal working hours. The plan shall be submitted to the USEPA Region 6 and the New Mexico Environment Department (NMED) if either of the following occurs:

- The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or
- The facility discharges oil in quantities greater than 42 gallons in each of two spill events within any 12-month period.

Along with this Plan, if either of the above thresholds is reached, the following information shall also be provided to the USEPA Region 6 RA within 60 days:

- Facility name
- Name of individual submitting the information
- Facility location
- Maximum storage of the facility
- The corrective action(s) taken and countermeasures taken, including equipment repairs and replacements
- Description of the facility, including site map, topographical map, and flow diagram

- The cause of the spill
- Additional measures taken to minimize the potential of recurrence
- Any other information the RA may reasonably request that is pertinent to the plan or spill.

This Plan shall be reviewed at least once every five years and shall be amended within six months of the review to include any changes in SPCC policy or technology. This Plan shall also be updated and amended within six months of a significant change in facility design, construction, operation, or maintenance that materially affects the facility's potential for a discharge of oil into or near waterways or their tributaries.

The amendments shall be certified and stamped by a Professional Engineer, registered in the State of New Mexico and approved by USACE for implementation. Amendments shall be fully implemented as soon as possible, but not later than six months after such change occurs.

FWDA is located in northwestern New Mexico (**Figure 1-1**), approximately 8 miles east of Gallup, New Mexico. It is located in McKinley County, which is bisected by the Great Continental Divide. FWDA currently occupies approximately 24 square miles (15,273 acres) of land with facilities formerly used to operate a reserve storage facility providing for the care, preservation, and minor maintenance of assigned commodities–primarily conventional military munitions. FWDA is comprised of several parcels including Parcel 3, which consists of the current OB/OD Area and the HWMU.

Topographically, FWDA may be divided into three areas: 1) the rugged north-to-south trending ridge (the Hogback) along the western and the southwestern boundaries; 2) the northern hill slopes of the Zuni Mountain Range in the southern portion of the installation; and 3) the alluvial planes marked by bedrock remnants in the northern portion of the installation. The elevation at FWDA ranges from 6,500 feet (ft) above mean sea level (msl) to 8,250 ft above msl.

The installation is almost entirely surrounded by federally owned or administered lands, including both national forest and tribal lands. North and west of FWDA are Navajo tribal trust and allotted lands. The Bureau of Indian Affairs (BIA) administers the land east and south of Parcel 3. The land to the west is mostly undeveloped tribal trust and allotment land administered by the BIA, Navajo Nation, and individual Native American allottees.

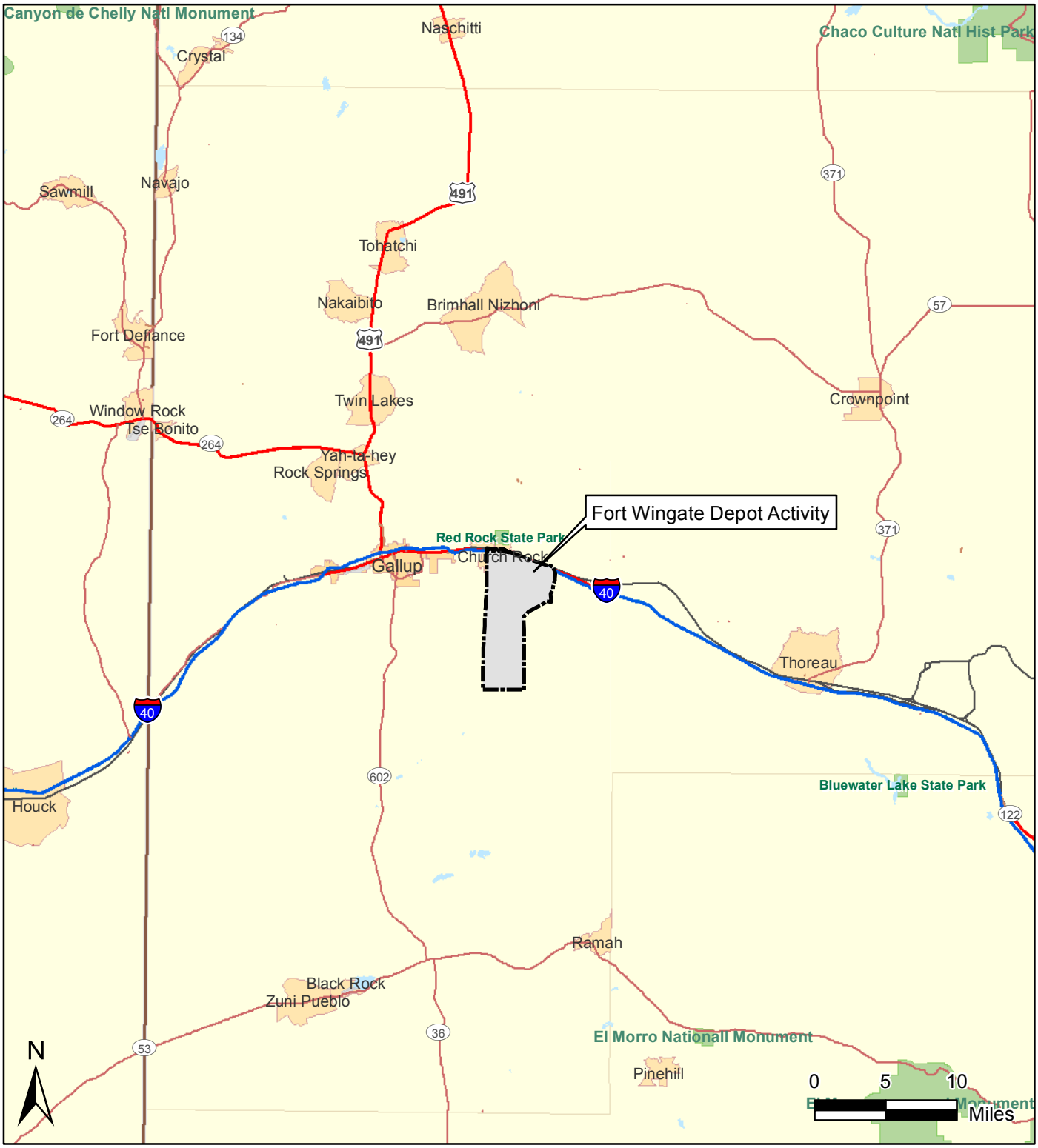
Table 1-1 summarizes the oil storage containers with capacities of 55 gallons or greater that are present at the facility. Total oil storage volume in containers is approximately 4,127gallons. **Figure 1-2** presents site layout and the location and contents of each fixed oil storage container with capacities of 55 gallons or greater.

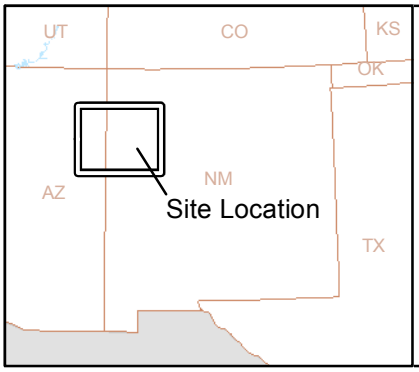
TABLE 1-1: OIL STORAGE CONTAINER INFORMATION
HAZARDOUS WASTE MANAGEMENT UNIT, PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Container ID/Description	Location	Volume (gallons)	Quantity	Contents	Container Construction
Fuel Oil #1	TFU (Parcel 3)	3,000	1	Diesel Fuel	Single-walled steel tank
Fuel Oil #2 (TFU Generator Tank)	TFU (Parcel 3)	300	1	Diesel Fuel	Single-walled steel tank
Generator #1 (HWMU – 40 kW)	HWMU (Parcel 3)	69	1	Diesel Fuel	Double-walled steel tank
Generator #2 (HWMU – 608 kW)	HWMU (Parcel 3)	409	1	Diesel Fuel	Double-walled steel tank
Generator #3 (HWMU – 400 kW)	HWMU (Parcel 3)	129	1	Diesel Fuel	Double-walled steel tank
Hydraulic Fluid	HWMU (Parcel 3)	55	2	Hydraulic Oil	55-gallon steel drum
Waste Oil	HWMU (Parcel 3)	55	2	Waste Oil	55-gallon steel drum

Notes:
HWMU – Hazardous Waste Management Unit
kW – kilowatt
TFU – Thermal Flashing Unit

1





Legend

Installation Boundary

Installation Location
Fort Wingate Depot Activity
McKinley County, New Mexico

Drawn By:	Date:	
JNC	3/27/2013	**Figure 1-1**
Checked By:	Project No:	
SM	16170613	

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300 gal. AST
Flashing Furnace
3000 gal. AST
Corrective Actions Management Unit
Hazardous Waste Management Unit
CRP10
CRP9
CRP8
CRP7
CRP6
CDC11
CDC5
CDC12
CDC4
CRP4
CRP5
CDC3
CDC10
CRP3
CDC9
CDC2
CDC8
Generator #1
CDC7
Generator #2
CDC6
CRP2
CDC1
2 -55 gal. drums of hydraulic fluid
Generator #3
2 -55 gal. drums of waste oil
CRP1
7300
7400
7500
7200
7600
7700
7800
N
0 500 1,000 2,000
Feet
Note:
AST = Above-ground Storage Tank
CDC = Current Demolition Crater
CRP = Current Residual Pile
Red Rock State Park
Gallup
Church Rock
602
Site Location
Legend
Installation Boundary
Site Boundary
Extent of Subsurface Waste
Arroyo
Fuel Tank
55 Gal. Drum
Flashing Furnace
Generator
Fence
20' Topographic Contour
100' Topographic Contour
Road

OB/OD Areas and the OB/OD Unit
Fort Wingate Depot Activity
McKinley County, New Mexico

Drawn By:	Date:	
JNC	10/15/2013	**Figure 1-2**
Checked By:	Project No:	
BP	16170613	

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2.1 40 CFR § 112.7 (A) GENERAL CONFORMANCE REQUIREMENTS

2.1.1 § 112.7 (a)(1)

FWDA is in conformance with the requirements listed in 40 CFR 112.7.

2.1.2 § 112.7(a)(2)

FWDA complies with all applicable requirements listed in 40 CFR 112.7 and does not deviate from paragraphs 112.7(g), 112.7(i), or the applicable requirements of 112.8.

2.1.3 § 112.7(a)(3)

The HWMU is located in Parcel 3 in the southern portion of the installation. Demilitarization of unserviceable, obsolete, or waste explosives, propellants, munitions, and munitions components was accomplished at the HWMU. Propellants, small arms, and bulk explosives were burned as a means of disposal. Explosive filled munitions were disposed of by detonation. Disposals by detonation were conducted within detonation craters that may have been tamped with an earthen cover to minimize fragmentation dispersal. Residual material and waste were placed around the HWMU, typically pushed onto or over the arroyo banks.

Currently the site, which has been declared an improved conventional munitions area, is unused, secured with fencing and has restricted access. The HWMU consists of the burning ground, 10 areas identified as Current Residue Piles and 12 open detonation craters.

A proposed schedule for the construction project identifying the key construction phases is provided below.

- Site preparation of erosion and sediment control measures
- Low-water crossing construction and sediment and debris removal from arroyo
- Corrective Action Management Unit (CAMU) construction
- Debris (including munitions and explosives of concern) and contaminated soil excavation, stockpiling and processing
- Transportation and disposal of hazardous waste
- Site restoration
- Removal of erosion and sediment control measures following final stabilization

Figure 1-2 presents site layout and the location and contents of each fixed oil storage container with capacities of 55 gallons or greater.

2.1.4 § 112.7(a)(3)(i)

Table 2-1 lists the type of oil in each fixed storage container and its capacity.

2.1.5 § 112.7(a)(3)(ii)

Outside contractors fill the ASTs, remove waste oil drums, and deliver hydraulic fluid drums. URS personnel shall be present to monitor the filling, emptying, and delivery operations. Specific information regarding containment systems, drainage controls, management, and communications is provided in the following sections.

2.1.6 § 112.7(a)(3)(iii)

Table 2-1 summarizes the containment system(s) and/or drainage controls associated with each container.

2.1.7 112.7(a)(3)(iv)

Discovery: The individual that discovers a release will immediately notify a member of the Pollution Prevention Team via radio communication or telephone (contact information is included as **Appendix B**). The Pollution Prevention Team will contact emergency services and a cleanup contractor, if required. The spill shall be stopped and contained by the appropriately trained personnel.

Response: The Pollution Prevention Team is responsible for oversight of spill response, cleanup, and waste disposal. The source of the spill will be stopped, if possible, by closing valves, turning off pumps etc. The spill will be contained by using sorbent materials in spill kits located throughout the facility.

Cleanup: Smaller spills will be cleaned up by URS personnel trained to complete the task. Larger spills may also be cleaned up by URS personnel trained to complete the task or local spill response contractors. Sorbents, solids and recovered material will be containerized in drums and labeled with appropriate waste labels for disposal. Spill response and cleanup procedures are included in Appendix D.

2.1.8 § 112.7(a)(3)(v)

Recovered materials (both discharged oil and wastes generated during cleanup) will be placed into steel drums and sealed. The drums will be labeled with contents and a licensed waste disposal contractor, capable of handling oil wastes, will be contacted to dispose of the recovered materials. Contact information for local waste disposal contractors is presented in **Appendix A**.

2.1.9 § 112.7(a)(3)(vi)

Contacts for the On Scene Incident Commander, the National Response Center, emergency response contractors, appropriate agencies, and other emergency services are provided in the **Appendix A** and **Appendix B**.

2.1.10 § 112.7(a)(4)

The Spill Incident Form, included as **Appendix E** to this plan, shall be completed as soon as possible after the discovery of and response to a spill. The form will be used to convey the necessary information to the USEPA Region 6 RA and other agencies and includes: address and phone of the facility, date and time of discharge, type of material discharged, estimates of the quantity discharged, source, affected media, cause of discharge, injuries, mitigation activities, need for evacuation and individuals/organizations that have been contacted.

2.1.11 § 112.7(a)(5)

General operating and response procedures are included in this Plan. **Appendices A** and **D** include emergency contacts and spill response protocol.

2.2 40 CFR § 112.7 (B) POTENTIAL FOR EQUIPMENT FAILURE

Table 2-2 summarizes the sources of a potential discharge and predicts the direction, flow rate, and quantity that could be discharged as a result of equipment failure.

2.3 40 CFR § 112.7 (C) APPROPRIATE CONTAINMENT AND/OR DIVERSIONARY STRUCTURES OR EQUIPMENT

2.3.1 § 112.7(c)(1)(i)

Fuel oil AST numbers 1 and 2 are single-walled steel tanks. The in-line fuel tanks of Generators 1 through 3 are double walled tanks. Each AST and generator filling area is contained by a berm and an impervious barrier or a catch basin, which will contain a spill from the tank or during loading operations. A portable pump will be used to remove any rainwater contained within the berm or spill basin.

2.3.2 § 112.7(c)(1)(ii)

The 55-gallon drums of hydraulic fluid and waste oil, located in the HWMU near the plant and other equipment, are equipped with metal containment basins/drip pans. The basins surrounding the drums are adequate for containing potential discharges.

2.3.3 § 112.7(c)(1)(iii)

Culverts, gutters, and other drainage systems are not used at the HWMU of FWDA.

2.3.4 § 112.7(c)(1)(iv)

Booms and other sorbent materials are standard elements of all spill kits. During tank filling and emptying operations diversionary booms shall be used to prevent oil from migrating outside containment areas.

2.3.5 § 112.7(c)(1)(v)

Diversion ponds are not present at FWDA.

2.3.6 § 112.7(c)(1)(vi)

Retention ponds are not present at FWDA.

2.3.7 § 112.7(c)(1)(vii)

Sorbent materials are standard elements of all spill kits used at the HWMU.

2.3.8 § 112.7(c)(2)

FWDA is classified as an onshore facility.

2.4 40 CFR § 112.7 (D) NON-PRACTICABLE REQUIREMENTS; INTEGRITY AND LEAK TESTING

The requirements of 40 CFR 112.7(c), 40 CFR 112.7(h)(1), 40 CFR 112.8(c)(2), 40 CFR 112.8(c)(11), are practicable for FWDA. Periodic non-destructive integrity tests are done on bulk storage containers.

2.5 40 CFR § 112.7 (E) INSPECTIONS AND RECORDS

Formal inspections of all ASTs shall be completed monthly by members of the SPCC Team. In accordance with Steel Tank Institute Standard SP001, a formal external inspection, including integrity testing, of the ASTs shall be completed every 20 years. Record of the inspections shall be documented and signed by the inspector. During the inspection all tanks, containment systems, valves, pipelines, and other devices are inspected.

The monthly inspection Standard Operating Procedure and Monthly Preventative Maintenance Inspection report form provided in **Appendix F** shall be filled out during each formal inspection,

signed by the inspector and the original copy kept on file with this Plan for a period of three years.

In addition to the formal inspections, contractor personnel informally inspect oil containers, piping, containment systems, and other related equipment on a daily basis. If any leaks, spills, or other problems are ever discovered, appropriate contractor personnel will be notified and the problem will be corrected in a timely manner.

Record of integrity tests of tanks will be kept on file for a period of three years.

2.6 40 CFR § 112.7 (F) TRAINING AND SPILL PREVENTION PROCEDURES

2.6.1 § 112.7(f)(1)

URS provides spill prevention and response and safety training to contractor personnel. The training program has been designed to improve safety awareness and to minimize the potential for oil spills by instructing personnel in the proper operation and maintenance of the equipment necessary to prevent the discharge of oil, discharge procedure protocols, and the contents of this Plan. Training includes the following:

- Spill Prevention
- Recognizing and Identifying a Spill
- Containment of Spilled Materials and Facility Drainage
- Stopping or Diverting Flow of Spilled Materials from Source
- Cleanup and Neutralization

Annual refresher training for spill response procedures is also conducted for the appropriate personnel. New employees are informed of spill prevention and response procedures during their initial safety training.

Any outside contractor involved in oil handling operations shall also be familiar with the specific discharge protection procedures used at the facility. At a minimum, these procedures include:

- Knowledge of the location and use of the spill kits
- Proper location to park the refueling or vacuum truck, as determined by URS
- Location of the contacts' phone numbers in case of an emergency

2.6.2 § 112.7(f)(2)

The Pollution Prevention Team is responsible for oil spill prevention at the facility and for coordinating spill response and prevention programs and activities. The Pollution Prevention Team is presented in **Appendix B**.

2.6.3 § 112.7(f)(3)

Spill prevention briefings shall be completed at least once per year. The briefings shall include all personnel who are required to have an understanding of this Plan. The briefing shall include, at a minimum, the following:

- A review of this SPCC Plan and any addenda to the Plan along with a review of applicable pollution control laws and regulations
- Discussions of any spill event, any oil storage equipment or component malfunction, and any new prevention measures implemented since the last spill prevention briefing
- Discussion of the location and use of all spill prevention equipment (spill kits, etc.)
- Discussion of the response procedures and contact list in case of an emergency
- Exercises in the use of any new spill prevention equipment

A record of each annual briefing/training shall be kept in the form of an attendance list (a blank list is included as **Appendix G**). The record shall be kept on file at the facility for a period of three years. New employees that are assigned spill prevention responsibilities shall receive facility specific SPCC training during their initial safety training.

2.7 40 CFR § 112.7 (G) SECURITY

2.7.1 § 112.7(g)

Chain-link fencing encloses FWDA and an additional chain-link fence encloses the HWMU to prevent unauthorized entry. All gates are locked when the areas are unattended.

All flow valves are located within the facility and are only accessible to contract personnel. These flow valves are kept in the closed position when in non-operating or non-standby mode.

The loading and unloading connections of all oil tanks are securely capped or blank-flanged when not in use or when in standby mode for an extended period of time.

2.8 40 CFR § 112.7 (H) TANK, TRUCK, AND RACK LOADING/UNLOADING

This section does not apply to the facility because there are no bulk oil loading/unloading racks on site.

2.9 40 CFR § 112.7 (I) FIELD CONSTRUCTED ASTS

This section does not apply to the facility, because there are no field constructed aboveground oil containers present on site.

2.10 40 CFR § 112.7(J) ADDITIONAL STANDARDS

Additional prevention standards are not applicable to the HWMU at FWDA. There are no more stringent requirements in New Mexico.

2.11 40 CFR § 112.7(K) QUALIFIED OIL FILLED OPERATIONAL EQUIPMENT

2.11.1 § 112.7(k)(1)

The HWMU at FWDA does not have qualified oil-filled operational equipment on site.

2.11.2 § 112.7(k)(2)

This section is not applicable because the HWMU at FWDA does not have qualified oil-filled operational equipment on site .

2.11.3 § 112.7(k)(2)(i)

This section is not applicable because the HWMU at FWDA does not have qualified oil-filled operational equipment on site.

2.11.4 § 112.7(k)(2)(ii)(A)

This section is not applicable because the HWMU at FWDA does not have qualified oil-filled operational equipment on site.

2.11.5 § 112.7(k)(2)(i)

FWDA and URS will commit the necessary manpower, equipment, and materials required to expeditiously control any quantity of oil discharged that may be harmful. A written commitment is included in the Management Approval Statement located in the front of this Plan.

TABLE 2-1: OIL STORAGE CONTAINER CAPACITY, CONTENTS, AND DESCRIPTION OF CONTAINMENT/DRAINAGE SYSTEMS
HWMU, PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Container ID/Description	Type of Oil	Volume (gallons)	Containment and/or Drainage System
Fuel Oil #1	Diesel Fuel	3,000	single-walled tank, berm area with impervious barrier has portable pump for rainwater removal; spill kit
Fuel Oil #2 (TFU Generator Tank)	Diesel Fuel	300	Single-walled tank, plastic catch basin has portable pump for rainwater removal; spill kit
Generator #1 (HWMU – 40 kW)	Diesel Fuel	69	in-line double-walled tank; berm area with impervious barrier has portable pump for rainwater removal; spill kit
Generator #2 (HWMU – 608 kW)	Diesel Fuel	409	in-line double-walled tank; berm area with impervious barrier has portable pump for rainwater removal; spill kit
Generator #3 (HWMU – 400 kW)	Diesel Fuel	129	in-line double-walled tank; berm area with impervious barrier has portable pump for rainwater removal; spill kit
Hydraulic Fluid	Hydraulic Oil	2@55	Plastic catch basins, spill kit
Waste Oil	Waste Oil	2@55	Plastic catch basins, spill kit

Notes:
HWMU – Hazardous Waste Management Unit
kW – kilowatt
TFU – Thermal Flashing Unit

1

TABLE 2-2: POTENTIAL SPILL SOURCES
HWMU, PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Container ID	Type of Failure	Volume Released (gallons)	Rate of Release (gallons/minute)	Direction of Spill
Fuel Oil #1	Partial or complete rupture	Up to 3,000	Up to 300	In berm
	Tank spill or overfill	Up to 100	Up to 45	In berm
	Leak from tank truck	Up to 100	Up to 5	In berm
Fuel Oil #2 (TFU Generator Tank)	Partial or complete rupture	Up to 300	Up to 30	In catch basin
	Tank spill or overfill	Up to 5	Up to 45	In catch basin
	Leak from tank truck or fill hose	Up to 5	Up to 5	In catch basin

2

TABLE 2-2: POTENTIAL SPILL SOURCES
HWMU, PARCEL 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Container ID	Type of Failure	Volume Released (gallons)	Rate of Release (gallons/minute)	Direction of Spill
Generator #1 (HWMU – 40 kW)	Partial or complete rupture	Up to	Up to 300	In berm
	Tank spill or overfill	Up to 10	Up to 45	In berm
	Leak from tank truck	Up to 10	Up to 5	In berm
Generator #2 (HWMU – 608 kW)	Partial or complete rupture	Up to 69	Up to 5	In berm
	Tank spill or overfill	Up to 5	Up to 1	In berm
	Leak from tank truck	Up to 5	Up to 1	In berm
Generator #3 (HWMU – 400 kW)	Partial or complete rupture	Up to 109	Up to 10	In berm
	Tank spill or overfill	Up to 10	Up to 1	In berm
	Leak from tank truck	Up to 10	Up to 1	In berm
Hydraulic Fluid	Partial or complete rupture (delivery)	Up to 110 (2X55)	Up to 18	On ground or in catch basin
	Partial or complete rupture (use)	Up to 110 (2X55)	Up to 18	In catch basin
Waste Oil	Partial or complete rupture (delivery)	Up to 110 (2X55)	Up to 18	On ground or in catch basin
	Partial or complete rupture (use)	Up to 110 (2X55)	Up to 18	In catch basin

Notes:
HWMU – Hazardous Waste Management Unit
kW – kilowatt
TFU – Thermal Flashing Unit

3.1 40 CFR § 112.8 (A) GENERAL CONFORMANCE REQUIREMENTS

The general requirements listed in 40 CFR § 112.7 have been as described in Section 2 of this Plan.

3.2 40 CFR § 112.8 (B) FACILITY DRAINAGE

3.2.1 § 112.8(b)(1)

Diked storage areas at the facility that require draining include the bermed area around the 3,000-gallon single-walled AST and each generator with in-line fuel tanks (Generator #1, Generator #2, and Generator #3). The catch basins for the 55-gallon drums of waste oil, 55-gallon drums of hydraulic oil, and the 300-gallon AST at the TFU also require draining when rainwater or oil have accumulated. Drainage of the diked areas and the catch basins is completed with a portable pump. Prior to discharge of accumulated precipitation, the water is inspected for sheen or other signs of contamination. Contaminated fluids are containerized, characterized, and properly shipped to a treatment facility.

3.2.2 § 112.8(b)(2)

All retained rainwater is inspected for sheen or other signs of contamination prior to discharge to the facility drainage system.

3.2.3 § 112.8(b)(3)

Since there is no potential for spills outside of the containment walls of the storage areas, special drainage systems are not required within the HWMU of FWDA.

3.2.4 § 112.8(b)(4)

The HWMU does not have any ditches; therefore, diversion of ditches is not possible. However, in accordance with the approved Storm Water Pollution Prevention Plan, silt fence or straw bales will be placed at the top of arroyo banks within the disturbed areas of the HWMU until permanent stabilization can be established.

3.2.5 § 112.8(b)(5)

Drainage waters are not treated at the HWMU of FWDA.

3.3 40 CFR § 112.8 (C) BULK STORAGE TANKS

3.3.1 § 112.8(c)(1)

All storage containers associated with the HWMU of FWDA are constructed of either steel or plastic. Both materials are compatible with the associated storage container contents at the temperature and pressure conditions of storage.

3.3.2 § 112.8(c)(2)

The 3,000-gallon and the 300-gallon ASTs are single-walled steel tanks. Each AST, generator, and filling area is contained by a berm and an impervious barrier or catch basin, which will contain a spill from the tank or during loading operations. A portable pump is used for the removal of rainwater located within each berm.

The 55-gallon drums of hydraulic fluid and waste oil, located in the HWMU near the plant and other equipment, are equipped with metal or plastic containment basins/drip pans. The basins surrounding the drums are adequate for containing potential discharges.

In addition, sorbent materials and booms are standard elements of all spill kits present throughout the HWMU of FWDA.

3.3.3 §112.8(c)(3)(i)

Drainage valves from all secondary containment exposed to precipitation are kept normally closed at all times that drainage of containment area is not needed. Portable pumps may be used to drain secondary containment.

3.3.4 §112.8(c)(3)(ii)

Storm water retained within secondary containment shall be inspected for sheen or other evidence of contamination prior to discharge.

3.3.5 §112.8(c)(3)(iii)

Secondary containment must be drained of precipitation. Drain valves shall be opened (if drain valves are used) to drain containment area and immediately closed when draining is complete. Portable pumps may be used to drain secondary containment of precipitation if drain valves are not present. URS or FWDA employees shall supervise the operation.

3.3.6 §112.8(c)(3)(iv)

Whenever a containment berm or catch basin is emptied the following information shall be recorded in a field logbook: date, time, duration of drainage, gallons transported, and personnel supervising drainage.

3.3.7 § 112.8(c)(4)

This section does not apply to the HWMU because buried metallic storage tanks are not present.

3.3.8 § 112.8(c)(5)

This section does not apply to the HWMU because partially buried storage tanks are not present.

3.3.9 § 112.8(c)(6)

Both ASTs and all three in-line generator tanks are visually inspected monthly for signs of deterioration, discharges, or accumulation of oil inside diked areas as described in Section 2.5 of this Plan. The ASTs shall undergo a formal exterior inspection by a Certified Tank Inspector at least once every 20 years. As part of the formal inspection, a non-destructive integrity testing such as hydrostatic testing or ultrasonic testing shall be completed.

The facility is deviating from the integrity testing provision under § 112.8(c)(6) for the remaining facility ASTs. The 55-gallon drums of hydraulic fluid will be fully inspected upon delivery. The 55-gallon waste oil drums will be fully inspected prior to filling.

The tanks are not insulated and the outside of the shells can be observed on an ongoing basis. The tanks all have secondary containment, which serves as a release prevention barrier. The secondary containments are properly sized to contain a release. Under STI SP-001, the steel tanks would qualify as Category 1 tanks, requiring periodic inspections. The personnel completing the inspections are familiar with the storage operations, characteristics of the liquids stored, types of ASTs and their associated components. The scope of the inspections is presented in Section 2.5 and focuses on detecting any change in AST conditions and signs of product leakage from the ASTs.

If signs of leakage or deterioration are observed, the tank shall either be replaced or inspected by a Certified Tank Inspector to assess its suitability for continued service.

The ASTs typical configuration, combined with monthly inspections, ensure that any small leaks that could develop in the tank shell will be detected before it can become significant, escape the secondary containment, 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 conditions of the tanks and their suitability for continued service.

The test and inspection forms shall be kept on file for a period of three years.

3.3.10 § 112.8(c)(7)

Internal heating coils are not used in the bulk oil storage tanks.

3.3.11 § 112.8(c)(8)(i-v)

A direct audible or code signal communication between the container gauger and filler is employed while filling the ASTs. The ASTs are filled via fueling truck and also employ a level gauge and high level indicator. Hydraulic oil is manually pumped from 55-gallon drums to the equipment. Waste oil is dumped into the 55-gallon waste oil drums. Site workers are present for and observe all oil transfer operations. The following filling procedures shall be used for all tanks:

- Verify sorbent materials are near the container area;
- Visually verify the container will receive product and that there is sufficient free capacity;
- Visually monitor the filling operation and utilize a direct audible or code signal communication between the container gauger and filler.

For any ASTs that have a level gauge with a high level indicator, the level gauge shall be tested to verify proper function at least every five years.

3.3.12 § 112.8(c)(9)

Effluent treatment facilities are not used at FWDA.

3.3.13 § 112.8(c)(10)

Visually detected discharges from oil containers will be corrected promptly following detection. Discharges may include, but are not limited to, leaks from seals, gaskets, seams, rivets, welds, piping, pumps and bolts. Any spilled or leaked oil shall be promptly cleaned up.

3.3.14 § 112.8(c)(11)

Secondary containment basins are located under every oil storage container. In addition, spill kits are located near all oil storage containers.

3.4 40 CFR § 112.8 (D) TRANSFER OPERATIONS

3.4.1 § 112.8(d)(1)

This section does not apply to the HWMU of FWDA because buried oil transfer piping is not present at the facility.

3.4.2 § 112.8(d)(2)

Terminal connections shall be blank-flanged or capped when not in service.

3.4.3 § 112.8(d)(3)

This section does not apply to the HWMU of FWDA because pipe supports are not used at the HWMU.

3.4.4 § 112.8(d)(4)

Aboveground valves and related appurtenances are subjected to regular examinations by operating personnel at which time the general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces is assessed.

3.4.5 § 112.8(d)(5)

The operator of any vehicle entering the facility will be notified of the location of any aboveground piping or other oil transfer operations.

TABLE A-1
EMERGENCY CONTACT LIST
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Name	Organization	Project Role	Phone	Email Address
LOCAL EMERGENCY RESPONSE ORGANIZATIONS - **ALL EMERGENCIES DIAL 911**				
Dispatcher	Metro Dispatch	Emergency Response	(505) 722-2002	
Fire Department	McKinely County Fire Dept	Emergency Response	(505) 863-3839	
Police	New Mexico State Police	Emergency Response	(505) 863-9353	
Police	Gallup Police	Emergency Response	(505) 863-9365	
Health Care	RMCHCS	Emergency Response	(505) 863-7000	
USACE AND FWDA CONTACTS				
Eric Kirwan	USACE SWF	Project Manager	(817) 886-1673	stephen.e.kirwan@usace.army.mil
Steve Smith	USACE SWF	FWDA Program Manager	(817) 886-1879	steve.w.smith@usace.army.mil
Mike Kipp	USAEC	U.S. Army Environmental Command		
Mike Scoville	USACE SWF	Onsite Corps Ordnance & Explosives Safety Specialist (OESS)	(814) 866-1875	
Richard Cruz	FWDA	FWDA Caretaker	(505) 905-6190	richard.cruz2@us.army.mil
Micki Gonzales	FWDA ARM	FWDA Administrative Records Manager	(505) 905-6108	lura.gonzales@us.army.mil
Mark Patterson	FWDA BEC	FWDA BEC	(330) 358-7312	mark.c.patterson@us.army.mil
Martin Eastridge	MDA	MDA Caretaker	(575) 649-0352	
EPA				
Chuck Hendrickson	EPA 6	Regulatory Review	(214) 665-2196	
NMED				
John Kieling	NMED	New Mexico Environment Dept, RCRA Permits Management Program	(505) 476-6016	
Dave Cobrain	NMED	New Mexico Environment Dept, Hazardous Waste Bureau	(505) 476-6055	dave.cobrain@state.nm.us
URS				
John Carson	URS	Project Manager	(402) 952-2514	john.c.carson@urs.com
Brandon Puttroff	URS	Deputy PM/Engineer	(402) 305-9032	brandon.puttroff@urs.com
Dennis Day	URS	Program Health and Safety Officer	(402) 952-2525	dennis.day@urs.com
Mac Reed	URS	MMRP Health and Safety Officer	(615) 224-2148	mac.reed@urs.com
Bob Florence	URS	Senior UXO Supervisor	(321) 784-2035	bob.florence@urs.com
Dan Kur	URS	UXO Safety/QC Officer	(586)703-0754	daniel.kur@urs.com
DISPOSAL FACILITIES				
Operator	Clean Harbors	Industrial services	(970) 625-2802	

TABLE A-1
EMERGENCY CONTACT LIST
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Notes:
EPA 6 = Environmental Protection Agency Region 6
FWDA = Fort Wingate Depot Activity
FWDA ARM = Fort Wingate Depot Activity Administartive Records Manager
FWDA BEC = Fort Wingate Depot Activity Base Realignment and Closure Environmental Coordinator
MDA = Missle Defense Agency
MMRP = Military Munitions Response Program
NMED = New Mexico Environment Department
QC = Quality Control
RCRA = Resource Conservation and Recovery Act
RMCHCS = Rehoboth McKinley Christian Health Care Services
URS = URS Group, Inc.
USACE SWF = U.S. Army Corps of Engineers - Fort Worth District
USAEC = U.S. Army Environmental Command
UXO = Unexploded Ordnance

SPILL PREVENTION, CONTROL, COUNTERMEASURES PLAN POLLUTION PREVENTION TEAM
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Name of Team Member:	Brandon Puttroff	John Mura	Jayden Hastiin-Nez	Mike Parrell
Title:	Engineer	UXO Technician	UXO Technician	
Cellular Telephone Number:	(402) 305-9032			(910) 382-5083
Office Telephone Number:	(402) 952-2649	(505) 503-9444	(505) 716-1700	(505) 728-4705
Responsibilities				
Team Leader	X	X	X	X
Signatory Authority	X	X	X	X
Conduct Employee Training	X	X	X	X
Record Keeping	X	X		
Submit Reports	X	X	X	X
Implement BMPs	X	X	X	X
Routine Visual Inspection	X	X	X	X
Annual Inspection	X	X		
Revise SPCC	X			
Storm Water Monitoring	X	X	X	X
Implementation Guidance	X	X	X	X
Annual Review	X			

APPENDIX C

Certification of the Applicability of Substantial Harm Criteria Checklist

SPCC PLAN

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

Facility: Fort Wingate Depot Activity – Hazardous Waste Management Unit
Fort Wingate, New Mexico

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

   YES _____ NO X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage 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 formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife sensitive environments? For further description of fish and wildlife sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response 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, Appendix C, 40 CFR 112 or a comparable formula) such that the discharge would shut down a public drinking water intake?

   YES _____ NO X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount 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.

Name (type or print) Signature

Title Date

Spill Response Procedures

Initial Actions

1. Determine if any personnel have been injured. If so, seek medical attention for injured personnel.
2. Put on the appropriate personal protective equipment, for oil spills including:
    - Gloves
    - Eye goggles
    - Apron (if warranted)

If the Spill is Small (approximately 5 gallons or less):

1. Apply absorbent around and across the spill
2. Remove the absorbent and the spill with broom and dustpan or shovel
3. Place the spilled material and absorbent into an approved container
4. Contact the individuals listed on the Primary Contacts List (see below)

If the Spill is Large (5 gallons or larger)

1. Apply absorbent around the released material
2. Contact the following individuals from the Primary Contact List
    - Pollution Prevention Team members
    - Any emergency contacts necessary such as fire and police
    - Emergency Spill Response Contractor
    - Local and State Agencies
    - EPA Region 6 Office (if spill qualifies according to Section 1 of this Plan)

SPILL INCIDENT FORM

Facility Address and Phone:_____

Date, time, and duration of the release: _____

Source//location of the release: _____

Person or persons causing and responsible for the release: _____

Type and amount of oil released: _____

Cause of the release: _____

Environmental damage caused by the release: _____

Actions taken to respond, contain, and clean-up the release: _____

Actions being taken to prevent a re-occurrence of the release: _____

Describe known or anticipated acute or chronic health risks associated with the release: _____
_____

Describe any injuries or need for evacuation: _____
_____

Is the release of this material a "reportable" quantity by statutory requirements?
_____ Yes _____ No

Determined by: _____ Date: _____

Notifications

	Contact Person	Date	Time
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	Government Agencies		
	A. Local _____	_____	_____
	B. State _____	_____	_____
	C. Federal _____	_____	_____

Comments provided on the back of this form

Monthly Inspection Standard Operating Procedure

Monthly Preventative Maintenance Inspection Report

MONTHLY INPSECTION STANDARD OPERATING PROCEDURE

PURPOSE

The purpose of the Standard Operating Procedure for Routine Inspection of ASTs is to ensure that facility ASTs are inspected in a timely and consistent manner.

RESPONSIBILITY

It is the responsibility of ALL management personnel to publish and distribute this Standard Operating Procedure as well as insuring the proper training of personnel. It is the responsibility of the SPCC Team to ensure this SOP is adhered to at all times.

INSPECTION PROCEDURES

The following procedures shall be used when completing the monthly ASTs inspection:

Steel ASTs

Visually inspect all sides of the tank exterior and check for the following:

- Signs of leaking, contamination, or visible product
- Rust, corrosion, pin holes, or other signs of deterioration
- Integrity of welds
- Signs of damage such as dents
- Drainage valves on secondary containment are closed, if applicable
- Secondary containment does not have any cracks or damage
- Structural soundness of any tank supports or foundation
- Visually test level gauge for function, if applicable (i.e., observe during filling operation)
- Spill kits are available

Plastic AST

Visually inspect all sides of the tank exterior and check for the following:

- Signs of leaking, contamination, or visible product
- Signs of damage such as gouges, scratches, or cracks
- Signs of wall thinning such as misshapen tank walls
- Drainage valves on secondary containment are closed, if applicable
- Secondary containment does not have any cracks or damage
- Structural soundness of any tank supports or foundations
- Visually test level gauge for function, if applicable (i.e., observe during filling operation)

- Spill kits are available

Each inspection shall be recorded on the Monthly Preventative Maintenance Inspection Report included in this appendix. The inspection report shall be kept on file for three (3) years from the date of the inspection.

MONTHLY PREVENTATIVE MAINTENANCE INSPECTION REPORT

NOTE: This report must be completed each month by a member of the Pollution Prevention Team and a copy filed maintained in the URS field office and at the Administrative Record at Building 1 at FWDA.

Person performing inspection: _____

Date of inspection: _____

Instructions: After inspection of each item, signify in each column by a check mark if the inspected area is in good condition and functioning. If not, complete the "Inspection Results" section below and specifically note any areas where potential spill or contamination risks are observed.

STORAGE TANKS

Tank # (See Facility Diagram)	Tank Contents	Visual tank inspection (i.e., evidence of leaks, corrosion or structural weakness)	Tank foundation and Support	Spill containment area	Tank level gauge (is it functioning properly)
1. Fuel Oil #1 (3,000-gallon)	Diesel Fuel			Yes (berm)	
2. Fuel Oil #2 (TFU Generator Tank)	Diesel Fuel			Yes (berm)	
3. Generator Tank #1 (HWMU – 40 KW)	Diesel Fuel			Yes (berm)	
3. Generator Tank #2 (HWMU – 608 KW)	Diesel Fuel			Yes (berm)	
3. Generator Tank #3 (HWMU – 400 KW)	Diesel Fuel			Yes (berm)	
6. Hydraulic Fluid	Hydraulic Oil			Yes (catch basin)	N/A
7. Waste Oil	Empty/Waste Oil			Yes (catch basin)	N/A

Inspection Results

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

NOTE: This Report must be maintained for three (3) years from the above date.
Keep on file until _____ Inspector's Initials _____ Date _____

PIPING AND TRANSFER MATERIAL

Description	Visual Inspection (i.e. evidence of leaks, corrosion or structural weakness)	Piping Supports (i.e. evidence of corrosion or structural weakness)	Valves and flange connections
Transfer lines to TFU from fuel oil tank #2			
Transfer lines and pumps for equipment fueling from fuel oil tank #1			
Transfer lines and pumps for Generator Tank #1 to generator			
Transfer lines and pumps for Generator Tank #2 to generator			
Transfer lines and pumps for Generator Tank #3 to generator			

Inspection Results

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

NOTE: This Report must be maintained for three (3) years from the above date.
Keep on file until _____ Inspector's Initials _____ Date _____

SPILL KITS

Description	Location	Contents	Comments
Spill Kit #1	3,000-gallon AST	Pad, tubes, & Oil Dri or equivalent	
Spill Kit #2	300-gallon AST	Pad, tubes, & Oil Dri or equivalent	
Spill Kit #3	Hydraulic fluid and waste oil storage area	Pad, tubes, & Oil Dri or equivalent	
Spill Kit #4	Sift plant control station	Pad, tubes, & Oil Dri or equivalent	

Inspection Results

Problem Area	Nature of Problem	Recommendation for Correction	Corrective Action Taken (should be initialed and dated by inspector listed above upon completion of work)

NOTE: This Report must be maintained for three (3) years from the above date.
Keep on file until _____Inspector's Initials _____Date _____

SPILL CONTROL TRAINING

Instructions: This training session shall be given to site workers on an annual basis. The site workers must initial each blank to signify receipt of training in applicable area.

1. Spill Prevention

_____ Material handling procedures

_____ Preventative maintenance practices

_____ Housekeeping practices

2. Recognizing and Identifying a Spill

_____ Indications of spills (odors, fumes, vegetation damage)

_____ Identifying spilled materials (e.g. fuel oil, hydraulic fluid, waste oil)

_____ Safety procedures when exposed to spilled materials (see also MSDS sheets)

3. Containment of Spilled Materials in Plant Drainage System

_____ Safety issues in containing spills

_____ Manner and technique of spill containment

4. Stopping or Diverting Flow of Spilled Materials from Spill Source

_____ Location and operation of shutoff and drain valves on tanks and other containment devices

_____ Location and operation of breaker switches for power source

_____ Location of spill kits

- Spill Kit #1 @ Fuel Oil #1 (3,000-gallon tank)
- Spill Kit #2 @ Fuel Oil #2 (300-gallon TFU Generator Tank)
- Spill Kit #3 @ Hydraulic and Waste Oil Storage Area
- Spill Kit #4 @ Sift plant control station

5. Cleanup and Neutralization

_____ Safety concerns in cleanup and neutralization

_____ Use of absorbent materials (e.g. for petroleum spills)

6. Employee responsibilities in the event of a spill. As soon as an employee has reason to believe that a spill has occurred, the employee should:

a) Determine if there is the possibility of a health or safety threat. The employee should know the location of the MSDS sheet for commonly used materials so that these may be referred to in case there is a question as to the potential risks posed by the material. If there is, then the first thing which must be done is to evacuate the area.

b) Notify supervisor of the following
   (1) location of possible spill
   (2) identity of spilled material
   (3) estimated quantity (if possible)

c) Stop or divert flow of spilled materials (as safety concerns permit)

d) Institute measures to contain the spilled material in the area of the spill (as safety concerns permit)

e) Institute cleanup or neutralization procedures as directed by the Plant Manager or his designated representative.

f) Provide information as requested for completion of Spill Report

I certify that I have received training in the above noted areas on the date written below. I understand these procedures and agree to abide by them.

_____ _____

Employee Name Date

ANNUAL SPCC TRAINING RECORD
HWMU
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

Name (Print)	Date	Time	Signature

Topics covered include: SPCC Contents, site storage, monthly inspections, spill response

Instructor (Print): _____ Signature: _____

Time: _____ Date: _____

SPCC PLAN FIVE-YEAR REVIEW SUMMARY
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO

In accordance with 40 CFR § 112.5(b), this Plan is reviewed at least once every five years after April 1, 2013. The reviews are recorded as follows:

Reviewer (signature)	Reviewer (print)	Date	Comments	P.E. Seal Required? (Y/N)