SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN (SPCC)

In Conformity with NFPA 407
40 CFR Parts 112

Columbia Air Services – Rutland, LLC

Rutland State Airport
North Clarendon, VT
(802) 773-3348

Contact:
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March 8, 2013

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN – GENERAL INFORMATION

Name of Facility: Columbia Air Services – Rutland, LLC

Type of Facility: Fixed Base Operation

Facility Location: Rutland State Airport
North Clarendon, VT 05759

Mailing Address: Columbia Air Services – Rutland, LLC
1004 Airport Road
North Clarendon, VT 05759

Hours of Operation 0800-2000 Local
7 days/week

Accountability: Christopher Beitzel
General Manager

EMERGENCY PHONE NUMBERS

See appendices A, B, and C for emergency telephone numbers, notifications, and spill procedures.

I. DESCRIPTION OF FACILITY

The facility consists of an FBO (Fixed Base Operator) at the Rutland State Airport engaged in flight services including aircraft fuel sales and aircraft sales. There are two storage tanks utilized for fuel sales as follows:

- One double wall 12,000 gallon tank containing AvGas (100LL)
- One double wall 15,000 gallon tank containing Jet A

See Appendix D MSDS

The storage tanks are used to store fuel to be delivered to aircraft via approved refueling vehicles. All fuel is delivered to the storage tanks by approved delivery vehicles.

DESCRIPTION OF VEHICLES

The facility has two (2) vehicles used for refueling. Unit # 5119 is a Ford F-Series, with dual axles with a Max payload of 18300 lbs. The load rate is 200 Gallons per minute at 3 Pounds per square inch, gauge and the unload rate is 200 GPM at 6 PSIG used for Jet A refueling. The other vehicle Unit # 4121 is an International 4700 T series dual axle with a Max payload of 8460 lbs, The load rate is 150 GPM at 3 PSIG and the unload rate is 125 GPM at .38 PSIG used for refueling Avgas.

II. PAST SPILL EXPERIENCE

There has been one EPA reportable "spill event" in the past twelve (12) month. (WMD 587)
Jet fuel released onto tarmac on 11-30-212, Fuel was contained and cleaned up using absorbent pads. No fuel migrated off tarmac; however some fuel ended in the soil area from runoff which was clean up by outside cleanup agency.

III. POTENTIAL SOURCES OF SPILLS

A) ABOVE GROUND TANKS

The sources of any potential spills could include the rupture of one of the storage tanks or a flexible connecting line or valve. The two above ground tanks are double wall construction and have shut-off valves located adjacent to the tanks at the connection points.

B) MOBILE REFUELERS

The mobile refuelers are state of the art vehicles, with stainless steel tanks equipped with rollover protection and double locking manhole covers.

The refuelers are marked with letters at least 3 inches high on all sides to show flammability, product type and display standard hazardous materials placards. All placards shall be of a color contrasting sharply with the sign background for visibility. A "NO SMOKING" sign shall be posted in the cab.

The refuelers are equipped with a minimum of two fire extinguishers having at least a 20-BC rating, each accessible from a different side.

Both vehicles are equipped with a system capable of overriding all other controls and stopping all fuel flow with one physical movement. Emergency fuel shut-offs should be boldly marked and should have the word "PUSH" or "PULL" as appropriate. Mobile fuelers shall also be equipped with a tank bottom cutoff valve, which can block fuel flow in the event of piping rupture or valve failure.

Both vehicles are equipped with bonding cables to facilitate prompt, definite electrical connection to the aircraft being fueled.

Both refuelers are equipped with a spark arrestor, and leak-free exhaust system terminating in a standard baffled muffler, and shall contain no feature which would allow fuel or concentrated fumes to contact the exhaust system if overfilled.

Fuel tanks are equipped with gasket dome covers with a forward mounted hinge and self latching catches which contain an emergency vapor pressure relief valve and are adequate to prevent fuel spillage during vehicle movement.

Electrical equipment, switches, and wiring are explosion proof and reasonably protected from heat, abrasion, or impact which could be an ignition source.

Fuel systems shall have electrical continuity between all metallic or conductive components.

Fuel system piping shall be reasonably protected from impact/stress, which could cause fuel spillage.

All nozzles shall be controlled by a dead man flow shut-off feature.

Leaking mobile fuelers shall be removed from service and either repaired immediately or defueled and parked in a safe area until repaired.

Aircraft fuel servicing vehicles shall have an integral system or device (brake Interlock system) that prevents the vehicle from being moved unless all fueling nozzles and hydrant couplers are properly stowed and mechanical lifts are lowered to their stowed position.

IV. CONTAINMENT AND DIVERSIONARY STRUCTURES

- All tanks and associated piping are located on an impervious tertiary concrete area. In the event of a spill, appropriate measures must be taken to contain and dispose of all materials properly.

- Both above ground tanks have built in secondary containment with a visible interstice gauge.

- Absorbent material is available on site. In addition, sand is available from the Vermont Agency of Transportation facility to deliver large quantities of sand for diking or absorbing if needed in a large spill.

The Fueling and Transfer area will have Cement pads which will have spill ribs marked into them to help with spill releases in the future. The location will be the area where vehicles currently fuel and where the (2) fuel trucks currently park in the transfer area.

V. SPILL PREVENTION OF BULK STORAGE TANKS

All tanks have been constructed and installed to meet the requirements of UL-142, Standards for Safety, Steel above Ground Tanks for Flammable and Combustible Liquids, and applicable NFPA, 520 CMR and 527 CMR requirements. Each tank is adequately vented for the expected fill and withdrawal rates. All loading and unloading of refueling and delivery vehicles is performed by trained personnel using permanently mounted pumps, with fixed rates of flow.

All valves are normally closed unless opened to fill or withdraw product. Any visible leaks shall be immediately corrected.

Periodic inspection will be performed in accordance with FAA regulations Part 139, in which a certify employee of Columbia Air Service will check for leaks or crack on all piping, valves, pumps, and tanks. Any visual deficiencies shall be noted and immediately re-certified. See sections VII.

VI. FACILITY TRANSFER OPERATIONS

There are no buried fuel pipes.

There are no pipeline terminal connections at this facility.

All pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.

New procedures effective immediately, will mandate that two (2) lineman both employees and certify with Columbia Air Service must be present while uploading fuel onto the refuelers. One line service employee will have control of the hand held dead man shutoff. The second line service person will be in positioned on the ground to monitor pipes, valves and hose connection assembly. Both line service employees will remain in position for the duration of the upload. The new procedure will ensure the least possible amount of fuel will make contact with the ground while being the most effective precaution to follow.

All tanks are designed with pre-check shutoff valves, as well as overload protection to avoid overfilling any tanks.

Transferring of product will be done during daylight hours only, as part of Columbia Air Service procedures.

VII. INSPECTION AND RECORD KEEPING

Daily

Before operation each day, the bulk storage facility and mobile refuelers shall be inspected. This inspection shall be recorded along with any observations or actions taken. The following shall be done as a minimum:

- Check all tanks, piping and valves for leaks or overnight vandalism daily and record.
- Check the containment area for any spill or evidence of oil residue, as circumstances dictate.
- If overnight rainfall has occurred, the clear water may be discharged through the containment drainage system. Retained storm water from diked areas is to be inspected for fuel spilled, fuel film or other objectionable characteristics prior to discharge. If there is any evidence of petroleum products, the film shall be "skimmed off" or absorbed and properly recovered and/or discharged prior to clear water discharged.
- Before leaving each night, all valves, tanks, and lines shall be inspected and all electricity turned off to pumps with exception to the self serve pumps in order to facilitate 24 hour service.

If any of the above items are not normal, they shall be corrected before beginning operations for the day.

Monthly

During each month, preferably the same week each month, a tank and piping inspection must be completed and documented per the attached Monthly Inspection Report for Above Ground Storage Facilities sheet.(Attached as Appendix D)

In the event of any presences of petroleum products found in the oil water separator, a comprehensive inspection of the facility shall be completed to identify the source of the petroleum product. Any deficiency shall be repaired immediately.

In the event of a major spill, such as tank overflow, rupture or line break, immediately notify and report to the appropriate persons listed at the beginning of this document.

Quarterly

Columbia Air Service staff personnel will inspect the farm and vehicles weekly as well as quarterly to ensure that they meet all State and Federal regulations under FAA section 139.

VIII. SECURITY

The fuel storage area will be secured with an eight-foot high chain link fence with locking gates around the perimeter of the airport.

The loading/unloading connections of oil pipelines will be capped or blind-flanged when not in service for an extended period of time.

Facility lighting will remain on during hours of darkness to assist in the discovery of spills and as a deterrent to vandalism.

IX. PERSONNEL

All line service personnel shall be instructed in spill prevention and countermeasures. This shall include, but not be limited to:

- Explanation of operation and maintenance of the facility and equipment;
- Spill prevention rules, regulations and policies;
- Proper inspection and record keeping procedures; and
- Procedures to be taken in the event of a spill

Any new line service employees shall receive annual (more often, if necessary, or as directed by changing regulations) "refresher training," in safety, spill plan procedures, and operations. At this time, any new regulations, changes in procedures or equipment shall also be discussed. All such meetings shall be mandatory and attendance shall be recorded.

APPENDIX A

SPILL PREVENTION CONTROL
And
COUNTERMEASURES PLAN

The Agency of Transportation intends to minimize the risk of accidental spills from the use of above ground fuel tanks. The following procedures will be followed when a storage tank is being filled, when vehicles are being fueled, and when there is a spill resulting from the operation of the tank.

Tank Fill

The fuel delivery driver will follow his/her company's procedures for delivering fuel to the company's above ground tanks. Columbia will have an employee monitor the operation. At a minimum, the tank will be checked for capacity by reading the fuel level gauge before delivering fuel.

Truck Fueling

At all times truck fueling operations will be monitored by the truck operator. At no time will the fuel delivery hose be left unattended. Any overfill will be immediately reported to a supervisor.

Spills

The supervisor will follow Columbia's spill reporting procedures. All company resources will be used to minimize the impact of a spill, using sorbent pads and booms. Sand will be used for emergency dykes. All employees of this facility shall be made aware of this plan. Instructional signs will be placed at the tanks for consumers to follow in the event of a spill when refueling their own aircraft.

APPENDIX B

Notification of Federal, State, and Local Authorities:

A. Any incident or event which may result in implementation of this plan requires that the following organizations be notified immediately:

Aviation Airport Manager – **(802) 773-3348**

Vermont Agency of Transportation - Maintenance Division
Telephone Number: **(802) 828-2587 or (802) 229-8740 (M)**

Vermont Department of Public Safety – Emergency Management Division
Telephone Number: **(800) 641-5005**

Vermont Agency of Natural Resources – Hazardous Materials Division
Telephone Number: **(802) 828-1138**

B. Any incident where the threat of damage may extend beyond this site:

National Response Center, Washington, D.C.
Telephone Number: **(800) 424-8802**

C. If a spill may endanger ground or surface water:

Environmental Protection Agency, Lexington, MA
Telephone Number: **(617) 223-7265**

D. In case of an evacuation of the complex, or as needed in support of containment and control activities:

Fire Department:	911
Vermont State Police:	911
Local Police:	911
Ambulance:	911
Hospital:	911

APPENDIX C

Emergency Equipment:

A. Sand for absorption or diking may be obtained from the AFR building.

B. Front-end-loader may be used for ditching or carrying materials.

C. Fire extinguishers are located on each truck and at the fuel farm.

D. A spill-kit containing absorbent and diking materials is located in each truck and at the fuel tanks.

E. Additional shovels, brooms, gloves, and pads are available at the FBO.

One of the following companies must be called when a spill is beyond the ability of site personnel. The Agency of Transportation's Hazardous Materials Unit must be contacted at the same time by pager @ (802) 250-4666**:**

Environmental Products & Services
Burlington, VT
Telephone: **(802) 862-1212**

ENPRO Services, Inc.
2 Flynn Avenue
Burlington, VT 05401
(802) 488-3904
24Hr Emergency Response Services 800-966-1102

APPENDIX D

MSDS SHEETS

JET A FUEL

AV GAS (100LL)