SPCC

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Boulder City Municipal Airport
1201 Airport Road, Suite 200
Boulder City, Nevada 89005

Prepared July 2023

Prepared by:

BROADBENT
8 West Pacific Ave
Henderson, Nevada 89015
18-01-215-201

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

1. Name of Facility: Boulder City Municipal Airport
2. Type of Facility: Municipal Airport
3. Location of facility: 1201 Airport Road, Suite 200 Boulder City, Nevada 89005
4. Name and address of owner or operator:

Operator:
Marissa Adou, Airport Manager

Boulder City Municipal Airport
1201 Airport Road, Suite 200
Boulder City, NV 89005

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described

Signature: Marissa Adou

Name: Marissa Adou

Title: Airport Manager

ENGINEERING CERTIFICATION

The undersigned certifies and attests: (1) he is familiar with the Regulation; (2) he or his agent has visited and examined this facility on July 19th, 2023; (3) the Plan has been prepared in accordance with good engineering practice and with the requirements of this regulation and Industry Standards; (4) procedures for the required inspections & testing have been established; and (5) the Plan is adequate for the above-named facility. Engineering Certification does not relieve the owner/operator of their responsibility of implementing the requirements of this regulation.

Chris Carrier
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Date 8-22-23 Registration No. 24060 State NV

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1. Introduction

(Ref. 40 CFR §112.1, §112.3, §112.7(a)(1), §112.7(a)(2), §112.8(a))

This Spill Prevention, Control and Countermeasure (SPCC) Plan has been prepared for the Boulder City Municipal Airport as required by the U.S. Environmental Protection Agency (EPA) per Title 40, Code of Federal Regulations, Part 112 (40 CFR §112). This SPCC Plan includes the spill reporting requirements of Nevada Administrative Code (NAC) 445A.3475. The intent of this SPCC Plan is to outline the requirements and procedures to be followed for both the prevention of and the response to oil and other petroleum product discharges. This SPCC plan is designed to reduce the potential for discharges of oil into the navigable waters of the United States and to contain such discharges should they occur. "Oil" as defined under federal regulations includes petroleum oils such as gasoline, diesel, kerosene and heating oil, as well as non-petroleum oils such as animal and vegetable oils, synthetic oils, and mineral oils.

40 CFR §112.1(b) states that a SPCC Plan is required for "any owner or operator of a non-transportation related onshore or offshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil or oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful…into or upon the navigable waters of the United States or adjoining shorelines." The Boulder City Municipal Airport is located at 1201 Airport Road, Suite 200 Boulder City, Nevada 89005. The facility is required to comply to the SPCC Rule because it has an aggregate aboveground oil storage capacity greater than 1,320 gallons. All existing tanks at this site are Aboveground Storage Tanks (ASTs); therefore, AST regulations are applied in this SPCC Plan.

A SPCC Plan must be available for on-site review by the Regional Administrator of the EPA during normal working hours.

Pursuant to 40 CFR §112, a completed Certification of Substantial Harm Determination Form is attached as Appendix A. A review and evaluation of the SPCC Plan must be performed at least once every five years by the owner or operator (see Appendix B). If an amendment to the facility occurs before the five-year period expires, the SPCC Plan will need to be updated and reviewed. This document was generated based on a 5-year Plan review. Unless amended, the next review session is scheduled for September 2023.

The Boulder City Municipal Airport conforms to the requirements listed in 40 CFR §112.7. Further discussion pertaining to conformance with requirements is presented in this SPCC Plan. In general, the operator of an airport must have a written site-specific spill prevention plan, which outlines the facility's compliance with 40 CFR §112. The plan must be approved by a Registered Professional Engineer, who is familiar with regulations, and has inspected the facility. During site inspection, *all* tanks and drums must be investigated. Airport operations require considerable amounts of fuel (jet fuel and aviation gasoline), which can rupture from tanks and/or leak during transfer operations. Regulations outlined herein are placed to guide airport operators for the proper prevention and control of spills.

1.1 Plan Amendments and Review

(Ref. 40 CFR §112.4, §112.5)

A review and evaluation of this SPCC Plan is required at least once every five (5) years. This SPCC Plan will be amended within six (6) months of the five (5) year review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review.

This SPCC Plan will be amended within six (6) months of a change in the facility design, construction, operation or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. An amendment will be prepared within six (6) months and implemented as soon as possible, but not later than six (6) months following preparation of the amendment. In the case of the Boulder City Municipal Airport, an amendment can be found necessary if any storage tanks are installed or moved before the end of the five-year review. A log for plan amendments and reviews can be found in Appendix B of this Plan.

Non-Technical Amendments

- Non-technical amendments do not require a Professional Engineer (PE) certification.
- Examples of changes include but are not limited to: phone numbers, name changes, any non-technical text change(s) and any facility reconfiguration that facility management determines does not materially affect the facility's potential to discharge oil.

Technical Amendments

- A PE must certify technical amendments.
- An amendment is required when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in 40 CFR §112.1(b). Examples of changes include but are not limited to: commissioning or decommissioning containers; replacement, reconstruction or movement of containers; reconstruction, replacements or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or addition/deletion of standard operation or maintenance procedures related to discharge prevention measures.
- It is the responsibility of the facility to determine and confirm with the regulatory authority as necessary what constitutes a technical amendment.
- Technical amendments affecting various pages within the plan can be PE certified on those pages, certifying those amendments only and documented on the log.

Amendments to Plan by EPA Regional Administrator

If the facility releases more than 1,000 U.S. gallons of oil in a single release or more than 42 U.S. gallons of oil twice within a 12-month period, the facility will submit documentation to the Environmental Protection Agency (EPA) Regional Administrator. The EPA Regional Administrator may then require the facility to amend its SPCC Plan.

2. Emergency Procedures

2.1 Emergency Contact List & Telephone Numbers

(Ref. 40 CFR §112.7(a)(3)(vi), §112.7(f))

Local Fire Department:	**911**
Boulder City Dispatch:	**702-293-9224**
Automated Weather Observing System (AWOS):	**702-293-1532**
Flight Service Stations (FSS):	**877-487-6867**
Flight Standards District Offices (FSDO):	**702-617-8500**
Federal Aviation Administration Regional Operation Center (FAA ROC):	**425-227-1999**
EPIC Aviation LLC:	**866-501-3742**

Facility Response Coordinators:
(Ref. 40 CFR §112.7(f)(2))

Name & Title:	**Marissa Adou** **Airport Manager**
Phone Number:	**702-293-9405**
Name & Title:	**Matthew McAlevey** **Assistant Airport Manager**
Phone Number:	**702-293-9405**
Name & Title:	**Jeffery Semak** **Airport Operations Agent**
Phone Number:	**702-293-9405**

Emergency Cleanup Contractor or Response Facility:

Name:	**Clean Harbors, Inc.**
Phone Number:	**702-258-0109**

Spill Reporting:

Nevada Division of Environmental Protection (NDEP):	**1-888-331-6337**
Nevada Energy (NVE):	**702-402-2900**
National Response Center (NRC):	**1-800-424-8802**
Environmental Protection Agency (EPA) Region 9:	**1-800-300-2193**

2.2 Emergency Procedures & Spill Response

(Ref. 40 CFR §112.7(a)(5))

A "release" can be defined as any pollutant, hazardous waste or contaminant that has been spilled, leaked, pumped, poured, emitted, emptied, discharged, injected, escaped, leached, dumped or disposed in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines. The subsequent procedures shall be followed should such a release occur:

a) Release < 25 gallons and /or < 3 yd^3 of soil impacted

1. The Facility Response Coordinator will coordinate all necessary notifications;
2. Stop the source of spill, if possible;
3. Contain releases through berming or other appropriate method;
4. Cover release with absorbents; and
5. Dispose of absorbent in waste receptacle, which will be sent to a landfill or to an appropriate treatment facility.

b) Release > 25 gallons and/or > 3 yd^3 of soil impacted

1. The Facility Response Coordinator will coordinate all necessary notifications;
2. Stop the source of spill, if possible;
3. Contain releases through berming or other appropriate method;
4. The Facility Response Coordinator or delegated official will organize clean up with in-house and contract services, as required; and
5. Notify regulatory agencies (NDEP, EPA, and NRC).

c) A single release of > 1000 gallons and/or two releases of > 42 gallons in one year

1. The Facility Response Coordinator will coordinate all necessary notifications;
2. If there is immediate danger, leave the area immediately and call 911;
3. Evacuate personnel to an upwind area that is safe from exposure, provide medical attention and first aid as necessary, and follow universal precautions;
4. Stop the source of spill, if possible;
5. Contain releases through berming or other appropriate method;
6. The Facility Response Coordinator or delegated official will organize clean up with in-house and contract services, as required; and
7. Notify regulatory agencies (NDEP, EPA, and NRC).

Please note: Only attempt to contain and stop the release if containing or stopping the release will involve a simple and safe action such as closing a valve. Direct contact with petroleum products should be avoided.

2.3 Spill Response Kits

Boulder City Municipal Airport stores materials and equipment necessary for spill cleanup in the material storage area located next to large ASTs. The materials will include absorbent socks, kitty litter, boom, goggles, gloves, and plastic and metal trash containers specifically for this purpose. Spill kits are also located inside the mobile refueling trucks. For spills smaller than 25 gallons, the hereby listed supplies can be used to contain the spill. However, substantial releases would require contacting an external cleanup contractor. If a spill occurs, the spill prevention plan will be modified to include measures to prevent this type of spill from reoccurring, and steps to take if it happened again. A description of the spill needs to be reported including what caused it, and what were the cleanup measures. The Airport Manager will be the spill prevention and cleanup

coordinator and may use contract personnel who have received spill prevention and clean up training.

2.4 Reporting a Release

(Ref. 40 CFR §112.7(a)(4))

In accordance with 40 CFR §112.4 (a), if a facility has a single release exceeding 1,000 U.S. gallons or two releases each exceeding 42 U.S. gallons within any twelve-month period as described in 40 CFR §112.1(b), the following information must be submitted to the EPA Regional Administrator in writing within 60 days:

1. Name of the facility;
2. Name of the owner or facility operator;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary;
7. The type of material released;
8. Estimates of the quantity released;
9. The cause of the release, including a failure analysis of the system or subsystem in which the failure occurred;
10. A description of all affected media and any damages or injuries caused by the release;
11. Actions taken to stop the release and whether evacuation was necessary;
12. Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
13. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Information shall be submitted to the address provided below:

U.S. EPA Region 9 Oil Program (SFD-9-4)
75 Hawthorne Street
San Francisco, CA 94105

Release reporting procedures for the Boulder City Municipal Airport include the following:

Inspection and maintenance logs are maintained at the facility office. SPCC regulations state that inspection records and written reports documenting reportable releases of petroleum shall be kept for a minimum of three years or according to the facility's normal business practice.

Reports must be completed by the Airport Manager, per Section 2.1 of this Plan, the Airport Manager shall act as the primary Facility Response Coordinator. These reports must include: cleanup activities, notification of appropriate governmental agencies, contractor work authorizations, and shipment records associated with offsite transportation and disposal. If a release is reported by telephone, the Boulder City Municipal Airport must follow up with a written report. In all instances, the Airport Manager must review the reporting regulations for requirements regarding report contents, deadlines for report submittal, and other required information.

A verbal report providing specific details regarding the release shall be given to the Airport Manager by the employee at the scene. The Airport Manager will be responsible for preparation of a summary report and the Spill Release Notification Form as necessary (https://nevadaenvironmentalactivities.ndep.nv.gov/Spill/ReportForm.aspx).

If a petroleum product "release" meets the definition of a "discharge" as defined in 40 CFR §110.3, the Airport Manager shall notify the NRC. A "discharge" is a release of oil into or upon the navigable waters of the United States or adjoining shorelines that may be harmful to public health or welfare or the environment of the United States. Harmful quantities are quantities that violate applicable water quality standards; cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines; or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

In accordance with NAC 445A.3475, if a release of 25 gallons of oil in a single event or of sufficient quantity to create a sheen on receiving waters occurs, NDEP shall be notified via their spill reporting hotline provided in Section 2.1. If two releases of 42 gallons or more occur at the facility in any 12-month period, or if a single discharge of more than 1,000 gallons occurs, the owner or operator must submit a report to the Regional Administrator of the U.S. EPA within 60 days. The report must contain all of the information listed in 40 CFR §112.4(a).

2.5 Spill History

Per 40 CFR 110.3, a discharge of oil "may be harmful" if the discharge violates water quality standards or causes a sheen on water or shorelines. NDEP defines the reportable quantity for oil as 25 gallons, 3 cubic yards of contaminated material, or the presence of oil on or in groundwater. To date, no reportable spills have occurred onsite. Should a reportable spill occur at the facility, a record of the incident shall be logged in a separate record held at the facility.

3. Physical Layout

(Ref. 40 CFR §112.7(a)(3)(i))

The facility is a Municipal Airport located at 1201 Airport Road, Suite 200 Boulder City, Nevada 89005. The facility is comprised of three aboveground storage tanks, five mobile truck refuelers, and 55-gallon drums of used oil. In Drawing 1, a site map is shown to locate the tanks on the property.

3.1 Facility Drainage

(Ref. 40 CFR §112.8(b)(1), §112.8(b)(3), §112.8(b)(4), §112.8(c)(3))

Topography images show that drainage at the facility flows south. If a spill occurred, it would flow into a drain south of the fuel farm, then into a channel that runs southwest of the property. Typically, stormwater retained in diked areas are checked for sheen before being released into an open watercourse. Regulations state that if sheen exists, the stormwater would be pumped out and disposed by a licensed clean up contractor. In undiked areas (such as where tank truck discharges may occur in the refueling area) there are no catchment basins, but the facility is designed with a channel to retain oil downstream in the event of an unforeseen discharge. Rainwater is inspected at the facility for sheen prior to removal to assure compliance with applicable water quality standards. In diked areas, rainwater is pumped out manually using vac-trucks and hauled off. The visual inspection of stormwater is conducted by the Operators and recorded in the Operator Log. If sheen is detected, necessary actions are taken to comply with 40 CFR 110.

3.2 Fuel and Oil-Related Products

(Ref. 40 CFR §112.7(e)(2)(i))

A summary of all fuel and oil product storage is included in Table 1 and their locations are identified in the Site Map.

Table 1: Summary of Fuel and Oil Storage

Tank ID	Tank Capacity (gal)	Configuration	Material	Tank Content	Location
Aboveground Storage Tank #3	20,000	Fuel-filled Tank	Double-walled Steel	Jet Fuel	Fuel Farm
Aboveground Storage Tank #4	20,000	Fuel-filled Tank	Double-walled Steel	Jet Fuel	Fuel Farm
Aboveground Storage Tank #2	12,305	Fuel-filled Tank	Double-walled Steel	Avgas	Fuel Farm
B.F.E. Mobile Refuelers #1	3,000	Fuel-filled Truck	Steel	Jet Fuel	Selective Parking
Grand Canyon Airlines Mobile Refueler #2	2,200	Fuel-filled Truck	Steel	Jet Fuel	Selective Parking
Papillon Airways Mobile Refuelers #3	3,000	Fuel-filled Truck	Steel	Jet Fuel	Selective Parking
Papillon Airways Mobile Refueler #4	3,000	Fuel-filled Truck	Steel	Jet Fuel	Selective Parking
Boulder City Aviation Services Mobile Refueler #5	1,500	Fuel-filled Truck	Steel	Avgas	Selective Parking
Used Oil Drums	55	Oil-filled Drums	Steel Drums in Concrete Diking	Used Oil	Fuel Farm

3.2.1 Aboveground Storage Tanks (ASTs)

Two of the aboveground storage tanks can hold up to 20,000 gallons of jet fuel (Figure 2). A third aboveground storage tank was installed in 2023 that can hold up to 12,305 gallons of Avgas. The tanks are encircled by a fire suppression system installed with sprinklers on each side of the tanks. They require emergency venting to relieve excess pressure caused by fire exposure. They have a double-walled steel configuration which serves as secondary containment.

Figure 2. Jet fuel ASTs

Figure 3. Avgas AST

The tanks are connected to a pump and metering system for refueling purposes (Figure 3). The mobile refuelers receive fuel from the three ASTs and follow specific refueling procedures outlined in Section 9.1. During refueling operations, the mobile vehicles park in a bermed area (lateral to the tanks). The berm is designed to capture small spills and leaks that may occur while the mobile refuelers are loaded. The berm has the following dimensions:

Height: 4 in.
Perimeter: 184 ft
Area: 1,220 sf
These values give a volume of: L*W*H = 407 cf (3,042 gal)

EPIC Aviation LLC is the fuel supplier that regularly delivers fuel to the ASTs. Operation and maintenance of the tanks are summarized in the O&M Manual available onsite in the Office Building. Precautions must be taken to assure the tanks are not overfilled. Fail-safe systems (gauging and alarms) are used to prevent the tank from overfilling and to prevent damage to the tank. As shown in Figure 4, inside the material storage room, a clock meter and Veeder Root are used to monitor fuel levels inside the tanks to assure they don't drop below a certain level.

Figure 4. Pump and Metering System

Figure 5. Veeder Root

3.2.3 Waste Oil Storage

The used oil drums, located in the same diked structure as the AST, contain waste oil. As shown in Figure 5, there are typically five drums containing waste oil, jet fuel, Avgas, and mixed used oil. The used oil drums have adequate secondary containment provided by the diked containment structure, which has the following dimensions:

Length: 20 ft
Width: 8 ft
Height: 0.5 ft

These values give a volume of: L*W*H = 80 cf (598 gal)

After subtracting the volume occupied by the drums (approximately 10), the actual volume available in the containment structure to hold the ruptured tank would be: 494 gal.

Figure 5. Used Oil Drums

3.2.2 Other Fuels and Oils

There are various fuels and oils that are subject to the SPCC rule. The hazardous materials utilized on site will include oil, jet fuel, gasoline, and lubricants in conjunction with vehicle operations and maintenance. Routine vehicle maintenance including refueling will be done on the five mobile trucks. The mobile trucks used for refueling tanks contain variable amounts of jet fuel and aviation gasoline (Avgas) as shown in Figure 6. The mobile refuelers park selectively onsite and are equipped with spill kits on board to maximize efforts to reduce pollution.

Figure 6. B.F.E. Mobile Refueler #1

4. Discharge Prevention Measures

(Ref. 40 CFR §112.7(a)(3)(ii))

The Boulder City Municipal Airport is responsible for filling onsite oil tanks. Employees receive training in spill prevention at time of hire and annually thereafter. Discharge prevention briefings are held yearly to assure oil-handling personnel understands the risks posed by discharge sources. Employees have annual training sessions, therefore are familiar with the discharge controls, countermeasures, and spill cleanup procedures outlined in this Plan (Refer to Section 11 and Training Records in Appendix C). If a reportable quantity of hazardous or regulated materials is spilled, measures will be taken to control the spill, and notifications will be made to the Nevada Division of Environmental Protection (NDEP).

5. Discharge Controls

(Ref. 40 CFR §112.7(a)(3)(iii), §112.7(c), §112.8(c)(1), §112.8(c)(2), §112.8(c)(8)(v), §112.8(c)(10), §112.8(c)(11))

Discharge or drainage controls (e.g. secondary containment around tanks and other structures, equipment, and procedures for control of a discharge) include the following:

1. Containment Compatibility – All containers are constructed of material compatible for the storage of its contents
2. Secondary Containment –The used oil tank and oil drums are mounted inside a diked containment structure that serves as secondary containment. Drains from the secondary containment are equipped with a valve that are locked in the closed position. The three larger aboveground storage tanks are double-walled, which provides adequate secondary containment.
3. Rainwater accumulated –Diked areas for the mobile refueler loading area near the ASTs and the used oil secondary containment are equipped with a valve that are locked in the closed position. Accumulated stormwater will be checked for sheen before being released. If a sheen is detected, then the stormwater will be removed by a licensed cleanup contractor.

4. If any loss of oil from a container is detected, the employee will notify the Airport Manager who will take immediate steps to correct the cause of such a discharge. A licensed tank contractor will be called upon, if necessary. Any accumulations of oil will be promptly removed and disposed of according to regulations. The container will undergo all necessary maintenance, repair and integrity testing subsequent to repair.

6. Countermeasures

(Ref. 40 CFR §112.7(a)(3)(iv), §112.7(g)(5))

Countermeasures for discharge discovery, response, and cleanup include the following:

1. Monitoring – Facility staff will visually inspect tanks for signs of leaks during normal daily routines
2. Inspections – Tanks undergo visual inspections periodically. See Section 10 for more details.
3. Lighting – Facility is well lit to help identify potential leaks and spills during operating hours

7. Methods of Disposal

(Ref. 40 CFR §112.7(a)(3)(v), §112.7(a)(3)(vi))

All waste materials will be collected in one of the 55-gallon drums in the used oil storage area. No waste material will be buried onsite. All personnel will be instructed regarding the correct procedure for waste disposal.

In the event of a spill, Clean Harbor Inc. is the qualified environmental cleanup company that would be contacted at (702)-258-0109 to coordinate cleanup and remove any hydrocarbon-impacted soils for treatment and/or disposal. Disposal will occur pursuant to all local and federal requirements.

8 Potential Discharge

(Ref. 40 CFR §112.7(b))

Equipment failure, improper loading or unloading procedures, tank overflow, and rupture or leakage are known to be causes of a discharge. Table 2 presents a prediction of the direction, rate of flow and total quantity of oil that could be discharge from the facility as a result of a failure.

Table 1: Potential Spill Scenarios

Source	Type of Failure	Max Volume Released (gal)	Rate	Direction of Flow	Method of Containment
Aboveground Storage Tank #1	Leak or rupture	20,000	0-20,000	Channel downstream, or south	Double-walled tank. Cover contaminant in kitty litter for spills smaller than 25 gal or 3 yd^3 soil impacted.
Aboveground Storage Tank #2	Leak or rupture	20,000	0-20,000	Channel downstream, or south	Double-walled tank. Cover contaminant in kitty litter for spills smaller than 25 gal or 3 yd^3 soil impacted.
Aboveground Storage Tank #3	Leak or rupture	12,305	0-12,305	Channel downstream, or south	Double-walled tank. Cover contaminant in kitty litter for spills smaller than 25 gal or 3 yd^3 soil impacted.
B.F.E. Mobile Refueler #1	Leak or rupture	3,000	0-3,000	South	Cover contaminant using spill kit on board for spills smaller than 25 gal or 3 yd^3 soil impacted.

Source	Type of Failure	Max Volume Released (gal)	Rate	Direction of Flow	Method of Containment
Grand Canyon Airlines Mobile Refueler #2	Leak or rupture	2,200	0-2,200	South	Cover contaminant using spill kit on board for spills smaller than 25 gal or 3 yd^3 soil impacted.
Papillon Airways Mobile Refueler #3	Leak or rupture	3,000	0-3,000	South	Cover contaminant using spill kit on board for spills smaller than 25 gal or 3 yd^3 soil impacted.
Papillon Airways Mobile Refueler #4	Leak or rupture	3,000	0-3,000	South	Cover contaminant with spill supplies on board for spills smaller than 25 gal or 3 yd^3 soil impacted.
Mobile Refueler #5	Leak or rupture	1,500	0-1,500	South	Cover contaminant using spill kit on board for spills smaller than 25 gal or 3 yd^3 soil impacted.
Used Oil Drums	Leak or rupture	55	0-55	South	Concrete diking provides adequate secondary containment.

Potential Discharges, for example tank overflow, may result during transfer operations. Equipment failure such as rupture or leakage can also be the source of fuel discharge. The SPCC Plan needs to list all the oil storage equipment including the possible types of discharge, prediction of discharge direction, rate of flow, and potential volume released.

Due to the location of the airport, it would not be reasonable to expect oil discharge to reach navigable waters of the U.S. or the adjoining shorelines. Potential scenarios of tank failure would not result in discharge entering the lake, nor would the stream travel a significant distance from the outfall point to affect downstream communities. Topography shows that the spill would flow southwest into a dry lake bed. In the area surrounding the fuel farm, potential spills would flow down a southward slope and collect into a drain. No treatment of the contaminated effluent would be provided, rather the deployment of an absorptive boom would suffice to absorb the spill before entering the drain.

The largest source of potential discharge would be from either one of the 20,000-gallon ASTs. If one of the tanks ruptured the contents would pool in the surrounding area, and eventually spill into a drain that flows adjacent to the property. The probability for this is highly unlikely given the fact that the tanks are double-walled with leak detection systems.

9 Oil Handling and Transfer Procedures

(Ref. 40 CFR §112.7(a)(3)(ii), §112.7(e)(3), §112.7(h), §112.8(c), §112.8(d))

EPIC Aviation LLC is the fuel supplier in charge of refueling tanks. During transfer operations there is a high risk for spill, therefore the SPCC plan should address procedures for proper handling of

transfer operation equipment such as piping, valves, gauges, regulators, compressors, pumps and other mechanical devices. The following procedures are followed by all employees and vendors who may handle or transfer fuel at the facility.

9.1 Bulk Oil Handling

- Prior to filling, all valves and pipelines involved should be visually examined for correct positioning and possible leaks.
- Personnel will determine the existing tank volume from the liquid level gage before oil transfer begins.
- Trained personnel will be present to observe or conduct transfer operations and monitor the liquid level gage.
- All tank trucks are inspected after unloading and prior to departure for any discharges and to insure their outlets are properly closed, tightened and adjusted.

9.2 Bulk Deliveries

The facility loading areas utilize a single hose and connection or standpipe for the loading of tanks. There are conventional loading racks with loading arms, pipes and conventional structures used to fill or discharge from a rail car or tank truck. These types of loading facilities are considered ”loading racks” under 40 CFR §112.7(h) (Ref: SPCC Guidance for Regional Inspectors, Section 4.4.2).

All suppliers must meet the minimum requirements and regulations for tank truck loading established by the U.S. Department of Transportation. The Boulder City Municipal Airport ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. Fuel trucks are equipped with a safety inter-lock device that prohibits the vehicle from moving during transfer operations. The tank trucks are not required to be included in the SPCC Plan; instead they are regulated by the Department of Transportation, pursuant to 49 CFR §130.21.

9.3 Mobile Refuelers

Regular maintenance is required in order to ensure refueling vehicles of any size remain safe. These include standard operating inspections, preventative maintenance, and operator diligence in refueling vehicles. The mobile refuelers receive fuel from the ASTs in the bermed area of the fuel farm. Fluid levels should be checked each day to ensure all engine and operational systems have proper volume of working fluid. The operators in charge of refueling the trucks are trained also on how to use the Veeder root system. The bottom load connection on the vehicles should be leak free and be protected by a dust cover. Pre-checks should be in operating condition, otherwise loading should cease. Spill kits and two 20lb fire extinguishers in every vehicle are available on board. Vehicle operators are trained in all bulk oil handling procedures outlined in Section 9.1.

10. Inspection

(Ref. 40 CFR §112.7(e), §112.7(e)(8), §112.8(c)(6), §112.8(c)(9))

The Airport Manager is responsible for ensuring that facility inspections and appropriate tests are completed. Inspection records (signed by the appropriate supervisor or inspector) are to be retained with the SPCC Plan for a period of at least three years. Records of inspections and tests that are kept under usual and customary business practices will suffice.

The Airport Manager is responsible for developing written procedures and maintaining them with this SPCC Plan for a period of three years.

Tank inspections are to be completed periodically. An inspection schedule is provided in Appendix D. All aboveground bulk storage tanks (subject to 40 CFR 112) will be visually inspected by site personnel. The inspections consist of a cursory visual inspection of tank and pipe supports and foundation for signs of deterioration, as well as indication of oil leaks from tank seams, gaskets, joints, rivets and bolts, valves, cracked hoses, leaking pumps, etc. Should leaking equipment or spills be detected, the Airport Manager will be notified, and the spill will be contained with absorbent materials to prevent further spreading. Maintenance will be contacted to conduct repairs and cleanup.

In accordance with the Steel Tank Institute (STI) Standard for the Inspection of Aboveground Storage Tanks (SP001) certain tanks greater than 5,001 gallons are required to undergo a formal external inspection by either an STI SP001 certified inspector or an API 653 certified inspector with an adjunct STI SPOO1 certification. As prescribed, a certified inspector will be required to perform a formal integrity test every 20 years. The two 20,000-gallon tanks were built in 2007, therefore a formal external inspection will be due before 2027. The third aboveground Avgas tank was built in 2022; therefore, a formal inspection will be due before 2042. See Appendix E for more information on aboveground tank inspection schedules.

Inspections are documented in the Inspection Checklist (see Appendix D) and are signed by the appropriate individual. Inspection records are kept onsite for a minimum of 36 months. All inspection records and reports are maintained in the Office Building.

11. Personnel Training & Spill Prevention Procedures

(Ref. 40 CFR §112.7(f))

As required by 112.7(f)(1), at a minimum, training of the oil-handling personnel will include the following:

- the operation and maintenance of equipment to prevent discharges;
- discharge procedure protocols;
- applicable pollution control laws, rules, and regulations;
- general facility operations; and
- contents of the facility SPCC Plan.

As required by 112.7(f)(2) the Airport Manager is the designated person at the facility accountable for discharge prevention and reporting to facility management.

As required by 112.7(f)(3), discharge prevention briefings for oil-handling personnel will be scheduled and conducted at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings will highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.

The Boulder City Municipal Airport is committed to providing proper and regular instruction for oil-handling personnel in the operation and maintenance of equipment to prevent discharges of oil, discharge procedures protocols, general facility operations, and the contents of the facility SPCC Plan.

The Airport Manager is responsible for ensuring that oil-handling employees are properly instructed in the operation and maintenance of equipment to prevent oil discharges, discharge procedures protocol, general facility operations, the contents of the facility SPCC Plan, and applicable pollution control laws, rules, and regulations.

The Airport Manager is also responsible for overseeing discharge prevention activities, reporting on the progress of discharge prevention activities to facility management, and conducting discharge prevention briefings at least once a year for oil-handling personnel to ensure adequate understanding of the facility SPCC Plan.

The SPCC Plan is reviewed with operation and maintenance personnel. Records of personnel training are kept as Appendix C.

12. Security

(Ref. 40 CFR §112.7(g), CFR §112.7(e)(9))

The security program as part of the SPCC plan is designed to meet two goals. First, the security plan should prevent security breaches that result in the release of oils, hazardous materials, or toxic chemicals to the environment. The second goal is to effectively utilize the observation capabilities of the security plan to identify actual or potential releases to the environment.

Facility storage tanks are kept inside the property, which is fenced. The facility is staffed during normal hours of operation. All storage areas are well lit during hours of darkness.

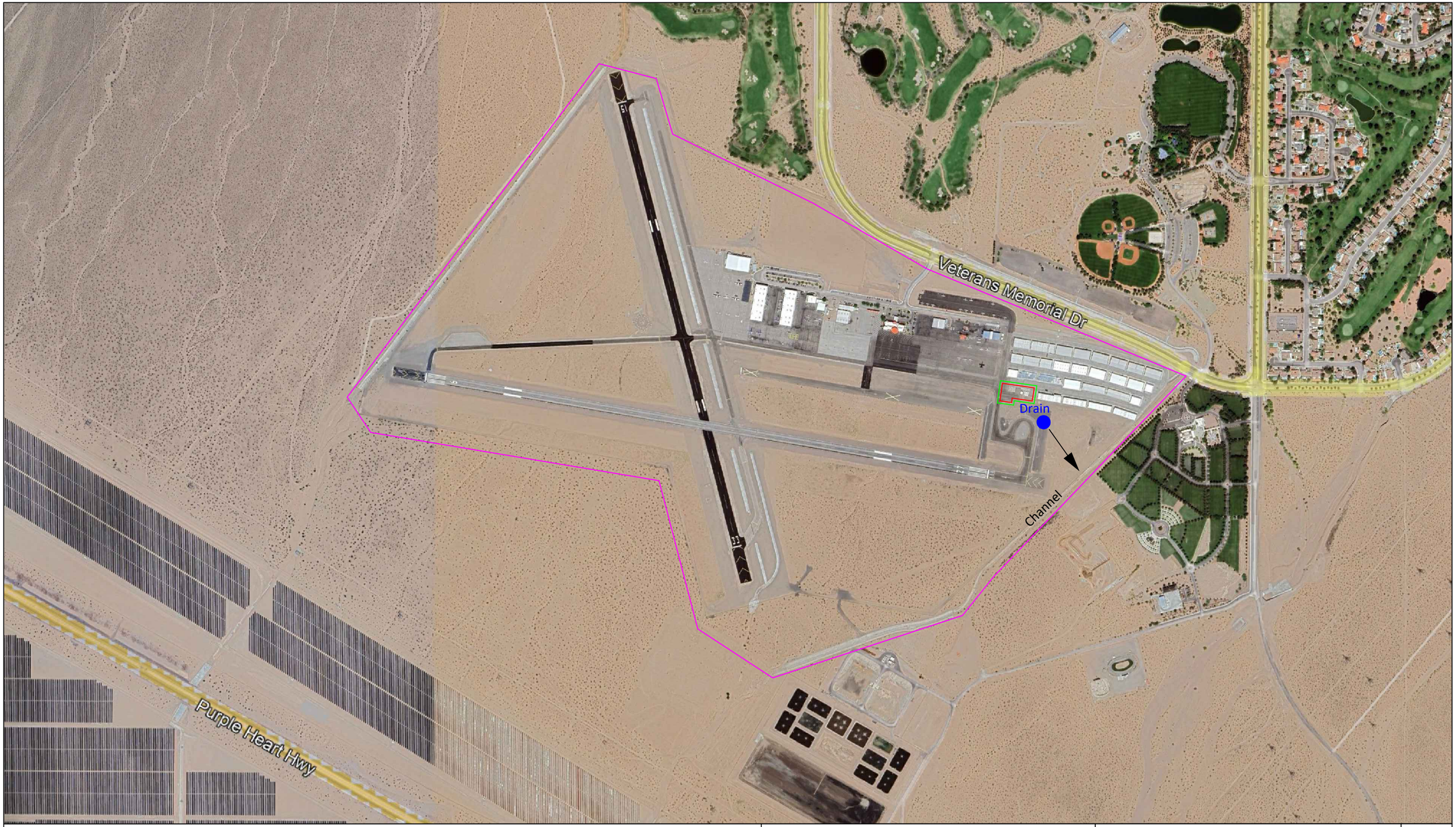
13. Brittle Fracture Evaluation

(Ref. 40 CFR §112.7(i))

If a field-constructed aboveground oil container undergoes a repair, alteration, reconstruction or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe and as necessary, take appropriate action.

There are no field constructed aboveground containers located at the Boulder City Airport; therefore, an evaluation is not needed at this time.

Figures



LEGEND

- Fuel Farm
- Outfall 1
- Property Line
- Potential Pollutant Source
- Stormwater Flow Direction

0 750 1500

SCALE: 1 inch = 750 feet

N

BROADBENT

Prepared by: TM Reviewed by: CAC Date: 07/10/2023

Vicinity Map
Boulder City Municipal Airport
1201 Airport Road, Suite 200
Boulder City, NV 89005

Project No. 18-01-215-201

Figure

1

LEGEND

- ASTs
- Used Oil Drums
- Spill Kits
- Stormwater Flow Direction

0 30 60

SCALE: 1 inch = 30 feet

N

BROADBENT

Prepared by: TM Reviewed by: CAC Date: 07/10/2023

Site Map
Boulder City Municipal Airport
1201 Airport Road, Suite 200
Boulder City, NV 89005

Project No. 18-01-215-201

Figure

2

Appendix A: Certification of Substantial Harm Determination Form

Certification of Substantial Harm Determination Form

40 CFR §112.20(e), 40 CFR §112.20(f)(1)

Facility Name: Boulder City Municipal Airport

Facility Address: 1201 Airport Road, Suite 200 Boulder City, Nevada 89005

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

   Yes_____ No__X__

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within an 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 appropriate formula in C-III to this appendix 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 this part, Section 10, 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 to this appendix or a comparable formula) such that a discharge from the facility 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 greater than or equal to 10,000 gallons within the last five years?

   Yes_____ No__X__

Certification

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

_____ _____

Signature Name (please type or print)

Appendix B: SPCC Plan Review Log

Plan Amendments and Review Log

Non-Technical Amendments

- Examples of changes may include, though are not limited to: phone number, name change, any non-technical text change(s) and any facility reconfiguration that facility management determines does not materially affect the facility's potential to discharge oil.
- A PE does not certify non-technical amendments.

Technical Amendments

- Examples of changes may include, but are not limited to, commissioning or decommissioning containers; replacement, reconstruction or movement of containers; reconstruction, replacements or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or addition/deletion of standard operation or maintenance procedures related to discharge prevention measures. It is the responsibility of the facility to determine and confirm with the regulatory authority as necessary, what constitutes a technical amendment. The preamble of the rule states that an amendment is required only "when there is a change that materially affects the facility's potential to discharge oil" (67 **FR** 47091).
- An amendment made under this section will be prepared within six (6) months of the change and implemented as soon as possible but not later than six (6) months following preparation of the amendment.
- Technical amendments affecting various pages within the plan can be PE certified on those pages, certifying those amendments only, and will be documented on the log form below.
- A PE will certify technical amendments in accordance with 40 CFR §112.5(c).

Management Review

- Management will review this SPCC Plan at least each five (5) years and document the review on the form below (40 CFR §112.5(b)).

By	Date	Activity	PE Certification Required?	Comments
Apex	September 2013	Original Plan	Yes	Original SPCC Plan
Broadbent	August 2018	5-Year Review	Yes	Issue New Plan following review
Broadbent	July 2023	5-Year Review	Yes	Issue New Plan following review

Appendix C: Personnel Training Records

SPILL PREVENTION CONTROL & COUNTERMEASURES (SPCC)
ANNUAL TRAINING SIGN-IN SHEET

DATE: _____

PERSON CONDUCTING TRAINING: _____

PRINT NAME	SIGNATURE

Appendix D: Inspection Forms

Appendix E: STI SP001 ABOVEGROUND TANK INSPECTION SCHEDULE

Category 1: ASTs with Spill Control and CRDM

Category 2: ASTS with Spill Control, and without CRDM

Category 3: ASTs without Spill Control

P = Period Inspection (Monthly)

E = External Inspection

L = Leak Test

I = Internal Inspection

TABLE 5.5 TABLE OF INSPECTION SCHEDULES

AST Type and Capacity in U.S. gallons (liters)		Category 1	Category 2	Category 3
Shop-Fabricated ASTs	0 – 1100 (0-4164 liters)	P	P	P, E&L(10)
	1101 - 5,000 (4168-18,927 liters)	P	P, E&L(10)	[P, E&L(5), I(10)] or [P, L(2), E(5)]
	5,001 - 30,000 (18,931-113,562 liters)	P, E(20)	[P, E(10), I(20)] or [P, E(5), L(10)]	[P, E&L(5), I(10)] or [P, L(1), E(5)]
	30,001 - 75,000 (113,566-283,906 liters)	P, E(20)	P, E&L(5), I(15)	P, E&L(5), I(10)
Portable Containers		P	P	P**

** Owner shall either discontinue use of portable container for storage or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule (refer to Section 9.0):
Plastic portable container - every 7 years
Steel portable container - every 12 years
Stainless Steel portable container - every 17 years