

**Jordanville Wind Farm Operations
Herkimer County, New York**

**DRAFT SPILL PREVENTION,
CONTROL AND
COUNTERMEASURES (SPCC)
PLAN**

40 CFR Parts 110 and 112

April 2007

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1.0 General Applicability, Purpose and Scope of Plan

40 CFR 112.1

This Spill Prevention, Control and Countermeasures (SPCC) Plan has been prepared for the Jordanville Wind Farm Site located in the Towns of Warren and Stark,, Herkimer County, New York in accordance with requirements specified by the United States Environmental Protection Agency (USEPA) under Title 40 Code of Federal Regulations (CFR) Parts 110 and 112. This Plan includes the changes to the SPCC regulations, which were promulgated on July 17, 2002. The Jordanville Wind Farm will be constructed in 2008 and the Jordanville Wind Farm site or “facility” consists of 68 wind turbines, a logistical/operation and maintenance (O&M) Building, and two electrical substations. The Jordanville Wind Farm is located approximately 6.5 miles south of Little Falls, New York.

The wind farm will be comprised of 68 wind turbines, each with an electrical generating capacity of two megawatts providing a total electrical output of 136 megawatts. The 68 wind turbines will be connected together through a subsurface electrical interconnect line which transmits the generated power to the collection electrical substation. At the collection substation, the electricity will then be transformed to 230kV and transmitted to an interconnection substation where it is sold as a commodity to the power company through an adjacent electric transmission line. Figure 1 illustrates the facility layout, with the location of the turbines, the O&M building, the electrical substation, adjacent transmission lines, elevation contours, and the direction of flow in the event of an oil spill. Figures 2 through 71 illustrate the site features adjacent to each wind farm component, the generalized topographic features, and the direction of flow in the event an oil spill would occur.

The facility will have multiple areas of oil storage and use, including electrical transformer oil, gear oil, hydraulic oil, and drummed or containerized oil. The majority of oil stored at the wind farm will be stored in the pad-mounted transformer at the electrical substation and within each of the 68 wind turbine nacelles. Gear oil, hydraulic oil and waste oil are also stored at the O&M Building. Requirements of 40 CFR Parts 110 and 112 specify that a SPCC Plan be developed and implemented for facilities with more than 1,320 gallons of oil stored on site in containers 55-gallons in size or larger. Based on this requirement and the quantities of oil stored/used on-site, the Jordanville facility requires an SPCC plan.

This SPCC Plan describes the equipment, structures and procedures designed to prevent the discharge of oil from the facility into or upon the navigable waters of the United States. This SPCC Plan complies with the provisions of 40 CFR Parts 110 and 112 and has been reviewed and certified by a Registered Professional Engineer familiar

with the site and the SPCC Plan regulatory requirements. The Certification of Applicability of the Substantial Harm Criteria is contained in Appendix B.

This SPCC Plan will be kept on file at the facility's O&M building and will be available for regulatory agency review upon request during normal working hours. This plan will be reviewed once every five years, and amended within six months of the review, if needed. In addition, this plan will be amended within six months of any modification of operations conducted at the facility, if the modification could result in the discharge of oil into or upon the navigable waters of the United States. All amendments to this SPCC Plan will be certified by a qualified, registered, professional engineer.

2.0 Definitions, Facility Information and Personnel

2.1 Definitions

40 CFR 110, 112.2

Discharge: The spilling, leaking, pumping, pouring, emitting, emptying, dumping, etc. of oil (except as allowed under a discharge permit).

Harmful Quantities: Discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in such quantities that it has been determined may be harmful to the public health or welfare or the environment of the United States. This would included, but not be limited to, spills that violate applicable water quality standards or cause a film or sheen upon or discoloration of the surface of the water, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. Also included are spills of polychlorinated biphenyls (PCBs) in any quantity to the water or discharge of 10 pounds or more to the land.

Navigable Waters: For the purpose of this SPCC Plan, navigable waters include any waters of the United States as defined in Section 502(7) of the Federal Water Pollution Control Act.

Oil: Oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, and oil mixed with wastes other than dredged spoil.

Spill Event: A discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities, as defined by 40 CFR 110.

2.2 Facility Information

Name: Jordanville Wind Farm

Type: Wind Farm Electric Power Generation

Location: 6.5 miles south of Little Falls, along County Route 18 in The Towns of Warren and Stark, Herkimer County, New York.

Address: To be determined.

Phone: To be determined.

2.3 Owner/Operator Information

The Jordanville Wind Farm project is being developed and will be owned by Iberdrola Renewable Energies USA, Ltd., who has a long-term lease of the properties for use as a wind farm. Gamesa Wind, US will provide O&M services for the wind farm. Iberdrola will provide the site operations management services for the wind farm.

2.4 Oil Stored

Table 1 summarizes the oil that will be stored at the facility either in containers with at least 55-gallon capacity or in equipment. Maintenance specifications for the Gamesa wind turbines used at the site (Model G8X) are presented in Appendix A including the quantity and types of oils contained within the turbine equipment.

Table 1
Summary of Oil Stored On-Site or Used
In Equipment Subject to SPCC Regulations

Type of Oil	Typical Quantity Stored
Hydraulic Oil (13 turbines)	6,721
Gear Oil (13 turbines)	5,675
Yaw Oil (13 turbines)	141
Substation Transformer	7,200
O&M Building	New and Used oil in 55 gallon drums

2.5 Notification of Personnel

40 CFR 112.7(a)(3)

In the event of a spill or “harmful quantities of oil”, the person observing the spill must notify the Site Environmental Health and Safety (EHS) Coordinator, who will act as the Spill Response Coordinator for the spill cleanup.

The Spill Response Coordinator responsibilities include safety actions and spill containment. Notification procedures that apply to spills of harmful quantities of oil, defined as:

- 1) A discharge causing a film, sheen or discoloration of the surface of water or adjoining shorelines of navigable waters;
- 2) A discharge of more than 1,000 gallons of oil on water or land;

- 3) A discharge causing a sludge or emulsion to be deposited beneath the surface of the water or adjoining shorelines of navigable waters;
- 4) A discharge which violated applicable water quality standards; or
- 5) A spill of PCBs in any quantity to water or 10 pounds or more of PCBs to land.

In the event of a significant spill of oil that does not meet the “harmful quantities” criteria, the Site EHS Coordinator should be notified during normal working hours. If it is possible that any oil will be discharged with stormwater, then the Site EHS Coordinator should be notified as soon as possible, regardless of time of day.

2.6 Designated Facility Personnel

40 CFR 112.7(f)(2)

EHS Coordinator and Spill Response Coordinator

Name: To be determined

Title: Facility Operator

Phone: To be determined

Alternate Spill Response Coordinator

Name: Inigo Malo de Molina

Title: Manager, US Operations

Phone: Cell: (484) 919-4605

2.7 List Of Regulatory Personnel

40 CFR 112.7(a)(3)

National Response Center: 1-800-424-8802

New York State Response Center: 1-800-457-7362

New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233

2.8 Response Contractor

To be determined

3.0 Plan Approval and Certification

3.1 Management Approval

40 CFR 112.7

This SPCC Plan will be implemented as described herein.

(signature)

(Name)

(Title)

3.2 Certification

40 CFR 112.3(d)

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Name:

Registration Number:

State:

Company:

Phone:

Signature: _____ Date: _____

4.0 Spill Protection Plan

4.1 Prior Spills

40 CFR 112.4

The Jordanville Wind Farm site has not recorded a spill of reportable quantities of oil, as outlined in the reporting requirements 40 CDR 112.4, in the past three (3) years. The Jordanville Wind Farm has not yet begun construction or operations.

4.2 Potential Spills

40 CFR 112.7(b)

Oil spills or leaks at the site would most likely occur as a result of four possible events:

- 1) Turbine failures- Ruptures in container walls, turbine bearing failures, turbine gear oil seal failure, oil pan housing failures, etc. may be the result of defective materials, defective workmanship, damage from mobile equipment, corrosion, fire or damage from storms, tornadoes, or high winds. The volume of spill at each turbine could be 184 gallons (from the equipment in the nacelle).
- 2) Overfill/spills during container loading/unloading operations-Oil may be spilled due to accidents involving containers or temporary fuel tanks (vehicles, generators, etc.). These accidents typically include overfilling or spills such as punctures, leaks, corrosion, improper storage, etc. Every effort will be taken during truck unloading activities to prevent damage to petroleum containers, etc. and thus the creation of spills. Temporary or permanent containment structures will be provided, as required. These types of spills are often due to operator error; but sometimes can be the result of defective equipment. These spills are the most common types of spills and spill prevention should be emphasized during employee training.
- 3) Hose failure-A break in piping or a hose will cause the contents to be pumped or drained into containment areas or onto the ground. This failure can occur as a result of damage to the pipe, hose, defective connections, or errors by facility personnel.
- 4) Oil drum/container rupture or puncture-A rupture caused by equipment puncture or corrosion could release oil to the ground. Leakage due to corrosion or loose fittings may also occur.

If a release of transformer oil were to occur from the electrical substation transformer, the oil would be retained in the permanent concrete secondary containment dike. In addition, the oil drum storage rooms in the O&M building

are sloped to a central point with a permanent, sealed concrete sump to collect spilled oil for later removal.

The turbine gearbox and hydraulic station located in the nacelle are not required to have secondary containment. Any potential releases would be detected visually and corrective action implemented. In the unlikely event that a turbine had a release of the entire 184 gallons of oil stored in the equipment, the oil would flow overland for a relatively short distance and would be absorbed into the soils on site or immediately down gradient of the site (see Figures 1 through 71, Spill Route Maps).

There would also be used oil (from a gear box and hydraulic oil change out) stored at the O&M building in a 55-gallon drum. A release of oil from this area would be contained in the sealed, permanent concrete secondary containment structure.

4.3 Spill Containment/Control Equipment and Structures

40 CFR 112.7(c)

The electrical substation transformer will be equipped with a concrete secondary containment structure designed to contain over 100 percent of the transformer oil. The O&M facility/operations building will utilize 55-gallon drums for the storage of oil. Each storage room will have its floor pitched to a central, sealed, permanent concrete sump, which combined with the pitched floor is capable of holding the entire contents of the drum. Bulk petroleum deliveries to the facility for routine operations are in 55-gallon drums or 5-gallon plastic containers which are exempt from the SPCC regulations. Spill kits will be maintained in close proximity to the oil storage containers at the O&M Building. These kits contain several types of oil containment materials including absorbent pads, pig mats, socks and pillows. O&M Building and operations personnel will be trained in the deployment and maintenance of these oil spill materials.

4.4 Facility Drainage

40 CFR 112.7(c) and 40 CFR 112.8(b)

As part of the State Pollutant Discharge Elimination System permit application, a drainage report prepared for the project. This drainage report details specific drainage features existing in the project area. These drainage features are recognized in Figures 1 through 71.

Additionally, oil storage at the wind farm includes oil-filled gear boxes and hydraulics located in the nacelle of each wind turbine. Oil stored within these units is protected from storm water contact.

4.5 Tank Containment and Spill Response

40 CFR 112.7(c) and 40 CFR 112.8(c)

Specific containment and spill response measures concerning oil storage containers at the O&M building are outlined below:

- 1) The 55-gallon drum designated for used oil storage is constructed of materials that are compatible with the contents and the conditions of storage.
- 2) Turbine equipment, the used oil drum, and the transformer are designed to contain the oils stored in them and secondary containment is constructed of non-permeable materials.
- 3) A Storm Water Pollution Prevention Plan has been prepared as part of the State Pollutant Discharge Elimination System permit application.
- 4) The wind farm maintains spill cleanup materials inside the O&M building. The spill kits contain a variety of absorbent materials and equipment that can be used in the event of a spill or leak including petroleum absorbent pad, mats, socks, and pillows.
- 5) All turbines, containers and transformers will be inspected at least weekly. These inspections will be conducted in addition to regular maintenance activities, during which maintenance crews routinely look for signs of deterioration, accumulations of oil, or leaks.
- 6) Facility personnel will be present during unloading of petroleum products. Spill response materials (spill kit) are maintained on-site and should be adequate to control any spill that may occur during unloading of petroleum products.
- 7) Personnel who observe visible oil leaks, which result in a loss of oil from turbine equipment, gaskets, rivets or containers large enough to cause an accumulation of oil shall notify the EHS Coordinator or designee who will then ensure that the equipment is promptly repaired to prevent further leakage.

4.6 Turbine Oil Containment and Spill Response

40 CFR 112.7(c)

- 1) The wind farm will have 68 wind turbines, each of which contains approximately 184 gallons of gear, yaw, and hydraulic oil. The turbines are not required to and do not have secondary containment, but are located on concrete pads allowing visual inspection. Each turbine is inspected from the ground on a weekly basis. In addition, routine O&M activities will be conducted on turbine equipment every six months at which time gear oil, hydraulic oil and yaw oil are topped off or changed out. Additional O&M work completed at this time would include lubrication and filter change outs. The equipment is inspected at that time and documented on inspection forms similar to those contained in Appendix

C. A spill kit, stored at the O&M building, will be used in the event of any leak or spill.

- 2) Personnel who observe visible oil leaks, which result in a loss of oil from the turbine gear box, hydraulic system, or leaking fittings large enough to cause an accumulation of oil on the concrete pad, surrounding soil or on the turbine tower, shall notify the EHS Coordinator or designee. The EHS Coordinator or designee will ensure the turbine is promptly repaired. If the leak is not repairable, the turbine will be removed from service until such time the oil leak can be repaired or the malfunctioning parts can be replaced.

4.7 Transformer Oil Containment and Spill Response

40 CFR 112.7(c)

- 1) The electrical collection substation facility will be equipped with two pad-mounted electrical transformers containing 7,200 gallons of transformer oil. The transformers will be equipped with a concrete secondary containment structure designed to contain the entire contents of the transformer in case of a failure. The transformers will be formally inspected monthly, and these inspections are documented on the inspection forms contained in Appendix C. In addition to the formal monthly inspections, informal inspections will also be performed during the course of each week as part of the routine operations of the site. Based on O&M employee schedules and routine maintenance, any leaks from the equipment should be observed within 48 hours (during the work week) to 72 hours (during the weekend) of occurrence. In addition, sensors within the transformer will provide 24 hour/7 day per week notice of loss of oil. Figures 1, 70 and 15 illustrate the most probable spill route associated with a release from these transformers.
- 2) Personnel who observe oil leaks, which result in a loss of oil from transformer puncture, leakage, electrical failure, leaking fittings, or acts of God, large enough to cause an accumulation of oil in the concrete secondary containment structure shall notify the EHS Coordinator or designee. The EHS Coordinator or designee will ensure the transformer is promptly repaired. If the leak is not repairable, the transformer contents will be transferred to a temporary storage tank and the transformer repaired or replaced.

4.8 Drum Container and Spill Response

40 CFR 112.7(c)

- 1) The facility uses 55-gallon drums and associated secondary containment structures for storage of new and used oil. Unused oil will also be stored in 5-gallon plastic containers, which are exempt from SPCC regulations.
- 2) Personnel who observe oil leaks that result in a loss of oil from drum puncture, leakage, improper drum storage, or leaking fittings and large

enough to cause an accumulation of oil on the floor or in the secondary containment structure shall notify the EHS Coordinator or designee. The EHS Coordinator or designee will ensure that the drum is promptly repaired. If the leak is not repairable, the drum contents will be transferred to another drum or an over pack drum may be used to contain the leaking drum.

4.9 Spill Prevention and Response Procedures

1) Spill prevention procedures

Good Housekeeping measures:

- An effort shall be made to store only enough products required to do the job.
- All materials stored within project areas shall be stored in a neat, orderly manner in their appropriate containers and, if possible, under a roof or other enclosure.
- Products shall be kept in their original containers with the original manufacturer's label.
- Substances shall not be mixed with one another unless recommended by the manufacturer.
- Whenever possible, all of a product shall be used up before disposing of the container.
- Manufacturers' recommendations for proper use and disposal shall be followed.
- The project superintendent shall inspect daily to ensure proper use and disposal of materials.

Additional spill prevention procedures include routine maintenance of facility equipment and storage units and frequent inspection by facility personnel. Facility personnel will inspect containment areas, drum/container storage areas, transformers, and turbines at least once a week and record noticeable changes or conditions. Key personnel will be familiar with and will be instructed to follow this SPCC plan. The facility has a program in place to improve maintenance and/or operation procedures through employee suggestions and management advice.

Hazardous Products

These practices are used to reduce the risks associated with hazardous materials:

- Products shall be kept in original containers unless they are not resealable.
- Original labels and material safety data shall be retained.
- If surplus product must be disposed of, manufacturers' or local and state recommended methods of proper disposal shall be followed.

- Material Safety Data Sheets for all hazardous products shall be within the project area for the duration of construction.

Product Specific Practices

The following product-specific practices shall be followed within the project areas:

Petroleum Products

All project related vehicles shall be monitored for leaks and receive regular preventive maintenance to reduce the chance of leakage. Petroleum products shall be stored in tightly sealed containers which are clearly labeled. Any asphalt substances used during construction shall be applied according to the manufacturer's recommendations.

Fertilizers

Fertilizers used shall be applied only in the minimum amounts recommended by the manufacturer. Once applied, fertilizer shall be worked into the soil to limit exposure to stormwater. Fertilizers shall be stored in a covered or other contained area.

Paints

All containers shall be tightly sealed and stored when not required for use. Excess paint shall not be discharged to the storm sewer system but shall be properly disposed of according to manufacturer's instructions or State regulations.

Concrete Trucks

Concrete trucks shall be allowed to wash out within project areas provided that the contractor provides an area which collects and contains any concrete / slurry material washed from trucks for recovery and disposal at a later time. No concrete / slurry shall be discharged from the property at any time of construction.

2) Spill response procedures

The Jordanville Wind Farm Site will follow the step-by-step procedures outlined below in the event of a spill.

A) Discovery and Notification

The discovery of a spill may be made through the following sources:

- a. Routine preventive maintenance inspection of the equipment by facility personnel;
- b. Detection of a resulting leak or malfunction of equipment; or

c. In conjunction with routine service on the equipment by in-house or other authorized personnel.

Company personnel shall notify the EHS Coordinator or his designated alternate, immediately after a spill incident(s). Upon receiving notification that a spill has occurred, the spill response procedures will be initiated. Response procedures will be coordinated with Local Fire Departments and County Emergency Responders.

The Emergency Spill/Release Response Report used by the facility is contained in Appendix C.

B) Containment and Countermeasures

O&M Building: Should a release occur in the O&M Building, response actions would be based on the estimated volume released. Since there are only a few 55-gallon drums used for oil storage, it is not expected that a significant release would occur in the event of a drum failure. If the drum and secondary containment structure did fail, oil would follow the anticipated oil spill route as shown on Figures 1 and 71.

To prevent discharges from entering waterways, facility personnel, upon the discovery of a breached 55-gallon drum or secondary containment structure, must immediately block the flow of the spill with whatever means necessary to prevent the drainage of oil into the waterway. The blockage may be with absorbent materials (i.e. pigs, booms, etc.), sandbags, concrete sacks, soil, or whatever is the best means available.

Transformers and Turbines: Should a release occur from these locations, response actions would be based on the estimated volume released. The anticipated oil spill route from each turbine location and the electrical substation is presented in Figures 1 through 71.

To prevent discharges from reaching navigable waters, facility personnel, upon the discovery of a leak or spill, must immediately block the flow of the material with whatever means necessary to prevent the drainage of oil into nearby ravines and surrounding soils. The blockage may be with absorbent materials (i.e. pigs, booms, etc.), sandbags, concrete sacks, soil or whatever the best means available is. Small spills may be cleaned up with appropriate absorbent materials. Facility personnel must be aware that rainfall events will expedite the release of any remaining spilled or residual materials, which remain in the release or spill areas.

The above actions are to be taken as soon as the spill report has been verified. The Spill Response Coordinator must coordinate these actions with the regulatory agencies. It is the responsibility of the coordinator to

engage all available resources and to seek the help of a commercial contractor on an as needed basis.

C) Clean-up and Disposal

The EHS Coordinator should supervise the complete spill clean-up operations of contaminated debris and spilled liquid. This phase includes the remove of oils and contaminated debris from water and land. The procedures outlined in this plan will be adhered to and the coordinator should assure that personnel safety procedures are followed.

D) Investigation and Submission of a Report

The EHS Coordinator should investigate the cause of the spill and submit a complete Emergency Spill/Release Response Report to appropriate management personnel (see Appendix C).

E) Post Spill Improvement of the Facility

In coordination with maintenance and construction personnel, the EHS Coordinator will prepare recommendations for improvements at the facility to prevent spills in the future. These recommendations will be submitted to appropriate management for review and approval. The EHS Coordinator will then implement the approved recommendations.

3) Specific Clean-up Activities

In the event oil from a turbine, transformer or container is spilled or leaked into a secondary containment area or on the ground, the oil will be collected or pumped out and removed by facility personnel or a waste oil disposal company who is selected by the EHS Coordinator for this purpose. Small spills or leaks from any area that can be cleaned up by facility personnel will be done so by the use of absorbents and/or removing any visibly contaminated soil. All removed soil and absorbent material will then be placed in approved, properly labeled containers for disposal at an off-site disposal facility.

4) Responsibilities of Spill Response Coordinator

- A) If an oil spill is discovered, facility personnel will immediately notify the EHS Coordinator or his designated alternate. The EHS Coordinator or his designated alternate will act as, or appoint, a Spill Response Coordinator. The Spill Response Coordinator will have the following responsibilities:

- i. Make arrangements for immediate containment of the spilled material, using all means possible including absorbing materials. The Spill Response Coordinator is authorized to mobilize any personnel necessary for clean-up of oil spills and restoration of the affected area.
- ii. Immediately notify facility management of the spill.
- iii. Immediately notify the appropriate regulatory agencies for the following list:
 - 1. If a spill poses a substantial risk to the environment, it is mandatory that it be reported to the National Response Center operated by the U.S. Coast Guard at 800-424-8802. The National Response Center will direct the report to the appropriate EPA environmental emergency office based on the reported location of the spill. Experts from these offices will contact the Spill Response Coordinator in order to evaluate the potential environmental threat and to determine the appropriate spill control and clean-up measures.
 - 2. If there is a fire or danger of a fire, notify the local fire department (call 911).
 - 3. If spilled oil may reach municipal or industrial surface water intakes, the Spill Response Coordinator shall notify the affected facilities.
- iv. Make arrangements for implementation of the clean-up activity as agreed upon and recommended by the EHS Coordinator. The Spill Response Coordinator is authorized to sign a contract with a commercial contractor for spill clean-up.
- v. Oversee clean-up activity.
- vi. Make arrangements for proper storage and eventual disposal of contaminated solid and liquid wastes
- vii. Complete an Emergency Spill/Release Response Report for facility records and, if necessary, submit the necessary information to applicable agencies.

- B) If a spill causes a discharge of more than 1,000 gallons of oil in to navigable waters or if two spill events discharge oil in harmful quantities (as defined in 40 CFR Part 110) into navigable waters within any twelve month period, the facility will then submit the following information to the EPA Regional Administrator within 60 days.
- i. Name of the facility.
 - ii. Names of the owner or operator of the facility.
 - iii. Location of the facility.

- iv. Date and year of the initial facility operation.
- v. Maximum storage or handling capacity of the facility and normal daily throughput (oil, fuel, etc.).
- vi. Description of the facility including maps, flow diagrams, and topographical maps.
- vii. A complete copy of this SPCC Plan with any amendments.
- viii. The causes of the spill including failure analysis of the system or sub-system in which the failure occurred.
- ix. The corrective actions and/or countermeasures taken including an adequate description of equipment repairs and replacements.
- x. Additional prevention measures taken or contemplated to minimize the possibility of recurrence.
- xi. Such other information as the Regional Administrator may reasonably require pertinent to the plan or event.

5.0 Inspection and Records

40 CFR 112.7(e)

Facility operating personnel will regularly inspect all oil storage areas during normal facility operation. In addition, the supervisory personnel will conduct routine inspections of all turbines, the O&M building, the electrical substation and the surrounding areas, noting the condition of the transformers, associated containment structures, drum storage and turbines. Examples of inspection forms are provided in Appendix C. The inspection procedures are a record of the inspections, signed by the EHS Coordinator or designee or inspector, and will be maintained in the facility records in the O&M Building. Records maintained are incorporated by reference and maintained for a period of three years.

6.0 Personnel Training and Records

40 CFR 112.7(f)

The EHS Coordinator should ensure that all personnel are familiar with proper operation and maintenance of equipment to prevent discharges of oil. All personnel should be familiar with applicable pollution control laws, regulations and rules. The EHS Coordinator will schedule periodic spill prevention briefings at intervals frequent enough to assure adequate understanding of this SPCC Plan. These training sessions will include descriptions of known spill events or failures, malfunctioning components, and recently developed precautionary measures.

7.0 Security

40 CFR 112.7(g)

The Jordanville Wind Farm will operate 24 hours a day, seven days a week. Wind farm operations personnel are on-site generally will be between the hours of 7:00 AM to 5:00 PM Monday through Friday. The O&M Building will be locked when staff is not present and the road to this facility will be secured by a locked gate. In addition, the access door to each turbine is locked unless undergoing inspection or maintenance activities. The electrical substations will be surrounded by a chain link fence, barbed wire and a locked gate. Visitors are registered and escorted through the project site, unless the Operations Supervisor or designee waives the escort requirement, such as routine maintenance personnel, landowner guests, etc. Individuals in vehicular traffic granted entry into the wind farm area are warned verbally or by appropriate sign to ensure vehicles do not endanger oil-related equipment. The O&M building and the electrical substation are equipped with sufficient lighting to conduct most clean-up operations.

Appendix A:
Maintenance Specifications for Gamesa Model G8X
Wind Turbine

Appendix B:
**Certification of the applicability of the substantial harm
criteria checklist**

**CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA
CHECKLIST**

Facility Name: Jordanville Wind Farm

Facility Address: To be determined.

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

YES _____ NO _____

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

YES _____ NO _____

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 formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments, see Appendices I, II, and III to the 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 _____

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 (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?

YES _____ NO _____

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

YES _____ NO _____

CERTIFICATION

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

Signature

Title

Name (Please type or print)

Date

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

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2c.

Appendix C
Recordkeeping Forms

Emergency Spill/Release Response Report
Storage Area Inspection Log Sheet
Aboveground Tank Inspection Log Sheet
Spill Response Kit Inspection Checklist

EMERGENCY SPILL/RELEASE RESPONSE REPORT

To be completed by the Spill Response Coordinator and delivered to the EHS Coordinator.

Date of Spill/Release: _____ Time of Spill/Release: _____
Type of material Spilled/Released (Composition): _____
Estimate of quantity of materials Spilled/Released: _____
Exact location of Spill/Release, and if applicable, include the name of waters involved or threatened: _____

Source of Spill/Release: _____

Name, Address, Telephone Number of Responsible Party for Facility:

Company: Iberdrola Renewable Energies USA, Ltd.
Operations Supervisor: Mr. Inigo Malo de Molina
Address: 201 King of Prussia Rd. Suite 500
Radnor, PA 19087
Phone: 484-654-1875

Extent of actual and potential water pollution:

Name, Address, Telephone Number of party at spill site in charge of operations:

Company:
Title:
Address:
Phone:

Description of event:

Steps being taken or proposed to contain and clean spilled material:

Extent of injuries, if any:

Possible hazards to human health and the environment (air, soil, water, wildlife, etc):

Steps taken to prevent recurrence:

OUTSIDE AGENCIES CONTACTED:

_____	_____	_____
Agency	Person Contacted	Time

_____	_____	_____
Agency	Person Contacted	Time

_____	_____	_____
Agency	Person Contacted	Time

Comments: _____

Employees Responding: _____
 Spill Response Coordinator: _____
 Signature: _____

Storage Area Inspection Log Sheet

Location:	
Inspected By:	Title:
Signature:	Date of Inspection:

Drums

1. Any evidence of faulty seals or missing plugs?	YES	NO
2. Any labels missing?	YES	NO
3. Any evidence of corrosion, cracks or bulges?	YES	NO
4. Any drums inadequately secured from tipping or rolling?	YES	NO
5. Any evidence of spills or leaks?	YES	NO

Transformers

6. Any evidence of transformer overheating or malfunction?	YES	NO
7. Any labels missing?	YES	NO
8. Any evidence of corrosion, cracks or bulges?	YES	NO
9. Any evidence of turbine gear/yaw oil or transformer oil spills or leaks?	YES	NO

Indoor Containment Area

10. Any spills or leaks?	YES	NO
11. Excessive debris accumulation?	YES	NO

For any items above which “YES” was checked, please provide description, corrective and containment actions below.

Aboveground Tank Inspection Log Sheet (IF AND WHEN NEEDED)

Tank Identification Number:					
Inspected By:			Signature:		
Title:					
Date of Inspection:			Day:		Night:
Weather:	Clear	Rain	Snow		
Temperature:	<0F	0-32F	33-80F		>80F
Tank Heated:	Yes	No	Tank Insulated:		Yes No

Tank Inspection

1. Drip Mark	YES	NO
2. Discoloration of tank wall	YES	NO
3. Puddles of material stored in tank	YES	NO
4. Corrosion	YES	NO
5. Localized dead vegetation	YES	NO
6. Tank foundation cracks or discoloration	YES	NO
7. Foundation settling or gaps between tank and foundation	YES	NO
8. Foundation damage caused by vegetation roots	YES	NO
9. Evidence of product seepage at valves, fittings or piping	YES	NO
10. Piping corrosion or deflection of pipe between supports	YES	NO
11. Drain valves unlocked or line caps missing	YES	NO
12. Other problems	YES	NO

Secondary Containment Inspection

13. Condition of containment-any cracks or erosion damage	YES	NO
14. Excessive rain water in containment	YES	NO
15. Open or damaged containment drain valves	YES	NO
15. Any discoloration or presence of free product	YES	NO
17. Presence of debris	YES	NO
18. Any evidence of stressed vegetation	YES	NO
19. Lighting adequate	YES	NO

For any items above which “YES” was checked, please provide description, containment and corrective actions below.

Spill Response Kit Inspection Checklist

Location:	
Inspected By:	Title:
Signature:	Date of Inspection:

1. Is the spill kit label missing?	YES	NO
2. Is the spill kit hard to find?	YES	NO
3. Is the spill kit missing:		
Gloves?	YES	NO #if no _____
Goggles?	YES	NO #if no _____
Absorbent Material?	YES	NO #if no _____
4. Is the spill kit open?	YES	NO

For any items above which “YES” was checked, please provide corrective action below.

