

2014 Updates A.S.  
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# **LAFAYETTE AIRPORT COMMISSION LAFAYETTE, LOUISIANA**

## **SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN**

**DECEMBER 2013**

**Prepared by:**

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**C-K Associates' Project No. 9070**



## **ENGINEER'S CERTIFICATION**

I hereby certify that: (i) I am familiar with the requirements of the SPCC rule [Title 40 Code of Federal Regulations (CFR) Part 112]; (ii) I and my agent have visited and examined the facility; (iii) the plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (iv) the procedures for inspection and testing have been established; and (v) the plan is adequate for the facility, with exceptions as noted below.

Alexander Baron Sheffield, P.E.  
Printed Name of Registered Professional Engineer

\_\_\_\_\_  
Signature of Registered Professional Engineer

Registration No. 25165                      State LA

### Noted Exceptions

Many bulk storage containers referenced in this SPCC Plan are owned and operated by airport tenants and fixed based operators (FBOs) of the Lafayette Regional Airport. Therefore adherence to the SPCC rule for these containers is not included nor attested to by this certification.

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## 1.0 INTRODUCTION

The Federal Water Pollution Control Act (FWPCA), as amended by the Clean Water Act of 1977, authorized the establishment of procedures, methods, equipment, and other requirements for the prevention and/or containment of discharges of oil and hazardous substances from vessels and onshore and offshore facilities. In response to this authorization, the U.S. Environmental Protection Agency (USEPA) issued Oil Pollution Prevention Regulations for Non-Transportation Related Onshore and Offshore Facilities on December 11, 1973 (effective on January 10, 1974). These regulations (herein referred to as the SPCC rule) were published under 40 CF, Part 112 (Oil Pollution Prevention), and specifically outlined requirements for the preparation of SPCC plans.

On July 17, 2002, the USEPA published modifications to the SPCC rule in the Federal Register (Volume 67, No. 137, pages 47041-47152). These changes became effective on August 16, 2002. The SPCC rule has been periodically updated with the most recent update on November 5, 2009. This SPCC Plan is in conformance with the updated SPCC rule.

This Plan also includes a prevention and response plan for release of Comprehensive, Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) hazardous substances and extremely hazardous substances listed under the Superfund Amendments and Reauthorization Act (SARA) Title III, Section 302, for which there is a potential for release above the reportable quantity (RQ) or that are stored above threshold planning quantities.

The following sections of this Plan are presented in the sequence of the SPCC rule. The substantive requirements (§§112.7 and 112.8) are addressed in Sections 4 and 5, respectively. Edible oil requirements are addressed in Section 7. In these sections, the exact wording of the rule is provided in italics, followed by an explanation of how the requirements have been addressed.

Spill response in the State of Louisiana is regulated by two different state agencies: the Louisiana Department of Environmental Quality (LDEQ) and the Louisiana Department of Public Safety and Corrections Office of State Police Emergency Response Commission (LDPS).

Chapter 9 of Title 33, ~~Part~~ Part XI of the Louisiana Administrative Code (LAC 33:IX.Chapter 9) contains the LDEQ requirements for contingency planning and implementation of operating procedures and best management practices to prevent and control the discharge of pollutants resulting from spill events.

The federal and state spill regulations each require a specified sequence be followed or a cross-reference be provided indicating where the requirements are met within the plan. Table 1 provides a cross-referencing of federal and state requirements.

LDEQ requires reportable quantities and unauthorized releases be reported in accordance with LAC Title 33, Part I, Chapter 39. Reportable quantities include one barrel (42 gallons) of oil of any kind onto land including but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil. A release of oil into waters of the state that cause a sheen also is reportable. Other RQs for chemicals at the airport may include methyl ethyl ketone (743 gallons); acetone (757 gallons); toluene (138 gallons); and ethylene glycol (537 gallons). In the event of a significant spill or

unauthorized release, the following actions are required:

- The permittee must notify LDEQ Office of Environmental Compliance within 24 hours after learning of the release at (225) 765-0634 between 8:00 a.m. and 4:30 p.m., Monday through Friday, or (225) 342-1324; and
- The permittee must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR 110, 40 CFR 117, and 40 CFR 302, as soon as they acquire knowledge of the release.

Chapter 101 of Title 33, Part V of the LAC (Hazardous Material Information Development, Preparedness, and Response Act) contains the LDPS regulations. The release reporting regulations require that a release of specified substances must be reported immediately if the release meets or exceeds the (release) reportable quantity (RQ) and the release escapes beyond the site of the facility. The release of oils/gasoline/diesel (flammable liquids) in excess of 100 pounds (approximately 13.5 gallons) that leave the site must be verbally reported to the State Police “immediately” (within one hour of discovery) and a written report must be submitted within five days.

## **2.0 GENERAL APPLICABILITY: §112.1**

The Oil Pollution Prevention Regulations (40 CFR Part 112) require preparation of an SPCC plan for facilities that have discharged or could reasonably be expected to discharge oil into or upon navigable waters of the United States or adjoining shorelines.

Specifically, §112.1(d)(2)(ii) requires an SPCC plan to be developed for a facility where the aggregate storage capacity of oil is greater than 1,320 gallons. LFT, located in Lafayette, Lafayette Parish, Louisiana, stores an aggregate quantity of oil greater than 1,320 gallons; therefore, the facility is required to develop, implement, and maintain an SPCC plan in accordance with 40 CFR Part 112.

According to LAC 33:IX.903, Louisiana Spill Prevention and Control regulations apply to LFT because the airport stores oil and the minimum aboveground storage capacity at which Chapter 9 applies is exceeded.

This SPCC Plan has been developed for LFT in response to the regulations listed above. The purpose of this Plan is to identify sources of oil at LFT and outline procedures to prevent the discharge of oil and oil products or hazardous substances to navigable waters of the United States. Discharge of oil is specifically prohibited by law if it affects water quality, causes a film, sheen, or discoloration of the water surface or upon water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the adjoining shorelines. All facilities regulated under 40 CFR Part 112 must conduct an initial screening to determine whether they are required to develop a Facility Response Plan (FRP) under §112.20(e). The Substantial Harm Checklist used to certify that these requirements are not applicable is provided in Appendix A. Because submittal of an FRP is not required, this SPCC Plan provides clear information and procedures for responding to discharges.



### **3.0 SPCC PLAN ADMINISTRATION: §112.3, §112.4, §112.5, AND §112.6**

#### **3.1 Requirement to Prepare: §112.3**

LFT was in operation before August 16, 2002. LFT has maintained an SPCC Plan prior to this date. This SPCC Plan was prepared to amend the previous plan maintained at the facility. In accordance with §112.3(a), this Plan was completed and fully implemented prior to November 10, 2011.

In accordance with §112.3(e)(1) and (2), a complete, updated copy of this SPCC Plan will be maintained at LFT. During normal working hours at the airport, the Plan will be available to authorized representatives of local, state, or federal governing agencies for on-site review and a copy will be submitted if requested.

#### **3.2 Amendment by Regional Administrator: §112.4**

In accordance with §112.4(a), whenever more than 1,000 gallons of oil have been discharged in a single incident or more than 42 gallons of oil have been discharged in each of two incidents over a 12-month period, LFT will submit the following information to the USEPA Regional Administrator (RA) within 60 days:

- §112.4(a)(1): Facility name;
- §112.4(a)(2): Name of designated person accountable for oil spill prevention at facility;
- §112.4(a)(3): Facility location;
- §112.4(a)(4): Maximum storage capacity and daily throughput at facility;
- §112.4(a)(5): Description of corrective action and countermeasures taken;
- §112.4(a)(6): Adequate description of the facility, including maps and flow diagrams;
- §112.4(a)(7): Cause of the discharge(s), including an analysis of the failed system;
- §112.4(a)(8): Description of additional preventive measures taken or contemplated to prevent recurrence; and
- §112.4(a)(9): Other pertinent information.

In accordance with §112.4, copies of the incident report will also be forwarded to the Louisiana Department of Environmental Quality (LDEQ). Should the RA subsequently propose by certified mail or personal delivery that this SPCC Plan be amended, in accordance with §112.4(e), LFT will:

- Submit arguments and supporting information in response to the proposed amendments;  
or

- Amend this SPCC Plan within 30 days and implement the amended Plan within 6 months.

As required by §112.3(d), technical changes made to the Plan will be certified by a Professional Engineer.

The airport has not experienced a discharge of 1,000 gallons of oil in a single incident nor have more than 42 gallons of oil been discharged in each of two incidents over a 12-month period. The airport experienced a spill of 100 gallons of Jet A fuel on September 24, 2004. No off-site impacts occurred. The airport experienced a spill of 100 gallons of oil on September 15, 2006. No off-site impacts were experienced. In 2016, a contractor working on the airport had a release of sealcoat during a rain event. The sealcoat entered the drainage system of the airport. An estimated 62 gallons were released which was a reportable quantity. The spill was reported and cleaned up by LAC. Approximately 1200 gallons of sealcoat impacted waters were removed from the storm drainage system. See Appendix B for a record of any spills at the airport. Other than the spills above, the airport has not experienced any significant oil spills in the last 10 years.

### **3.3 SPCC Plan Amendment by Owner/Operator: §112.5**

In accordance with §112.5(a), when there is a change in facility design, construction, operation, or maintenance that materially affects its potential for a discharge, LFT will amend this SPCC Plan within 6 months of the change and implement the amended Plan within 6 months of its completion. Changes that might require amendment of the Plan include commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. An amendment made under this section must be prepared within 6 months and implemented as soon as possible, but not later than 6 months following preparation of the amendment.

In accordance with §112.5(b), LFT will also review this Plan at least once every 5 years from the date of the last review. As a result of the review, the Plan will be amended within 6 months of the review if more effective prevention and control technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge. The amended Plan will be implemented within 6 months of its completion. The designated person accountable for oil spill prevention at the facility will document completion of each 5-year review, sign a statement as to whether the Plan will be amended, and record the results in Appendix C. Also, see Appendix C for the record of Plan review and changes. As required by §112.3(d), technical changes made to the Plan will be certified by a Professional Engineer.

As required by LAC 33:IX.905(E) and (F), this Plan will be reviewed every 5 years by responsible personnel for conformance with Louisiana Spill Prevention and Control requirements as found in LAC 33:IX Chapter 9. The Plan will be amended within 90 days of the review to include more effective prevention and control technology if such technology for substances subject to LAC 33:IX Chapter 9 will significantly reduce the likelihood of a spill event and if such technology has been field-proven at the time of the review.

### 3.4 Qualified Facility Plan Requirements: §112.6

*(a) Tier I Qualified Facilities – (1) Preparation and Self-certification of Plan. If you are the owner or operator of a facility that meets the qualified facility qualification criteria in § 112.3(g)(1), you must certify in the Plan that:*

- (i) You are familiar with the requirements of this part;*
- (ii) You have visited and examined the facility;*
- (iii) The Plan has been prepared in accordance with accepted and sound industry practices and standards, and with the requirements of this part;*
- (iv) Procedures for required inspections and testing have been established;*
- (v) The Plan is being fully implemented;*
- (vi) The facility meets the qualification criteria set forth under § 112.3(g);*
- (vii) The Plan does not deviate from any requirement of this part as allowed by §§ 112.7(a)(2) and 112.7(d), except as provided in paragraph (c) of this section; and*
- (viii) The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.*

This section does not apply to the facility because a Registered Professional Engineer is certifying the SPCC.

### 4.0 SPCC PLAN GENERAL REQUIREMENTS: §112.7

*If you are the owner or operator of a facility subject to this part you must prepare a Plan in accordance with good engineering practices. The Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. You must prepare the Plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan. If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up.*

Section 4.0 of this Plan presents facility-specific details associated with the general requirements for SPCC plans outlined in §112.7. As previously indicated in Sections 1 through 3, this SPCC Plan has been prepared in accordance with good engineering practice, with management approval at a level with authority to commit the necessary resources for full implementation, and in the sequence of the rule.

#### 4.1 General Facility Information

Facility Name: Lafayette Regional Airport

Facility SIC Code: 4581

Facility Type: Airports, Flying Fields, and Airport Terminal Services

Facility Location: 222 200 Tower Terminal Drive

Lafayette, Lafayette Parish, Louisiana

Latitude: N 30° 12.2" Longitude W 91° 59.3'

Date of Initial Facility Operation: November 1930

Owner Name and Address: Lafayette Airport Commission

222 Tower Jet Ranger X Drive

Lafayette, Louisiana 70508-2159

Designated Person Accountable for Oil Spill Prevention at LFT:

Director of Aviation Executive Director

(337) 266-4401

Designated Environmental Site Leader at LFT:

Environmental Compliance Officer

(337) 266-4484

Designated Persons Responsible for Day-to-Day Monitoring of Activities at LFT:

Deputy Director of Aviation and Operations Specialists

(337) 266-4401

Has facility experienced a reportable oil spill event during the past 12 month? Yes

In 2016, a contractor working on the airport had a release of sealcoat during a rain event. The sealcoat entered the drainage system of the airport. An estimated 62 gallons were released which was a reportable quantity. The spill was reported and cleaned up by LAC. Approximately 1200 gallons of sealcoat impacted waters were removed from the storm drainage system.

#### 4.2 General Facility Description

LFT is located in the eastern portion of Lafayette Parish, Lafayette, Louisiana. According to U.S. Geological Survey topographic map of the Broussard and Lafayette, Louisiana, Quadrangles (1994), the facility lies at an average elevation of 30 feet above mean sea level. Figure 1 depicts the airport location.

LFT is located 2 miles southeast of the city of Lafayette in Lafayette Parish, Louisiana (Figure

1). The facility covers approximately 1,300 acres of land and consists of three asphalt runways: ~~4,099 feet long by 150 feet wide—running southwest/northeast (Runway 22R); 7,651 feet long by 150 feet wide—running southwest/northeast (Runway 22L); and 5,400 feet long by 150 feet wide—running east/west (Runway 29).~~ The unpaved portions of the property, which lie principally on the western and southern edges of the airport, are covered by grass and small trees. Figure 2 shows the layout of the airport with property boundaries, airport structures, and impervious surfaces.

This airport is classified as a commercial service airport in the Louisiana Airport System and has over 127 based aircraft.

LFT has Jet A, 100 low lead (LL) aviation gasoline (AvGas), gasoline and diesel available for sale and offers major repair and maintenance operations 7 days per week in addition to regular scheduled air passenger service.

The airport is approximately 1,300 acres in size, of which approximately 600 acres are fenced and used as an airport, fly field, and airport terminal services. This SPCC Plan addresses the 600-acre portion and the Airports Maintenance Facility. A number of buildings, T-Hangars, a tower, FBOs, several permanent generators, and numerous aboveground storage tanks (ASTs), are located at LFT. Parking at LFT is located on the northwest area of the airport. Airport operations have been conducted at this property since 1930.

The facility does not produce any chemicals, solutions, or emulsions. Miscellaneous lubricating oils used for maintenance purposes and used oil are stored in ~~55-gallon drums~~ 500 gallon tanks and smaller drums and bucket containers in ~~the T-Hangars and~~ various buildings around the airport. Waste oil, waste fuels, waste paint, mineral spirits, miscellaneous solvents, degreasers, antifreeze, and soaps are also stored in ~~55 500 gallon drums tanks~~ and smaller containers in ~~the T-Hangars and in~~ various buildings throughout the airport. Numerous jet fuel, LL AvGas, gasoline, and diesel ASTs used for airport vehicles and airplanes and helicopters are located throughout the facility. Figure 2 presents a site plan that depicts the location of the fuel storage, oil storage, and other material stored and other pertinent facility features.

#### 4.3 SPCC Plan Conformance and Deviations: §112.7(a)(1) and (2)

*(a)(1) Include a discussion of your facility's conformance with the requirements listed in this part.*

*(a)(2) Comply with all applicable requirements listed in this part. Except as provided in §112.6, your Plan may deviate from the requirements in paragraphs (g),(h)(2) and (3), and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2),112.8(c)(11), 112.9(c)(2),112.10(c),112.12(c)(2), 112.12(c)(11),112.13(c)(2), and 112.14(c), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your Plan does not conform to the applicable requirements in paragraphs (g),(h)(2) and (3),and (i)of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c)and (h)(1)of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c),you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in §112.4(d) and (e).*

Many of the storage tanks discussed in this SPCC Plan are owned and operated by the tenants and fixed base operators (FBOs) of the LFT. Therefore, an evaluation of spill containment or adherence to the requirements of §112.1(d)(2)(ii) and §112.7 for any tenant or FBOs is not specifically discussed in regards to conformance within this SPCC Plan. See Appendix B-2 for a list of tenants and their storage tanks.

#### 4.4 Facility Layout: §112.7(a)(3)

*(a)(3) Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must include completely buried tanks that are otherwise exempted from the requirements of this part under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes including intra-facility gathering lines that are otherwise exempted from the requirements of this part under §112.1(d)(11).*

Inside the LFT fenced area, petroleum products are stored in an estimated 19 ASTs and 1 underground storage tank (UST), as shown on Figure 2. Outside of the LFT fenced area, petroleum products are stored in an estimated 19 ASTs and 4 USTs, as shown on Figure 2. See Figure 2 for the layout of the facility and see Appendix B (Worksheet #2), for a complete list of location and contents of containers at LFT. Petroleum ASTs addressed by this Plan are described in the following sections.

#### 4.5 Oil Storage Capacity: §112.7(a)(3)(i)

*(a)(3) You must also address in your Plan: (i) The type of oil in each container and its storage capacity;*

Oil and fuel products stored at LFT include jet fuel, LL AvGas, diesel, gasoline, used oil, lube oil, and hydraulic oil. The airport also stores various solvents in aboveground containers. A summary of the containers, substances, and substance quantities at the airport are provided in Appendix B (Worksheet #2).

#### 4.6 **Discharge Prevention Measures: §112.7(a)(3)(ii)**

*(a)(3) You must also address in your Plan: (ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);*

LFT relies on a number of measures to aid in the prevention of a discharge, including:

- LFT is fenced with 19 gates, eight of which have card readers, for authorized vehicles to enter and exit. All gates are kept closed, locked, and monitored at all times. Airport Police and the Aircraft Rescue and Fire Fighting (ARFF) Department are staffed 24 hours per day, 7 days per week. The Lafayette Sheriff's Department is contracted to monitor the airport. The LFT staff is on site Monday through Friday 4:30am to 10:30pm, and on the weekends from 4:30am to 2:30pm. There is a 24-hour Operations Phone that can be used to contact the individual who is On-Call outside of operating business hours. On a typical day, there will be 18 LFT personnel working at the airport site on the day shift;
- The ASTs are either located within external secondary containment or are double-walled tanks;
- The FBO's mobile fueling trucks, the LFT Operations Department, and the Airport Response and Fire Fighting Department (ARFFD) have spill response kits;
- Inspections are conducted to detect and prevent potential spills; and
- Personnel training programs are conducted to teach proper operating procedures and familiarize staff with the contents and use of the SPCC Plan.

#### 4.7 **Discharge or Drainage Controls: §112.7(a)(3)(iii)**

*(a)(3) You must also address in your Plan: (iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;*

LFT relies on secondary containment features as well as procedures for the control of discharges and drainage for the facility. These controls include the following:

- Double-walled tanks;
- Concrete secondary containment pads, dikes, spill containment pallets, and curbing;
- Spill response equipment (absorbent materials, booms, shovels, etc.) that can be quickly

- deployed once a spill or leak is detected;
- Several Safe Drains have been installed near the T-Hangars; and
- Fuel Farm containment areas are locked to insure storm water is inspected before discharge.

Surface water runoff at LFT is collected throughout the airport in catch basins and open and closed drainage ditches (grass swales and culverts). In general, surface drainage then flows into two borrow pits, Bayou Tortue, Bayou Vermilion, and the Vermilion River. The two borrow pits then discharge into Bayou Tortue. Bayou Tortue flows to the north around the facility into the Vermilion River.

LFT owns and operates **five** wash racks, which are described below and shown on Figure 2. These **five** wash racks are covered by LDEQ's General Permit for Exterior Vehicle Wash Wastewater (No. LAG750655).

- ~~Outfall 001A is Landmark Wash Rack #1 and is located west of Landmark building. This rack is used to wash aircraft and vehicles. This outfall eventually drains to Outfall 002.~~
- Outfall 001B is located next to the 210 John Glenn Drive Hangar. This rack is used to wash aircraft and vehicles. This outfall eventually drains to Outfall 011.
- Outfall 001C is located near the 112B Borman Drive Hangar and is used to wash vehicles and helicopters. This outfall eventually drains to Outfall 011.
- Outfall 001D is located east of the LFT Maintenance Shop and is used to wash vehicles and equipment. This outfall eventually drains to Outfall 002.
- Outfall 001E is located at the Airport Response and Fire Fighting Department (ARFFD) building and is used to wash vehicles. This outfall eventually drains to Outfall 010.
- Outfall 001F is located by Gate 7 and is used to wash aircraft, helicopters, and vehicles. The outfall eventually drains to Outfall 011.

Ten storm water outfalls have been identified at the airport and are depicted on Figure 2. The outfalls are located throughout the facility and are permitted and covered by LPDES Multi-Sector General Permit (MSGP) Number LAR05M152 and LPDES sMS4 Permit Number LAR041025. The following is a description of each outfall:

- Outfall 002 receives runoff from the north side of the property, including the fuel farm and T-Hangars. Outfall 002 discharges into the Vermilion River.
- Outfall 003 receives runoff from the north end of Runway 22R, the north end of Taxiways L and J, and the north end of the perimeter road. Outfall 003 discharges into the Vermilion River.
- Outfall 004 receives runoff from the northeast end of Runway 22L and Taxiway J. Outfall 004 drains into the Vermilion River to the east.
- Outfall 005 receives runoff from the northeast end of Runway 22L and the perimeter road. Outfall 005 discharges into an open ditch that drains into Bayou Tortue and then into the Vermilion River.
- Outfall 006 receives runoff from the smaller borrow pit. The borrow pit receives runoff from the perimeter road, the middle of Runway 22L, the north end of Taxiway F, and Taxiway B. Outfall 006 discharges into Bayou Tortue and then into the Vermilion River.



- Outfall 007 receives runoff from the northeast side of Runway 29. Outfall 007 discharges into Bayou Tortue and then into the Vermilion River.
- Outfall 008 receives runoff from the southwest side of Runway 29. Outfall 008 discharges into Bayou Tortue and then into the Vermilion River.
- Outfall 009 receives runoff from the larger borrow pit. The borrow pit receives runoff from the south end of Runway 22L, Taxiways H and G, cargo area, and the south end of Taxiways J and F. Outfall 009 discharges into Bayou Tortue and then into the Vermilion River.
- Outfall 010 receives runoff from Bell Area, PHI Area, Smaller Fuel Farms and private aircraft hangars. Outfall 010 discharges into an open ditch along U.S. Highway 90 and eventually drains into the Vermilion River to the west.
- Outfall 011 receives runoff from the end of Runway 11, Acadian Ambulance Fuel Tank, the deicing area, and the terminal area. Outfall 011 discharges into a ditch along U.S. Highway 90 and eventually drains into Vermillion River to the west.

There are many areas within the airport that contain fuel and oil storage, as indicated on Figure 2. See below for descriptions of these storage areas:

- **Aircraft, Ground Vehicle, and Equipment Maintenance Areas** - Due to the cleaning and maintenance activities that occur at several of LFT tenant facilities, the potential for spills and non-storm water discharges exists. Most of these activities are performed indoors or under covered roofs to prevent contact with storm water. Recovery of solvents, waste fuels and oils, and other potential pollutant sources (fuel filters, oil filters, etc.) is performed by containing and storing the materials in dedicated drums and tanks for off-site removal.
- **Aircraft Deicing/Anti-icing Operations** - Though LFT very infrequently utilizes deicing fluids due to its location in southern Louisiana, deicing equipment is available at the airport for each of the carriers. Deicing normally occurs on the carrier apron in front of the terminal and on the cargo apron by cargo carriers (Figure 2). The amount of deicing fluid is typically less than 500 gallons per year; therefore, the risk of contaminating storm water is considered to be minimal. The SWPPP provides a summary of deicing materials, usage records, and Safety Data Sheets (SDSs) for the deicers used at the airport.

<b>Deicing Materials</b>				
<b>Name of Company</b>	<b>Storage of Deicer</b>	<b>Amount</b>	<b>Application</b>	<b>Type of Deicer</b>
<del>Continental Express (COEX) Delta Global</del>	<del>By Terminal Building Baggage Area</del>	<del>4 Drums (55 gallons each)</del>	<del>Has a machine to apply deicer</del>	<del>Octaflo EF Concentrate, Type I</del>
<del>Delta Global</del>	<del>By Terminal AC Parking Area</del>	<del>2 Totes (275 gallons each)</del>	<del>Has a machine to apply deicer</del>	<del>Dow UCAR™ PG Aircraft Deicing Fluid Concentrate</del>
<del>FedEx</del>	<del>By Building 29</del>	<del>5 Totes (265 gallons each)</del>	<del>Stored in the deicing truck</del>	<del>KilFrost DF Plus (88) Dilute, Type I</del>
<del>American Eagle</del>	<del>By Gate 10</del>	<del>2 Totes (275 gallons each)</del>	<del>Has a machine to apply deicer</del>	<del>Dow UCAR™ PG Aircraft Deicing Fluid Concentrate</del>

**Material Storage Areas** - LFT and its tenants store soaps, degreasers, oils, paints, and other chemicals for operation and maintenance of aircraft and supporting vehicles/equipment. Most of the material storage occurs indoors and therefore presents little risk of exposure to storm water.

**Transformers** - LAC owns one transformer located in a vault building near Gate 4B. The transformer contains 55 gallons of oil. If the transformer were to leak, the oil would be contained in the vault building.

**Tank Storage Areas** - LFT has one primary fuel farm area, managed by Signature, where the bulk of its tank storage volume capacity is contained. A second private fuel farm is managed by Private Aircraft Hangar/Blue Sky. A third fuel farm is managed by Acadian Ambulance (double-walled AST). A fourth fuel farm is managed by Western Airways Maintenance (UST). These areas have secondary containments and have valves that stay locked and shut until manually opened, if applicable. The storm water inside Signature's fuel farm containment area collects in two oil/water separators (OWSs) and these two OWSs are gradually drained. When the fuel farm managed by Signature is drained, it flows to Outfall 002. If needed, absorbent material or microblaze are utilized to remove small amounts of any oils present in the containment area. Private Aircraft Hangar/Blue Sky also operates two small OWSs. When the containment area storm water is drained from Private Aircraft Hangar, it flows through the OWS and then through Outfall 010. The OWS in the Blue Sky fuel farm area also flows to Outfall 010. Other tank storage areas typically consist of double-walled tanks, emergency generators, etc. with fuels and waste oils stored within secondary containment areas.

**Fueling Areas** - Due to the aircraft and vehicle fueling activities that take place at LFT on a daily basis, there exists the potential for spills to occur. Records for the fuel farms, including maintenance operations and fueling records, are not maintained by LFT. The fixed based

operator (FBO) is responsible for maintaining logs and records of all fueling/defueling operations and maintenance activities. This airport handles jet fuel, 100 LL AvGas, diesel fuel, and various quantities of automotive gasoline. The FBO at LFT is Signature. Signature operates a large fuel farm with four 15,000-gallon jet fuel ASTs, one 15,000-gallon AvGas AST, two 500-gallon waste fuel ASTs, one 500-gallon gasoline AST, and one 500-gallon off-road diesel AST. Several mobile refueler trucks of varying capacity deliver the fuel to the aircraft. No significant spills or leaks have occurred. Private Aircraft Hangar/Blue Sky, a LFT tenant, operates one 12,000-gallon jet fuel AST, two 10,000-gallon jet fuel ASTs, a 2,000-gallon LL AvGas AST, a 10,000-gallon AvGas AST and a 275-gallon AST for waste oil. Several companies also operate fuel storage facilities at the airport. Water that is not normally associated with normal storm water discharges should, at a minimum, be visually inspected by the Fuel Farm Operator prior to release from the fuel farm containment area. Visual inspection should include color, turbidity, smell, and sheen. See LFT's Storm Water Pollution Prevention Plan (SWPPP) for additional details regarding the inspection process. Once the visual inspections indicate that the water is contamination free, it is discharged to the airport drainage system. If there is any indication that the water is not suitable for discharge, the oil is removed or storm water will be collected and disposed of off-site.

Other private companies also operate fuel storage facilities at the airport. Below is a list of items the tenants are storing inside the airfield's fence:

1. Acadian Ambulance stores minimal amounts of miscellaneous soaps, solvents, and oil in a flammable locker inside their building. They also have a 275-gallon used oil tote, a 10,000 jet fuel AST and several drums of soaps, oils, and degreasers. Acadian Ambulance has its own SPCC Plan.
2. Western Airways/Western Airways Maintenance operates one 12,000-gallon UST with jet fuel. The tank is registered with LDEQ. No spill information has been provided. Western Airways Maintenance also stores drums of used oil, hydraulic oil, Varsol, and/or lube oil, which are stored in enclosed stainless steel secondary containment.
3. Delta Global stores drums of used oil and used oil filters on a containment pallet at the terminal building, along with miscellaneous soaps, paints and oils inside a flammable locker.
4. United stores drums of used oil and used oil filters on a containment pallet at the terminal building.
5. Signature operates the airport's main fuel farm that includes one 15,000-gallon AvGas AST, two 500-gallon waste fuel ASTs, one 500-gallon gasoline AST, four 15,000-gallon jet fuel ASTs, and one 500-gallon off-road diesel AST. Signature also has one 12,000-gallon double-walled jet fuel AST located uphill from the fuel farm. Signature has several mobile refueler trucks of varying capacities to deliver fuel to aircraft. Signature also has one mobile refueler with one 100-gallon gasoline AST and one 100-gallon diesel AST. Signature also stores minimal amounts of miscellaneous soaps, paints, solvents, oil, waste oil, and hydraulic oil in drums on a containment pallet and in flammable lockers inside their

- buildings. These tanks are covered under Signature's SPCC Plan and under LAC's SPCC Plan in the event there was no tenant operating the fuel farm.
6. AOG Maintenance, a subtenant of Signature, has a 300-gallon used oil tote and several drums of miscellaneous oils and fuels. AOG Maintenance stores miscellaneous oils, solvents, paints, and alcohols in a flammable locker.
  7. Lafayette ARFFD has three ASTs: one 500-gallon double-walled diesel AST, one 500-gallon double-walled gasoline AST, and one 500-gallon double-walled waste oil AST. Lafayette ARFFD also stores minimal amounts of miscellaneous soaps, paints, and oils in a flammable locker. The tanks are covered under LAC's SPCC Plan.
  8. Private Aircraft Hangar of Lafayette/Blue Sky has 2-10,000-gallon jet fuel ASTs, a 10,000-gallon AvGas AST, a 2,000-gallon LL AvGas AST, a 12,000-gallon jet fuel AST and a 275-gallon AST for waste oil. The Private Aircraft Hangar/Blue Sky ASTs are located in a concrete secondary containment berm, and the 10,000 AvGas AST and 12,000 jet fuel AST in the Blue Sky area are double-walled. Private Aircraft Hangar/Blue Sky has their own SPCC plan.
  9. United Parcel Service (UPS) has one 300-gallon waste oil tank with several drums containing waste oil filters and used absorbent material.
  10. LFT has one 55-gallon transformer within the vault building.
  11. Fedex has several drums of oils, fuels, used oil filters, and waste oils stored within plastic containment pallets.

Below is a summary of materials the tenants are storing outside the airfield's fence but still on LFT's property:

1. Louisiana Technical College has drums containing paint wastes, oils, fuels, and hydraulic fluid in plastic containment diking. They also have numerous small containers of miscellaneous soaps, paints, oils, and solvents in a flammable locker.
2. Lafayette Airport Maintenance has one 500-gallon double-walled gasoline tank, one 500-gallon double-walled AST for diesel storage, one 500-gallon double-walled waste oil tank, and three flammable lockers that contain minimal amounts of soaps, paints, and oil. LFT Maintenance also has drums of crack sealant, fuel, paint waste, antifreeze, used absorbents, and other remediation wastes. LFT Maintenance has not reported any spills. These tanks are covered under LAC's SPCC Plan.
3. Avis Rent-a-Car Company has one 5,000-gallon double-walled AST for gasoline. Avis also stores small containers of miscellaneous soaps and cleaners. Avis has not reported any significant fuel spillage. Avis has its own SPCC Plan.
4. Brenton Investment – Shell Gas Station has one 10,000-gallon and two 6,000-gallon USTs which store gasoline and one 6,000-gallon diesel UST. The USTs are steel tanks that are lined for leak protection. The tanks are registered with LDEQ.
5. The Marine Survival Training Center (MSTC) has one 500-gallon oily water AST, one 250-gallon diesel AST, and two drums of miscellaneous fuels and oil. All containers are in concrete containment. MSTC also has numerous small containers of miscellaneous soaps, paints, oils, and fuels in a flammable locker. MSTC has not reported any significant fuel spills, but had one reportable spill due to busted hydraulic line which impacted the lake.

6. Moss Motors Used Cars has numerous small containers of miscellaneous soaps, paints, lubricants, and fuels in a flammable locker.
7. Petroleum Helicopters, Inc. (PHI) Heliport has two 10,000-gallon double-walled ASTs containing jet fuel. PHI has one 500-gallon mobile fuel truck to deliver fuel to aircraft. The truck is housed at the PHI Main Facility when not in use. PHI has a drum of soap and several drums of used oil and hydraulic fluid stored on spill containment pallets. PHI has several small containers of miscellaneous oils stored in a connex containment box. PHI has its own SWPP and SPCC Plan.
8. PHI Main Facility has one 100-gallon AST for waste kitchen grease, one 500-gallon AST for used oil, one 500-gallon AST for diesel, one 1,000-gallon AST for jet fuel, and one 1,000-gallon AST for diesel. PHI also has several drums of used oil, miscellaneous fuels, gasoline, and hazardous materials (toluene, methyl ethyl ketone, thinners, and paint wastes). All drums are in containment. PHI has one 1,000-gallon mobile fuel truck and one 2,000-gallon mobile fuel truck to deliver fuel to aircraft. PHI has its own SWPP and SPCC Plan.
9. Louisiana Army National Guard (LANG) has one 1,000-gallon used oil AST and one 4,500-gallon diesel AST. Both of the ASTs are double-walled steel tanks. In addition, LANG has a 1,200-gallon mobile refueler for diesel. LANG also has approximately four drums of oil and antifreeze stored on spill containment pallets.
10. U.S. Navy/Marine Reserve Unit has several drums of oil, antifreeze, transmission oil, mineral spirits, and used oil. All drums are in containment pallets. They also have numerous small containers of miscellaneous soaps, paints, oils, and fuels in a flammable locker.
11. ULL Water Ski Team operates one 500-gallon gasoline AST in containment. ULL Water Ski Team has not reported any significant fuel spillage.
12. Vermilionville has one 500-gallon double-walled AST of gasoline and a 100-gallon AST of waste kitchen grease, and several drums of used oil in spill containment pallets.
13. Terminal Restaurant has one 250-gallon used cooking oil AST at the terminal building.
14. Federal Aviation Administration (FAA) has one 2,000-gallon diesel double-walled AST to be used with the emergency generator at the Air Traffic Control Tower (ATCT) during times of power outages. FAA also stores oils, paints, grease, stripper, parts cleaner, pesticides, and solvents in small containers and aerosol cans inside a flammable locker at the ATCT. FAA has one 2,000-gallon diesel double-walled AST at the airport surveillance radar to fuel an emergency generator during times of power outages along with several small containers of oils, greases, herbicides, pesticides, and antifreeze/coolants inside a flammable locker. FAA has one 1,000-gallon diesel double-walled AST at the remote transmitter/receiver to fuel an emergency generator during times of power outages along with drums of used oil stored in covered containment. FAA has its own SPCC plan.
15. Bell has two flammable lockers that contain small containers of paints, solvents, glues, protectants, lubricants, soaps, oils, greases, hydraulic oil, and other oils, and one 55-gallon drum of Naphtha. Bell has its own SPCC Plan.

See Appendix B (Worksheet #2), for a complete list of the material inventory at the airport.

#### 4.8 Countermeasures for Discharge Discovery, Response, and Cleanup: §112.7(a)(3)(iv)

*(a)(3) You must also address in your Plan: (iv) Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);*

It is the responsibility of each employee at the airport to assist in spill prevention by being observant for signs of potential spills. Personnel at the airport may reduce or eliminate the risk of spills by taking direct action to correct the potential spill situation or referring the problem to the Environmental Site Leader or their designee.

Visual inspections of the storage tanks are conducted a minimum of once per shift for signs of deterioration or leaks. If deficiencies are observed, the Environmental Site Leader is contacted and proper corrective measures are followed. In addition to the routine daily visual inspections, spill response equipment and secondary containment structures are regularly inspected.

Spill kits containing absorbent pads and socks are located at the ARFFD. The FBO Landmark as well as LAC Operations Department have spill kits located inside their trucks. Spill kits are also stored at **both most of the fuel** farms.

The airport has adequately trained personnel and equipment to contain and clean up minor to moderate volumes of spilled materials. The airport has a Spill Response Team (the ARFFD and Environmental Compliance Officer) that is specifically trained to respond, contain, and clean up minor volumes of spilled materials. On-site equipment and materials include, but are not limited to, spill kits, shovels, squeegees, dirt, sand, visqueen, some absorbent materials (towels, mops, etc.), a front-end loader, three tractors, two sweeper trucks, and two 4X4 Gator golf carts. The airport keeps an empty drum on hand for collecting spill cleanup materials.

Larger spills are controlled through permanent structures such as containment dikes around the fuel farm. If necessary, temporary structures such as booms or earthen berms can be rapidly deployed or constructed to contain larger spills/releases. In case of a large spill, specific response procedures have been developed (Section 4.11 and Appendix D).

#### 4.9 Recovered Materials Disposal: §112.7(a)(3)(v)

*(a)(3) You must also address in your Plan: (v) Methods of disposal of recovered materials in accordance with applicable legal requirements;*

Materials recovered during a spill event will be appropriately containerized. Soils and other solids will be placed in 55-gallon drums or roll-off containers, as warranted. Liquids will be placed in 55-gallon drums or will be collected in a tank truck using industrial power vacuuming. Recovered materials will be labeled, characterized, and disposed/recycled in accordance with applicable federal, state, and local regulations. The Environmental Site Leader will be responsible for arranging the proper disposal of used spill cleanup materials **generated by LAC. Tenants are responsible for the proper disposal of used spill cleanup materials that they generate.** All of the spilled materials shall be cleaned up or disposed as required by appropriate

regulations.

**4.10 Contact List and Notification Phone Numbers: §112.7(a)(3)(vi)**

(a)(3) You must also address in your Plan: (vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).

The Environmental Site Leader is responsible for determining if a spill must be reported to federal, state, or local regulatory agencies **if LAC is the responsible party for the spill or no responsible party can be identified**. The individual contacting the regulatory agency should ask if other agencies should be notified and if written confirmation of the spill is required. The name and title of the regulatory agency employee accepting the report and the report number should be recorded on a copy of the Spill History form (Appendix B-1) and the Spill Information Report (Appendix E).

If this airport, or one of its tenants, released a listed hazardous substance to the environment in excess or equal to reportable quantities, the following actions are required:

- The permittee must notify the National Response Center at (800) 424-8802, in accordance with the requirements of 40 CFR 110, 40 CFR 117, and 40 CFR 302, as soon as they acquire knowledge of the release. Releases are defined to include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment;
- The permittee must notify the Louisiana State Police at (225) 925-6595 within 1 hour, in accordance with the requirements, as soon as they acquire knowledge of the release;
- In the event of a non-emergency, as defined in LAC 33:I.3917, LDEQ will be notified in accordance with applicable regulations. Reporting can be accomplished by one of the following methods: fill out a report online at <http://www.deq.louisiana.gov/apps/forms/irf/forms/>, or send an email to [spoc@la.gov](mailto:spoc@la.gov), or make a verbal notification by calling the LDEQ Single Point of Contact (SPOC) at (225) 342-1234 as soon as possible; and
- Contact the Lafayette Parish Local Emergency Planning Committee per Emergency Response Procedures and Contacts (Appendix D) at (337) 236-5895.

The Environmental Site Leader or his designee must report to the above agencies any spill that causes a release of harmful quantities of oil into navigable waters or their tributaries. Harmful quantities are defined as sufficient oil to exceed water quality standards, cause a sheen or film on the water surface, or cause a sludge or emulsion beneath the water surface.

The Environmental Site Leader, ~~or~~ his designee, **or the responsible party** will be responsible for preparing spill reports for the regulatory agencies. A report will be submitted to the USEPA and LDEQ within 60 days of a spill that meets one of the following requirements:

- A spill of 1,000 gallons or more in a single discharge to navigable waters; or
- More than 42 gallons in each of two discharges within any 12-month period.

The report will include:

- Name of the facility;
- Owner/operator;
- Facility location;
- Maximum storage or handling capacity at the facility and normal daily throughput;
- Corrective action and countermeasures taken;
- Description of facility including maps, flow diagrams, and topographical maps, as necessary;
- Cause of the discharge including system failure analysis;
- Preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Any other pertinent information.

The contact list and notification phone numbers and requirements are outlined in the Emergency Spill Response Procedures and Contacts, which are provided in Appendix D. A Spill Information Report will be completed. A Spill Information Report is provided in Appendix E.

#### **4.11 Reporting and Notification Procedures: §112.7(a)(4)**

*(a)(4) Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.*

Spills or releases of oil that occur at LFT will be documented and reported internally. In addition, spills that meet the criteria for a “reportable spill” must be reported to the regulatory agencies within the time frames discussed above. In certain cases, a written report must be provided to those agencies within the time limits specified in the table above.

Immediately after detecting a spill or leak, personnel will attempt to stop the source of the spill and then contact the Environmental Site Leader. Other personnel will be alerted of the spill and its location and personnel in the immediate vicinity of the spill will attempt to prevent oil from flowing into a surface water body and/or off the airport property. See Appendix E for a copy of the Spill Information Report. As much of the following information as possible should be provided:

- Location of spill;
- Approximate rate and size of the spill;
- Type of material spilled;
- Surface on which the oil spilled (pavement, soil, etc.);



- Amount of time before the spill will flow into a storm sewer inlet or other drainage pathway;
- Cause of the spill;
- Any damages or injuries caused by the spill;
- Actions taken to mitigate the spill;
- If an evacuation will be required; and
- Any details to assist in determining corrective actions.

Reporting and notification requirements are outlined in the Emergency Response Procedures for spills, which are provided in Appendix D. A Spill Information Report will be completed. A copy of the Spill Information Report is provided in Appendix E. All spills that have occurred which are reportable to a regulatory agency will be recorded on the Spill Information Report and filed in Appendix E. Copies of these records will be maintained on site.

#### **4.12 Oil Spill Response Procedures: §112.7(a)(5)**

*(a)(5) Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.*

The Emergency Response Procedures for spills at LFT are provided in Appendix D.

#### **4.13 Discharge Analysis: §112.7(b)**

*(b) Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.*

Pursuant to §112.7(b), predictions of the direction, rate of flow, and total quantity of material that could be discharged at the airport are summarized below. Natural drainage patterns and surface water features at the site are depicted on Figure 2. The nearest surface water features are the two borrow pits, Bayou Tortue, Bayou Vermilion, and the Vermilion River.

Based on the materials stored and processes utilized at the airport, spill mitigation procedures and response guidelines address the following scenarios:

- Rupture or leaks from the storage tanks;
- Tank overflow/failures;
- Rupture of a fill line or broken connection during filling of the storage tank from a tank truck;
- Rupture or leaks from the oil piping, pumps, and associated equipment; and
- Overturned, leaking, or punctured drums.

The potential for a major spill to impact state waters is low because:

- There are multiple layers of containment;

- LFT’s storm drains are designed to capture spilled material;
- Vehicular traffic/raw material delivery/product shipment is restricted; and
- Employees are well trained in the airport operation and procedures.

Predictions of the direction, rate of flow, and total quantity of material that could be discharged from the airport storage and non-storage areas are presented in Appendix B (Worksheet #3).

The following scenarios were evaluated for discharge potential and substance amount:

<b>Discharge Scenario</b>	<b>Material</b>	<b>Planning Volumes</b>
Small/Average	Diesel/Oil/Solvents/Deicing	5 gallons
Medium	Jet Fuel/LL AvGas/Diesel	3,000 gallons
Large/Worst Case	Jet Fuel/LL AvGas/Diesel	15,000 gallons

The following operations have been evaluated considering spill history, age of equipment, chain reaction failure probability, and proximity to property limits in relation to flow direction in selecting small, medium, and worst case discharge scenarios:

<b>Operation</b>	<b>Discharge Scenario</b>
Aircraft, Runway, Ground Vehicles, and Equipment Maintenance Areas	Small/Average
Deicing Activities	Small/Average
Refueling and Defueling of Aircraft	Medium
Storage Tanks	Large/Worst Case

The chances of catastrophic failure of the storage tanks are remote. Stored materials include jet fuel, LL AvGas, diesel, gasoline, hydraulic oil, lube oil, and used oil, which are non-corrosive materials. All storage tanks are double-walled or located within containment walls, thus reducing the potential for spills. The fuel farm ASTs are located within containment walls. A tank inspection program further reduces the chances of rupture. In addition, LFT has not experienced a AST rupture during its history of operation.

**4.14 Spill Containment: §112.7(c)**

*(c) Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following prevention systems or its equivalent:*

*(1) For onshore facilities: (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (ii) Curbing; (iii) Culverting, gutters, or other drainage systems; (iv) Weirs, booms, or other barriers; (v) Spill diversion ponds; (vi) Retention ponds; or (vii) Sorbent materials.*

*(2) For offshore facilities: (i) Curbing or drip pans; or (ii) Sumps and collection systems.*

Spill kits containing absorbent pads and socks are located at the ARFFD. **Signature** has spill kits located inside their mobile refueling trucks. **Signature** and Private Aircraft Hangar/**Blue Sky** have spill kits in their fuel farms. LAC also has spill cleanup materials in Operations Department vehicles.

This combination of double-walled tanks and tanks within containment walls is deemed appropriate for the facility given the:

- Close proximity of spill response contractors;
- LFT's storm drains being adequately sized to contain a spill;
- Commitment of manpower and personnel to deploy in the event of a release; and
- Frequent (once per shift) inspections that occur throughout the airport.

**4.15 Spill Containment Practicability: §112.7(d)**

*(d)If you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c),112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) to prevent a discharge as described in §112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under §112.20, provide in your Plan the following:*

*(1)An oil spill contingency plan following the provisions of part 109 of this chapter.*

*(2)A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.*

No discussion related to practicability is warranted for structures addressed in the referenced regulatory sections.

**4.16 Inspections, Tests, and Records: §112.7(e)**

*(e)Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

LFT maintains a thorough preventive maintenance program to detect faults in all of its storage tanks. LFT's inspection program is based on the Steel Tank Institute Standard for the Inspection of Aboveground Storage Tanks (SP001). Regular inspections are conducted to identify and correct problems before spills occur. Visual inspections are made by operating personnel during their daily rounds to observe signs of deterioration, potential leaks, and the accumulation of material in the curbed areas. A formal visual external inspection of the tanks is conducted monthly. See Appendix F-1 for a copy of the blank form. Once the inspections have been conducted and the forms are completed, a copy will be maintained in LFT's environmental files. A formal tank inspection is conducted annually. See Appendix F-2 for a copy of the blank form. Once the inspections have been conducted and the forms are completed, a copy will be

maintained in LFT's environmental files.

All signs of leakage or potential leakage are reported to the Environmental Site Leader or his designee. These inspections are performed on a routine basis. Maintenance records are kept of all periodic integrity testing as well as other work on the vessels and equipment for a period of not less than 3 years at the airport.

Water that is not normally associated with normal storm water discharges should be inspected prior to release from the fuel farm containment area. At a minimum, the water should be visually inspected. A visual inspection should include color, turbidity, smell, and sheen. See LFT's SWPPP. Once the visual inspections indicate that the water is contamination free, it is discharged to the airport drainage system. If there is any indication that the water is not suitable for discharge, oil will be removed from water or the storm water will be collected and disposed of off-site.

Tank integrity inspections and testing will be accomplished primarily by visual inspections of the tanks, containments, and foundations. Once the inspections have been conducted and the forms are completed, a copy will be maintained in LFT's environmental files. Individual tenants are responsible for maintaining their own testing results and data. Inspections and other integrity testing (as appropriate) will be in accordance with the procedures in API Standard 653 – Tank Inspection, Repair, Alteration, and Reconstruction, or equivalent testing procedures or Steel Tank Institute Standard SP001 – Standard for the Inspection of Aboveground Storage Tanks. Under the Steel Tank Institute Standard SP001, visual inspections by a certified inspector must be conducted every twenty years for tanks greater than 5,000 gallons but less than or equal to 50,000 gallons. There are no tanks greater than 50,000 gallons at the airport.

Completed inspection forms and training records are stored on site in LFT's environmental files. Copies of all forms and logs will be kept in the airport file for at least 3 years. The airport maintains the following records related to oil and hazardous materials for storage, transfer, and training:

- Inspections – Results of the inspection and testing of oil storage containers and areas, aboveground piping, and appurtenances (Appendix F and environmental files);
- Storm Water Discharge – Dates and times of accumulated storm water discharged from containment areas. See the SWPPP;
- Personnel Training Record – Dates and types of SPCC training given to airport personnel and tenants (environmental files); and
- Spill History – Record of regulatory agency reportable spills that occur at the airport (Appendix B-1).

#### 4.17 Personnel, Training, and Discharge Prevention Procedures: §112.7(f)

*(f) Personnel, training, and discharge prevention procedures.*

*(1) At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.*

*(2) Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.*

*(3) Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.*

Airport personnel and tenants will be trained to be familiar with the SPCC Plan. The Environmental Site Leader or his designee is responsible for implementing and maintaining the SPCC Plan. The Environmental Site Leader will periodically review and update the SPCC Plan, including spill response procedures, and is responsible for arranging annual SPCC training sessions for existing tenants and employees and initial training for new employees and tenants. Any changes to the SPCC Plan will be documented in Appendix C-2.

Annual training for personnel handling oil and hazardous materials is conducted by the Environmental Site Leader or his designee to inform personnel of spill prevention equipment and procedures described in this SPCC Plan. All personnel are trained in the general orientation and operation of the airport prior to working at LFT.

Training emphasizes the following information:

- Contents of the SPCC Plan;
- Requirements of the SPCC regulations and other applicable pollution control laws, rules, and regulations;
- Standard Operating Procedures used to prevent discharges of oil and hazardous materials;
- Visual observation during normal operations to detect the first indications of a leak or spill; and
- Descriptions of past spill events, any currently malfunctioning components, and all recently developed precautionary measures.

Employees and tenants will be trained in the Annual SPCC Refresher Course to report, contain, control, and clean up oil spills. Once the training has been provided to each employee and tenant by the Environmental Site Leader or his designee, the signed training forms will be maintained in LFT's environmental files. The date of training, type of training (~~Initial SPCC or SPCC Refresher training~~), instructor, and names of individuals attending will be recorded.

Training will be conducted annually ~~or whenever new spill regulations are promulgated, existing operating systems are modified, personnel responsibilities are changed, or the SPCC Plan is amended. In addition, safety meetings will continue to be used as a forum to ensure~~

~~understanding of SPCC procedures.~~ Training records will be maintained for a period of no less than 3 years.

**4.18 Security: §112.7(g)**

*(g) Security (excluding oil production facilities). Describe in your Plan how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; and address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.*

LFT is fenced with 19 gates, eight of which have card readers, for authorized vehicles to enter and exit. All gates are kept closed, locked, and monitored at all times. Airport Police and the Aircraft Rescue and Fire Fighting (ARFF) Department are staffed 24 hours per day, 7 days per week. The Lafayette Sheriff's Department is contracted to monitor the airport. The LFT staff is on site Monday through Friday 4:30am to 10:30pm, and on the weekends from 4:30am to 2:30pm. There is a 24-hour Operations Phone that can be used to contact the individual who is On-Call outside of operating business hours. On a typical day, there will be 18 LFT personnel working at the airport site on the day shift.

The starter control on each pump is locked in the "off" position when the pump is in a non-operating or non-standby status. Loading/unloading connections are securely capped or blank-flanged when they are not in service or when they are in standby service for an extended time.

Lighting is provided in all areas of the airport. This lighting is sufficient to provide for the detection of spills during darkness and should deter acts of vandalism that could otherwise result in oil spills.

**4.19 Facility Tank Car and Tank Truck Loading/Unloading Rack: §112.7(h)**

*(h) Facility tank car and tank truck loading/unloading rack (excluding offshore facilities).*  
*(1) Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.*  
*(2) Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.*  
*(3) Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.*

The only loading/unloading rack at the airport is Signature's Fuel Farm. The area where the trucks park to load or unload the fuel does not have curbing but the area slopes back to the secondary containment for the ASTs. If a spill occurred it would initially flow toward the AST secondary containment and into this containment. The secondary containment for the fuel farm is

below grade approximately 21 inches. If a major spill was to occur it would flow to a storm drain, located to the northwest. Within the storm drain there is a catch basin where the spilled material can accumulate and then be removed. The storm drain has two valves to close the drain so the material spilled would not be released to the Vermilion River.

The Landmark Fuel Farm requires trucks to use wheel chocks to prevent the vehicles from departing before the transfer lines are disconnected. Vehicles are also inspected for discharges prior to the vehicle leaving these areas. The Fuel Farm uses a checklist to document inspections. The completed checklists are maintained by Landmark.

#### **4.20 Brittle Fracture Analysis: §112.7(i)**

*(i) If a field-constructed aboveground 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.*

None of the field-constructed aboveground containers have undergone 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. Should these containers undergo repair, alteration, reconstruction, or a change of service, the container will be evaluated for brittle fracture failure potential and appropriate steps will be taken to minimize such potential.

#### **4.21 Applicable Requirements: §112.7(j)**

*(j) In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.*

In accordance with LAC 33:907 (K), responsible airport personnel and tenants will allow properly authorized representative(s) of LDEQ or USEPA to enter the facility and inspect activity areas according to the following protocol:

- Enter facility activity areas where a discharge source is or might be located or in which monitoring equipment or records required by a permit are kept for inspection or sampling purposes. It is understood that most inspections are unannounced and will be allowed to begin immediately, but in no case will begin later than 30 minutes after the time the regulatory agency inspector presents their credentials and announces the purpose(s) of the inspection. It is understood that a delay in excess of 30 minutes will constitute a violation of the Louisiana Water Pollution Control Regulations and that additional time can be granted if the inspector or administrative authority determines that circumstances warrant such action;
- Have access to and copy any records deemed necessary for the enforcement of the Louisiana Water Pollution Control Regulations. If requested records are not available due

to their location in an office that is closed at the time of inspection, the records will be made available as soon as the office is open, but no later than the close of business the next working day;

- Inspect any facility areas, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and
- Sample or monitor for the purposes of ensuring permit compliance, or as otherwise authorized by Act 449 of the 1979 Louisiana Legislature (which established Section 1081 et seq. of Title 30 of the Louisiana Revised Statutes of 1950), any substances or parameters at any location.

When an inspector announces that samples will be collected, the airport will prepare containers for duplicates within 30 minutes. It is understood that if container preparation cannot be accomplished in 30 minutes, the airport waives their right to collect duplicate samples during the event. If the administrative authority requires that sampling proceed immediately, without the additional 30 minutes normally allotted, the inspector will provide the airport with duplicate samples from the event.

The airport will ensure that a representative familiar with the wastewater discharge permit and SPCC Plan will be available either by phone or in person at the airport during all hours of operation. The absence of such on-site personnel familiar with the permit will not be grounds for delaying the initiation of an inspection (except with regard to records contained in offices locked at the time of inspection). Inspectors will be required to abide by all company safety rules.

As deemed necessary, LFT will submit a written request for copies of field notes, drawings, etc., taken by the regulatory agency inspector during an inspection. These copies will be provided after the regulatory agency final inspection report has been completed.

Sections 5 and 9 of this Plan provide further detailed discussions of conformance with the applicable federal and state requirements and other effective discharge prevention used at the airport.



#### 4.22 Qualified Oil-Filled Operational Equipment: §112.7(k)

*(k) Qualified Oil-filled Operational Equipment. The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this sub-section in lieu of general secondary containment required in paragraph (c) of this section.*

*(1) Qualification Criteria—Reportable Discharge History: The owner or operator of a facility that has had no single discharge as described in § 112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in § 112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil discharges as described in § 112.1(b) that are the result of natural disasters, acts of war or terrorism); and*  
*(2) Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must:*  
*(i) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and (ii) Unless you have submitted a response plan under § 112.20, provide in your Plan the following: (A) An oil spill contingency plan following the provisions of part 109 of this chapter. (B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.*

The facility has several generators, air compressors, and pumps that qualify as “oil-filled operational equipment”. All of the oil-filled operational equipment at the airport is provided with general secondary containment; therefore, this section is not applicable.

#### 5.0 REQUIREMENTS FOR ONSHORE (NON-PRODUCTION) FACILITIES: §112.8

Section 5 of this Plan presents facility-specific details associated with the requirements for onshore non-production facilities outlined in §112.8.

##### 5.1 General: §112.8(a)

*If you are the owner or operator of an onshore facility (excluding a production facility), you must: (a) Meet the general requirements for the Plan listed under §112.7, and the specific discharge prevention and containment procedures listed in this section.*

This SPCC Plan conforms with and does not deviate from the requirements of 40 CFR §112.7.

## 5.2 Facility Drainage: §112.8(b)

*(b)(1) Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.*

Specific discharge and drainage controls at LFT are discussed in Section 4.7.

*(b)(2) Use valves of manual, open-and- closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment plant, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii),(iii),and (iv)of this section.*

Containment areas for the fuel farms are equipped with drainage valves that are of a manual, open-and-closed design, and allow for the containment and inspection of contained volumes. The drainage valves for these containment areas are operated under responsible supervision. If there is any indication that the water is not suitable for discharge (i.e., sheen, discoloration, odor, film), oil will be removed from water or the storm water will be collected and disposed of off-site. Specific discharge and drainage controls at LFT are discussed in Section 4.7.

*(b)(3) Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.*

Drainage from undiked areas flows to one of the following locations: Outfalls 002 through 011. The outfalls are routinely visually monitored for quality as required under the facility's LDEQ LPDES MSGP. In the event of a discharge from an undiked area that may migrate toward any of the ten outfalls, temporary containment devices or structures such as booms or earthen berms can be rapidly deployed or constructed to contain spilled substances and prevent the migration to navigable waters. In addition, LFT's storm water drains are adequately sized to contain a spill and allow for the spill to be vacuumed out of the storm water drain before it leaves the site. Additional discharge and drainage controls at LFT are discussed in Section 4.7.

*(b)(4) If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.*

There are drainage controls implemented at LFT and these are discussed further in Section 4.7.

*(b)(5) Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two ‘lift ’ pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility.*

LFT does not treat drainage waters in more than one treatment unit; therefore, no discussion related to §112.8(b)(5) is warranted.

### **5.3 Bulk Storage Containers: §112.8(c)**

Containers used for oil storage at LFT that qualify as bulk storage containers are limited to ASTs, totes, and portable 55-gallon drums. Therefore, the following discussion pertaining to the requirements of §112.8(c) is limited to these containers.

*(c)(1) Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.*

All bulk storage tanks at LFT have been designed in accordance with applicable federal, state, and local regulations. Tanks constructed of welded carbon steel are manufactured in accordance with API 650 design specifications. Tanks constructed of other materials (e.g., plastic, fiberglass) are manufactured in accordance with appropriate design standards.

The tanks, totes, and drums also have protective paint coatings as needed for corrosion protection. Tanks, piping, valves, and other appurtenances are also constructed of materials compatible with the products and associated storage conditions with which they are in contact. Temperature, pressure, concentration, trace contaminants, shelf life, vapor/liquid interfaces, and other characteristics are considered when selecting materials of construction.

*(c)(2) Construct all bulk storage container installations (except mobile refuelers and other non-transportation-related tank trucks), so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.*

All of the ASTs, totes, and drums within the airfield either have appropriate secondary containment or are double-walled. Secondary containment for the fuel farm consists of a concrete dike capable of containing the entire contents of the largest tank plus sufficient freeboard for precipitation, as documented in Appendix B-4. Containment areas are sufficiently impervious to contain discharged oil products.

*(c)(3) Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.*

Drain valves in the diked areas remain closed until storm water in each area is inspected. Retained volumes in diked areas are inspected for evidence of oil, such as film, sheen, or discoloration, prior to draining or manual pumping. The drain valve in the containment area for the fuel farm remains closed under normal operating conditions and is only opened under responsible supervision to drain uncontaminated rainwater. Results of visual inspections and the drainage of uncontaminated rainwater are maintained by and filed by the operators of the **Signature** and Private Aircraft Hangar/**Blue Sky** Fuel Farms.

*(c)(4) Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.*

LFT has one completely buried fiberglass storage tank located on its property, also known as a UST, within the fenced area. The UST is one 12,000-gallon tank, installed on September 7, 1986, that contains jet fuel. The tank belongs to **Frank's Casing Western Airways Maintenance**. The UST suction product lines are fiberglass and the metal components on the dispenser are booted. The release detection method is an automatic tank gauging. The product line is safe suction. The site has a spill bucket and a butterfly valve for overflow protection.

Outside of the fenced area but still on LFT's property, Brenton Investments (the Shell gas station) has four USTs. The USTs consist of one 10,000-gallon gasoline UST, two 6,000-gallon gasoline USTs, and one 6,000-gallon diesel UST. The system is a pressurized system with fiberglass lines and low-level detectors (LLDs). The facility UST system has a spill and overflow ball float and butterfly valves. All of the USTs are steel tanks lined for protection. The gasoline USTs were installed in February 1974 and upgraded in November 1998. The diesel UST was installed in February 1988 and upgraded in November 1998. The site has monitor wells to detect any leaks from the USTs. These wells are inspected annually. These tanks have cathodic protection.

*(c)(6) Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.*

Tanks are observed by airport personnel during operating hours. Informal visual inspections are informally conducted as daily routine duties. Visual external inspections of all LAC-owned ASTs, associated piping and appurtenances, and containers are recommended as a good engineering practice to be conducted monthly at LFT. The formal tank in-service inspection will be conducted annually at LFT. Under SP001 integrity testing will be conducted as appropriate for ASTs where visual inspections indicate issues at LFT. These inspections are documented using the inspection forms found in Appendix F. When necessary, based on visual inspection or monitoring results, tanks are drained, cleaned, inspected, repaired, and/or painted.

*(c)(7) Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.*

There are no internal heating coils at LFT; therefore, the requirements of §112.8(c)(7) do not apply.

*(c)(8) Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii) Direct audible or code signal communication between the container gauger and the pumping station. (iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers. (v) You must regularly test liquid level sensing devices to ensure proper operation.*

The fuel farm tanks are equipped with emergency shut-off valves. Gauges on the tanks are monitored for proper operation during tank loading operations and during formal inspections of the tanks. These gauges are in place to assist in preventing overfilling. Some tanks have level controls, while others are gauged manually.

*(c)(9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).*

Under normal airport operations, storm water and wash water from the six wash racks are the only effluent that is discharged from the airport. Currently, LFT has an LDEQ LPDES MSGP and follows the parameters and requirements identified in that permit to ensure that the effluent limits are not exceeded.

LFT operates **five** wash racks, which are described below and shown on Figure 2. These **five** wash racks are covered by LDEQ's General Permit for Exterior Vehicle Wash Wastewater (No. LAG750655).

- **Outfall 001B is located next to the 210 John Glenn Drive Hangar. This rack is used to wash aircraft and vehicles. This outfall eventually drains to Outfall 011.**
- **Outfall 001C is located near the 112B Borman Drive Hangar and is used to wash vehicles and helicopters. This outfall eventually drains to Outfall 011.**
- **Outfall 001D is located east of the LFT Maintenance Shop and is used to wash vehicles and equipment. This outfall eventually drains to Outfall 002.**
- **Outfall 001E is located at the Airport Response and Fire Fighting Department (ARFFD) building and is used to wash vehicles. This outfall eventually drains to Outfall 010.**
- **Outfall 001F is located by Gate 7 and is used to wash aircraft, helicopters, and vehicles. The outfall eventually drains to Outfall 011.**

*(c)(10) Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.*

Visible oil leaks are reported upon observation so they can be repaired immediately. Measures are taken to minimize and mitigate any observed leaks. Any oil spill is cleaned up immediately by appropriate personnel.

*(c)(11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers and other non-transportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.*

Drums and smaller containers are stored on portable containment pallets, racks, or in flammable cabinets throughout the airport. Most of the drum storage areas are roofed to exclude precipitation. Sufficient volume is available within curbed areas to contain the capacity of the largest single container. Inside LFT's fenced area, the FBO has ~~four~~ **several** mobile refueling trucks used to fuel planes and helicopters.

#### 5.4 Facility Transfer Operations, Pumping, and Facility Process: §112.8(d)

*(d)(1) Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.*

The current buried piping system was installed prior to August 16, 2002. Future installations or replacements of buried piping will be provided with protective wrapping and coating, as appropriate, according to pipe material and construction. Cathodic protection or other corrosion protection will be provided in accordance with 40 CFR Part 280 or applicable state programs approved under 40 CFR Part 281. Exposed lines will be carefully inspected for deterioration. If corrosion damage is observed, additional examination and corrective action is taken, as appropriate.

*(d)(2) Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.*

At the time this Plan was prepared, there were no pipelines at the facility that are out of service or in standby service. If piping is placed out of service or on standby service, the facility connections of transfer points will be capped or blank-flanged, and LFT will ensure that the origin points on these transfer points are marked when they are not in use.

*(d)(3) Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.*

Pipe supports for aboveground pipelines are designed to minimize abrasion and corrosion and to allow for expansion and contraction.

*(d)(4) Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.*

Aboveground valves, pipe supports, pipes, and pipelines are inspected on a regular basis. Informal daily visual inspections are conducted from the ground during normal routine airport rounds. Formal visual inspections of piping associated with ASTs are conducted and documented on an annual basis. The formal tank in-service inspection will be conducted annually at LFT. Integrity testing will be conducted every 5 to 7 years at LFT by the appropriate party (i.e., the tenant or FBOs). When buried piping is modified, relocated, or replaced, or when new buried piping is installed or constructed, integrity and leak testing of those pipes will be conducted.

*(d)(5) Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.*

There are signs posted wherever trucks are loading or unloading regarding the proper procedures. There are railings and barricades in place to protect aboveground piping, equipment, and tanks from damage from vehicular traffic. Proper procedures for fueling and defueling aircraft are found in the LFT Certification Manual, Section VII – Hazardous Materials, which was approved by the Federal Aviation Administration on May 24, 2005.

**6.0 REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES: §112.9**

LFT is not an onshore oil production facility. Consequently, the provisions in §112.9 do not apply.

**7.0 REQUIREMENTS FOR ONSHORE OIL DRILLING AND WORKOVER FACILITIES: §112.10**

LFT is not an onshore oil drilling or workover facility. Consequently, the provisions in §112.10 do not apply.

**8.0 REQUIREMENTS FOR OFFSHORE OIL DRILLING, PRODUCTION, AND WORKOVER FACILITIES: §112.11**

LFT is not an offshore oil drilling, production, or workover facility. Consequently, the provisions in §112.11 do not apply.

**9.0 REQUIREMENTS FOR ANIMAL FATS AND OILS AND GREASES, AND FISH AND MARINE MAMMAL OILS; AND FOR VEGETABLE OILS, INCLUDING OILS FROM SEEDS, NUTS, FRUITS, AND KERNELS: §112.12**

Section 9.0 of this Plan presents the facility-specific details associated with the requirements for edible oils as outlined in §112.12. It should be noted that all edible oil bulk storage containers are owned by tenants and not the airport.

**9.1 General: §112.12**

*If you are the owner or operator of an onshore facility (excluding a production facility), you must: (a) Meet the general requirements for the Plan listed under §112.7, and the specific discharge prevention and containment procedures listed in this section.*

This SPCC Plan conforms with and does not deviate from the requirements of 40 CFR §112.12 except as noted.



## 9.2 Facility Drainage

*(b)(1) Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.*

*(b)(2) Use valves of manual, open-and- closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment facility, you must inspect and may drain uncontaminated retained storm water, as provided in paragraphs (c)(3)(ii), (iii), and (iv) of this section.*

Facility drainage is designed in a manner that drainage from undiked areas subject to spills, flow to drainage ditches throughout the property. The storm water drainage system is a concrete collection drainage ditch and retention pits. Diked storage areas where there is a reasonable possibility of a discharge will remain closed except when draining uncontaminated rain water.

The facility drainage system is adequately designed to prevent a discharge in case there is an equipment failure or human error in operation.

*(b)(3) Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.*

The facility drainage system is adequately designed to prevent a discharge in case there is an equipment failure or human error in operation. The grease and used cooking oil storage containers are within areas with general secondary containment, so drainage potential is minimal.

*(b)(4) If facility drainage is not engineered as in paragraph (b)(3) of this section, equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility.*

Diked storage areas where there is a reasonable possibility of a discharge will remain closed except when draining uncontaminated rain water. Good housekeeping and BMPs are in place to help control any discharge of materials.

*(b)(5) Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two “lift ” pumps and permanently install at least one of the pumps. Whatever techniques you use, you must engineer facility drainage systems to prevent a discharge as described in §112.1(b) in case there is an equipment failure or human error at the facility.*

Drainage is not routed to a treatment system at LFT; therefore this requirement is not applicable.

### **9.3 Bulk Storage Containers**

*(c)(1) Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.*

All construction materials for grease and used cooking oil bulk storage tanks, associated piping and valves, and other appurtenances are compatible with stored products. Temperature, pressure, concentration, trace contaminants, shelf life, vapor/liquid interfaces, and other characteristics are considered when selecting materials of construction.

*(c)(2) Construct all bulk storage container installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.*

The grease and used cooking oil bulk storage containers are not located within sized secondary containment.

*(c)(3) Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.*

The grease and used cooking oil bulk storage containers are not located within sized secondary containment.

*(c)(4) Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.*

LFT has no buried metal storage tanks that are subject to 40 CFR 112; therefore, the requirements of [40 CFR 112.8(c)(4)] do not apply.

*(c)(5) Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.*

LFT does not operate any underground fuel storage tanks for edible oils; therefore, the requirements of [40 CFR 112.8(c)(5)] do not apply.

*(c)(6) Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.*

Each edible oil bulk storage container should be inspected on a regular schedule. Inspections are discussed in Section 5.3. For steel containers 5,000 gallon capacity or less with a continuous release detection (e.g., concrete foundation), monthly visual inspection of bulk storage containers is sufficient. Integrity testing may consist of visual inspection, hydrostatic testing, ultrasonic thickness testing, and/or equivalent integrity testing method by a qualified individual and will address tank supports, foundations, piping and valves.

Records are maintained for a period of not less than three years.

*(c)(7) Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.*

There are no internal heating coils associated with aboveground tanks at LFT; therefore, the requirements of [40 CFR 112.8(c)(7)] do not apply.

*(c)(8) Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii) Direct audible or code signal communication between the container gauger and the pumping station. (iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers. (v) You must regularly test liquid level sensing devices to ensure proper operation.*

All edible oil aboveground storage tanks are filled and/or emptied during active communication with the pumper filling the container.

*(c)(9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).*

This section does not apply because LFT does not have a treatment facility on site.

*(c)(10) Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.*

Visible oil, oil product, or other regulated substance discharges are reported upon observation so they can be controlled and immediately corrected. Measures are taken to minimize and mitigate the spill or leak, and the source of the discharge is repaired or otherwise corrected. Accumulations of oil are promptly removed by responding personnel.

*(c)(11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). Except for mobile refuelers, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.*

Portable edible oil bulk storage containers at LFT are not furnished with sized secondary containment.

**9.4 Facility Transfer Operations, Pumping, and Facility Process: §112.8(d)**

*(d)(1) Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.*

There is no buried piping associated with edible oil bulk storage containers. Should future installations of buried piping be necessary, the buried piping will be provided with protective wrapping and coating, as appropriate, according to pipe material and construction. Cathodic protection or other corrosion protection will be provided in accordance with 40 CFR Part 280 or applicable state programs approved under 40 CFR Part 281. Exposed lines will be carefully inspected for deterioration. If corrosion damage is observed, additional examination and corrective action is taken, as appropriate.

*(d)(2) Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time..*

Future pipelines (if constructed) will be capped or blank-flanged at terminal connections at the transfer point and are marked to indicate flow origin if the piping is out of service or in standby service for an extended time.

*(d)(3) Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.*

Future pipe supports (if constructed) for aboveground pipelines will be properly designed to minimize abrasion and corrosion and to allow for expansion and contraction.

*(d)(4) Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.*

Future aboveground valves, pipe supports, pipes, and pipelines (if constructed) will be inspected on a quarterly basis in accordance with the procedure provided in Appendix F. Routine inspections are visual, external, conducted from the ground, and conducted simultaneously with other container inspections.

*(d)(5) Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.*

Future aboveground piping and terminal connections (if constructed) will be clearly visible and protected from vehicular traffic.