U.S. ENVIRONMENTAL PROTECTION AGENCY
TIER I QUALIFIED FACILITY SPCC PLAN

Tier I Qualified Facility SPCC Plan

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name: Litchfield Solar

Facility Address: 298 Rossi Road

City: Torrington State: CT ZIP: 06790

County: Litchfield Tel. Number: (615) 760 - 4455

Owner or Operator Name: Silicon Ranch Corporation

Owner or Operator Address: 222 Second Avenue South, Suite 1900

City: Nashville State: TN ZIP: 37201

County: Davidson Tel. Number: (615) 760 - 4455

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

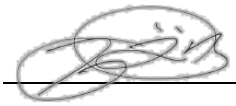
I James Barfield certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112.
2. I have visited and examined the facility.
3. This Plan was prepared in accordance with accepted and sound industry practices and standards.
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices.
5. I will fully implement the Plan.
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
    a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
    b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
    c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping.
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
    a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and.
    b. Must be prepared for operational oil filled electrical equipment, and.
    c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature  Title: Director, Environmental, Health & Safety

Name James Barfield Date: 10 / 28/ 2021

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility**,** if applicable. Implement any SPCC Plan amendment as soon as possible**,** but no later than six months following Plan amendment. Document completion of the review and evaluation and complete the Five-Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	☒
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. *[§112.6(a)(2)]* **[See Technical Amendment Log in Attachment 1.2]**	☒

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities	
This table includes a complete list of all oil storage containers (aboveground containers and completely buried tanks) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.	☒

Oil Storage Container *(indicate whether aboveground (A) or completely buried (B))*	**Type of Oil**	**Shell Capacity (gallons)**
Transformer #1	FR3	600
Transformer #2	FR3	800
Transformer #3	FR3	385
Transformer #4	FR3	600
Transformer #5	FR3	800
Transformer #6	FR3	600
Transformer #7	FR3	500
Transformer #8	FR3	550
Diesel Storage Tank	Diesel	2000

Total Aboveground Storage Capacity [c] 6835 gallons
Total Completely Buried Storage Capacity 0 gallons
Facility Total Oil Storage Capacity 6835 gallons

[an] Aboveground storage container that must be included when calculating total facility oil storage capacity include tanks and mobile or portable containers; oil-filled operational equipment (e.g., transformers); other oil-filled equipment**,** such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

[b] Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

[c] Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is 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.	☒

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge

Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method	Secondary containment capacity (gallons)
Bulk Storage Containers and Mobile/Portable Containers					
Diesel Storage Tank 41°47'40.67"N, 73°10'2.63"W	Refueling operations, external damage	2000	South	Double-walled tank & secondary containment - temp	2750
Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers) [c]					
Transformer #1 41°47'31.83"N, 73°10'4.72"W	Damage to cooling fins, external corrosion	600	East	Oil Spill Contingency Plan	N/A
Transformer #2 41°47'30.31"N, 73° 9'47.80"W	Damage to cooling fins, external corrosion	800	West	Oil Spill Contingency Plan	N/A
Transformer #3 41°47'36.15"N, 73° 9'52.07"W	Damage to cooling fins, external corrosion	385	West	Oil Spill Contingency Plan	N/A
Transformer #4 41°47'36.14"N, 73° 9'51.52"W	Damage to cooling fins, external corrosion	600	West	Oil Spill Contingency Plan	N/A
Transformer #5 41°47'40.74"N, 73° 9'52.11"W	Damage to cooling fins, external corrosion	800	West	Oil Spill Contingency Plan	N/A
Transformer #6 41°47'40.75"N, 73° 9'51.54"W	Damage to cooling fins, external corrosion	600	West	Oil Spill Contingency Plan	N/A
Transformer #7 41°47'39.37"N, 73°10'11.19"W	Damage to cooling fins, external corrosion	500	East	Oil Spill Contingency Plan	N/A
Transformer #8 41°47'56.31"N, 73° 9'47.93"W	Damage to cooling fins, external corrosion	550	East	Oil Spill Contingency Plan	N/A
Piping, Valves, etc.					
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
Other Oil-Handling Areas or Oil-Filled Equipment (e.g., flow-through process vessels at an oil production facility)					

[a] Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

[b] for storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

[c] for oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. *[§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]*	☒

The following is a description of the inspection and/or testing program (e.g., reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:

Silicon Ranch Corporation "SRC" has overall responsibility for this plan and the site EHS representative will review the inspection reports of each responsible subcontractor and perform an audit of these inspections every two weeks. All pertinent SRC personnel have been trained in the requirements of 40 CFR 112.

During construction operations, a Miller Brothers designated employee will inspect Diesel Storage Tank daily and the pad mount transformers weekly for leaks and spills. This inspection will be documented and submitted weekly to SRC EHS representative.

All Miller Brothers personnel will be briefed on the SPCC Plan prior to working at the site, and spill prevention will be a topic discussed at least once per quarter at safety meetings. Miller Brothers instructs its personnel in the operation and maintenance of equipment to prevent discharges of oil. The SPCC training and periodic briefings will highlight and describe on-the-job environmental updates, known spill events or failures, malfunctioning components, and recently developed precautionary measures. With this training, the personnel will recognize the importance of the need for prevention and control of oil spills.

Miller Brothers employees specifically responsible for handling and installation of the oil are thoroughly trained as to the proper techniques that must be used to reduce the probability of an oil spill. Special emphasis is directed toward these employees since the likelihood of an oil spill is more prevalent during this handling process. Maintenance and installation personnel have received basic training in handling hazardous materials and are certified by OSHA.

Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. *[§112.7(e)]*	☒
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. *[§112.7(e)]* **[See Inspection Log and Schedule in Attachment 3.1]**	☒
Inspections and tests are signed by the appropriate supervisor or inspector. *[§112.7(e)]*	☒
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained 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. *[§112.7(f)]*	☒
A person who reports to facility management is designated and accountable for discharge prevention. *[§112.7(f)]* Name/Title: Dee Kohler	☒
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. *[§112.7(f)]* **[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]**	☒

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures	
Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	☒
The following is a description of 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; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges: To prevent unauthorized access, the entire site is surrounded by an 8-foot-high fence inclusive of 2-foot barbed wire topper, and all gates are securely locked. The fence and gates are conspicuously marked with posted signs as a warning to intruders that they are trespassing on private property where dangerous high-voltage equipment is located.	

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines *[§112.7(a)(3)(iv) and 112.7(a)(5)]*:

Personnel shall take the following actions in response to an oil spill event:

1. Protect yourself:
    a. Be aware of electrical hazards
    b. Determine exposure routes from chemical contaminants (if applicable)
    c. Wear and use proper protective gear (glove and eye protection at a minimum)
2. Contain the spill:
    a. Construct earthen berms to divert potential entry into drains and waterways
    b. Use absorbent materials available in the provided spill kits
3. Secure the area:
    a. Isolate the area to prevent access.
    b. Limit entry into the area to authorized personnel wearing appropriate protective gear.
    c. Use plastic over the spill area to prevent additional spreading or human contact.
    d. Post warning signs.
4. Report the spill:
    a. Contact Silicon Ranch Corporation and Miller Brothers EPC who are responsible for effective construction operations of North Stonington Solar with the following information:
        i. Location
        ii. Source of Spill
        iii. Volume of spill
        iv. Extents of spill within the property or beyond
        v. Identification of the equipment
        vi. Individuals known to be in contact with the oil
    b. Miller Brothers EPC will direct crews to the spill site.
    c. Silicon Ranch Corporation will contact the necessary environmental agencies as show in the oil reporting procedure.
5. Proceed with cleanup activities:
    a. For small spills,
        i. Use a sump or other mechanism to remove oil from spill site and place in a sealed 55-gallon drum or spill kit drum.
        ii. excavate the contaminated soil with onsite tools and equipment. Place excavated soil into sealed 55-gallon drums or spill kit drum for proper disposal.
    b. For large spills,
    Contact remediation contractor, Clean Harbors, for soil excavation.

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Clean Harbors – Bristol Technical Services	(860) 583-8917
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: **Dee Kohler** **Silicon Ranch Corporation**	Office: (512) 924-3595
	Emergency: (512) 924-3595
Jim Barfield **Silicon Ranch Corporation**	Office: (704) 985-3316
	Emergency: (704) 985-3316
Peter LaCamera **Miller Brothers**	Office: N/A
	Emergency: (610) 246-1267
	Office:
	Emergency:
State Oil Pollution Control Agencies **Department of Energy and Environmental Protection (DEEP)**	(866) 337-7745 (860) 424-3338
Other State, Federal, and Local Agencies	
Local Fire Department **East Litchfield Fire Department**	911 OR (860) 482-1929
Local Police Department **Connecticut State Police**	911 OR (860) 535-1451
Hospital **Charlotte Hungerford Hospital**	911 OR (860) 496-6666
Other Contact References (e.g., downstream water intakes or neighboring facilities)	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines **[See Discharge Notification Form in Attachment 4]**: *[§112.7(a)(4)]*	☒

- The exact address or location and phone number of the facility.
- Date and time of the discharge.
- Type of material discharged.
- Estimate of the total quantity discharged.
- Estimate of the quantity discharged to navigable waters.
- Source of the discharge;
- Description of all affected media.
- 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
- Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve-month period

You must submit the following information to the RA:

(1) Name of the facility.
(2) Your name.
(3) Location of the facility.
(4) Maximum storage or handling capacity of the facility and normal daily throughput.
(5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements.
(6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary.
(7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
(8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
(9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

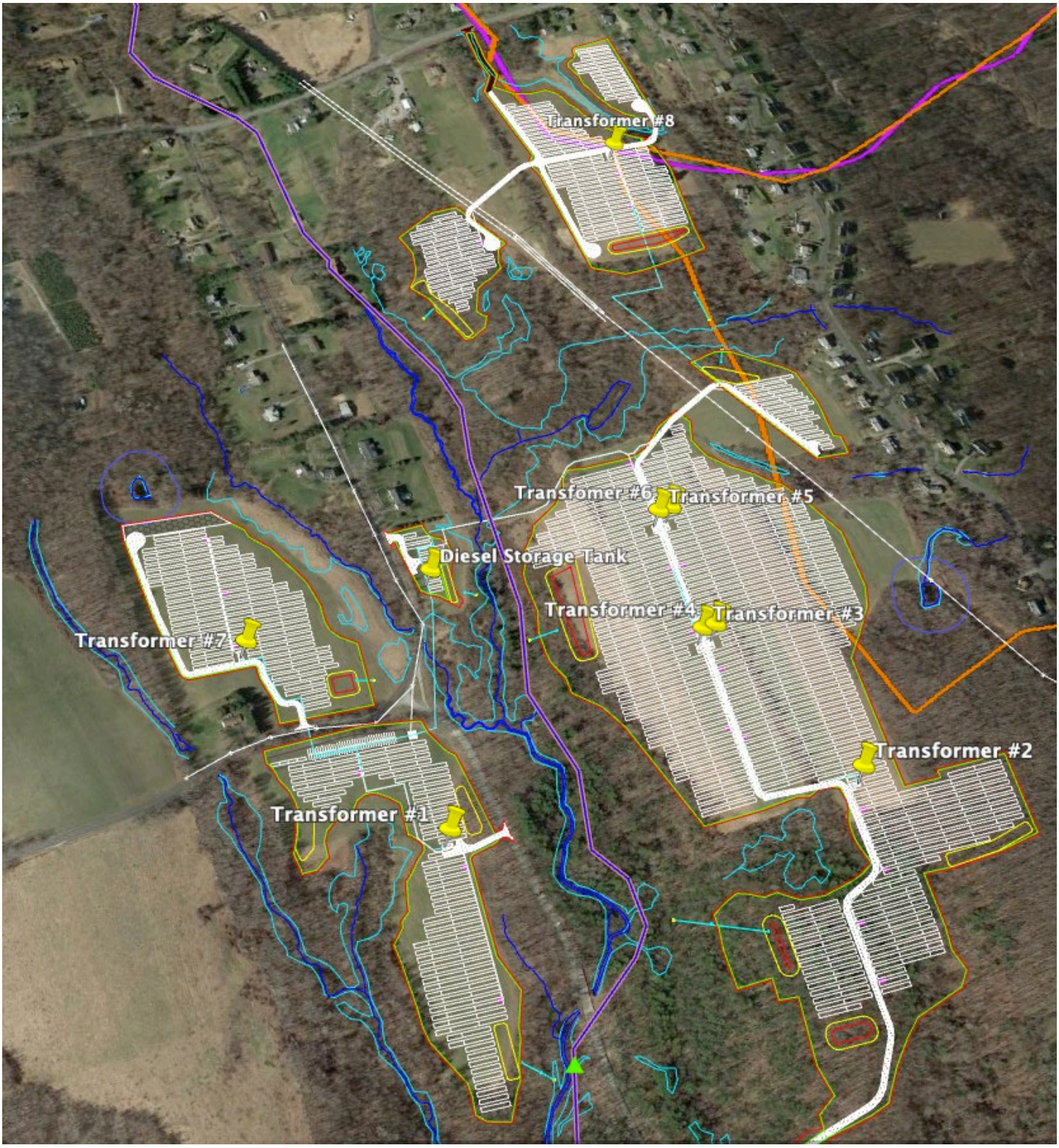
* * * * *

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained 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. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. *[§§112.8(b)(1) and 112.12(b)(1)]*	☐	☒
Valves of manual, open-and-closed design are used for the drainage of diked areas. *[§§112.8(b)(2) and 112.12(b)(2)]*	☐	☒
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. *[§§112.8(c)(1) and 112.12(c)(1)]*	☒	☐
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). *[§112.6(a)(3)(ii)]*	☒	☐
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: *[§§112.8(c)(3) and 112.12(c)(3)]*		
• Bypass valve is normally sealed closed	☐	☒
• Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines	☐	☒
• Bypass valve is opened and resealed under responsible supervision	☐	☒
• Adequate records of drainage are kept **[See Dike Drainage Log in Attachment 3.3]**	☐	☒
For completely buried metallic tanks installed on or after January 10, 1974, at this facility *[§§112.8(c)(4) and 112.12(c)(4)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
• Regular leak testing is conducted.	☐	☒
For partially buried or bunkered metallic tanks *[§112.8(c)(5) and §112.12(c)(5)]*:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	☐	☒
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.8(c)(6) and §112.12(c)(6)(i)]*	☒	☐
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(c)(6) and 112.12(c)(6)]*	☒	☐
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. **[See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2]** *[§112.12(c)(6)(ii)]*	☐	☒

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Procedure **A. (For vehicle and equipment fueling)** 1. The vehicle engine shall be off. 2. Prior to fueling, the valve on any secondary containment shall be closed and any nearby basins covered with the provided flexible rubber mat. 3. Ensure that the fuel is the proper type of fuel. 4. Verify that absorbent spill clean-up materials and spill kits are available in the fueling area. 5. Nozzles used in vehicle and equipment fueling shall be equipped with an automatic shut-off to prevent overfill. 6. Fuel tanks shall not be "topped-off". 7. Clearly post in a prominent area of the fueling area, instructions for safe operation offueling equipment, and appropriate contact information for the person(s) responsible for spill response. 8. Clearly label fuel pump master shut-off switch and maintain clear and easy access 9. Fuel may only be dispensed by a trained and designated employee. 10. When not in use and if practical, the pump is to remain locked. During normal workinghours, the pump key is to be stored by project supervision. **Spill Response** 1. Conduct cleanups of any fuel spills immediately after discovery. 2. Uncontained spills are to be cleaned using dry cleaning methods only. Spills shall be cleaned up with a dry, absorbent material (e.g., kitty litter, sawdust, etc.) and absorbent materials shall be collected and place in a container for disposal. 3. Collected waste is to be disposed of properly. 4. Contact the Silicon Ranch Corporation EHS&S Department to report. **Maintenance and Inspection** 1. Fueling areas shall be inspected daily. 2. Keep an ample supply of spill cleanup material on the site. 3. Any equipment, tanks, pumps, piping and fuel dispensing equipment found to be leaking or in disrepair must be repaired or replaced immediately.	☒	☐
Liquid level sensing devices are regularly tested to ensure proper operation **[See Inspection Log and Schedule in Attachment 3.1]**. *[§112.6(a)(3)(iii)]*	☐	☒
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 are promptly corrected and oil in diked areas is promptly removed. *[§§112.8(c)(10) and 112.12(c)(10)]*	☒	☐
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☒
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. **[See Inspection Log and Schedule in Attachment 3.1]** *[§§112.8(d)(4) and 112.12(d)(4)]*	☐	☒


Transformer #8
Transfomer #6
Transformer #5
Diesel Storage Tank
Transformer #4
Transformer #3
Transformer #7
Transformer #2
Transformer #1

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
	☐	☐	
	☐	☐	
	☐	☐	
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ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments

Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Qualified oil-filled operational equipment which has no secondary containment.

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is attached to this Plan.	☒

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5) [a]	
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	☒
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	☒
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	☒
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	☒
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	☒
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	☒
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	☒
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	☒
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	
(1) Specification of an oil discharge response operating team consisting of trained, prepared, and available operating personnel.	☒
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	☒
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	☒
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	☒
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	☒
(6) Specific and well-defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	☒

[at] the contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule

This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (Or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately [a]
					☐
					☐
					☐
					☐
					☐

[a] Indicate in the table above if records of facility inspections are maintained separately at this facility.

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule

Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection	Visually inspect daily for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

[an] Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.3 – Dike Drainage Log

Table G-18 Dike Drainage Log

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		
	☐	☐	☐	☐		

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log		
Date	**Description / Scope**	**Attendees**

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time ☐ Cleanup contractor (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (Specify) Time ☐ Other (Specify) Time		

Silicon Ranch Corporation
Litchfield Solar Facility
OIL SPILL CONTINGENCY PLAN

PART I
Introduction

1.1 Purpose and Scope

This Oil Spill Contingency Plan is prepared in accordance with 40 CFR 112.7(d) to address areas of the facility where secondary containment is impracticable, as documented in the facility Spill Prevention, Control, and Countermeasure (SPCC) Plan.

The purpose of this Oil Spill Contingency Plan ("Contingency Plan") is to define procedures and tactics for responding to discharges of oil into navigable waters or adjoining shorelines of the United States, originating more specifically from flowlines at Silicon Ranch's Litchfield Solar Facility. The Contingency Plan is implemented whenever a discharge of oil has reached, or threatens,navigable waters or adjoining shorelines.

The objective of procedures described in this Contingency Plan is to protect the public, Silicon Ranch, subcontractor personnel, and other responders during oil discharges. In addition, the Plan is intended to minimize damage to the environment, natural resources, and facility installations from a discharge of oil. This Oil Spill Contingency Plan complements the prevention and control measures presented in the facility's SPCC Plan by addressing areas of the facility that have inadequate secondary containment and impacts that may result from a discharge from these areas. Areas lacking adequate containment at the Litchfield Solar Facility include the (8) pad mounted oil-filled electrical transformers due to infeasibility of transformer containment.

This Oil Spill Contingency Plan follows the content and organization of 40 CFR part 109 and describes the distribution of responsibilities and basic procedures for responding to an oil discharge and performing cleanup operations.

1.2 Resources at Risk - *40 CFR 109.5(b)(1)*

Silicon Ranch's Litchfield Solar Project is located approximately 2.7 miles East of Torrington, CT, within the Housatonic watershed (see Figure C-1 in Appendix C).The waterway closest to the facility is the Naugatuck River, which flows approximately approximate 2 miles to the East of the facility, in a North to South direction and receives water from Gulf Stream which receives water from the unnamed stream that bisects the project. The facility diagram included in Appendix C (Figure C-2) indicates the location of the oil containing pad mounted transformers and diesel storage tank. Ground cover at the facility consists of compacted soil, gravel, and low-lying vegetation.

The site can be divided into two sections (East and West) by a geological depression running north to south and contains the unnamed stream. The natural topography of the West section land drains in an easterly direction, while the eastern section drains to the West. Surface drainage from the facility therefore flows towards the unnamed stream that flows south of the site to flow into Gulf Stream.

There are several residences within the immediate vicinity of the facility (<0.25 miles). The closest residences are located .05 mile to the north and west of the site. All residences appear to have private drinking water wells. SRC will coordinate with the Torrington fire and/or police department and with its residential neighbors to provide the appropriate warnings ithe event of a discharge that could affect public health and safety.

1.3 Risk Assessment - *40 CFR 109.5(c)(2)*

The facility is comprised of approximately 8 pad mounted electrical transformers filled with varying amounts of FR3 oil (385 gal to 800 gal) and one 2000-gallon diesel storage tank for refueling of equipment. All transformers and tanks are above ground. The pad mounted transformers do not have secondary containment as it would be impractical given the multiple conduit penetrations below the equipment. The diesel storage tank has both a double-lined tank and secondary containment adequate to capture flow if the tank is damaged. The daily usage rate of diesel is currently unknown but estimated to be less than 500 gallons. There is no daily usage for the oil filled equipment that is the pad mounted transformers.

A discharge of oil could potentially reach the unnamed stream in the center of the property. The velocity of oil over land is estimated, based on experience and a simple calculation of flow over short grass pastureland, at approximately 0.2 feet/second. Considering the distance between Transformer #1 and/or 2000-gallon diesel storage tank and the unnamed stream to the west (405 feet) and an assumed 2-foot elevation gradient, the oil, if unimpeded, could reach the unnamed stream in as little as 0.5 hours.

1.4 Response Strategy

SRC personnel and contractors are equipped and trained to respond to certain "minor discharges" confined within the facility. Minor discharges can generally be described as those where the quantity of product discharged is small, the discharged material can be easily stopped and controlled, the discharge is localized, and the product is not likely to seep into groundwater or reach surface water or adjoining shorelines. Procedures for responding to these minor discharges are covered in the SPCC Plan.

This Contingency Plan addresses all discharge incidents, including those that affect navigable waters or during which the oil cannot be safely controlled by facility personnel and confined within the boundaries of the facility. Response to such incidents may necessitate the assistance of outside contractors or other responders to prevent imminent impact to navigable waters.

PART II
Spill Discovery and Response

2.1 Distribution of Responsibilities - *40 CFR 109.5(a), 40 CFR 109.5(d)(2), & 40 CFR 109.5(b)(2)*

Silicon Ranch Corporation has the primary responsibility for coordinating the initial response to oil discharge incidents originating from its facility through its contractor Miller Bros. To accomplish this, SRC has designated the Field Operations Manager, TO BE DETERMINED, as the qualified oil discharge response Coordinator (RC) in the event of an oil discharge.

The RC plays a central coordinating role in any emergency, as illustrated in the emergency organization chart in Figure 2-1.

The RC has the authority to commit the necessary services and equipment to respond to the discharge and to request assistance from Torrington fire and/or police departments, contractors, or other responders, as appropriate.

The RC will direct notifications and initial response actions in accordance with training and capabilities. In the event of a fire or emergency that threatens the health and safety of those present at the site, the RC will direct evacuations and contact the fire and/or police departments.

In the event of an emergency involving outside response agencies, the RC's primary responsibility is to provide information regarding the characteristics of the materials and equipment involved and to provide access to the SRC Director of EHS&S as requested. The RC shall also take necessary measures to control the flow of people, emergency equipment, and supplies and obtain the support of the Torrington Police Department or Connecticut State Police as needed to maintain control of the site. These controls may be necessary to minimize injuries and confusion.

Finally, the RC serves as the coordinator for communications by acquiring all essential information and ensuring clear communication of information to emergency response personnel. The RC has access to reference material at the field office either asprinted material or on computer files that can further assist the response activities.

Whenever circumstances permit, the RC transmits assessments and recommendations to SRC Senior Management for direction. Senior Management is contacted in the following order: (1) Vice-President - Projects; (2) Sr. Vice-President of Project Delivery; (3) Sr. Vice-President of Operations.

If the Field Operations Manager is not available, the responsibility and authority for initiating a response to a discharge rest with the EHS Site Construction Manager or most senior Miller Bros. EPC representative on site at the time the discharge is discovered.

2.2 Response Activities- *40 CFR 109.5(d) & 40 CFR 109.5(e)*

In the event of a discharge, the first priority is to stop the product flow and to shut off all ignition sources, followed by the containment, control, and mitigation of the discharge. This Contingency Plan breaks actions to be performed to respond to an oil discharge into different phases, described in greater detail in the checklists below.

2.2.1 Discharge Discovery and Source Control

Minor Discharge. A minor discharge (i.e., small volume leak from flowlines or other equipment) will be discovered by SRC or Miller Bros. personnel during scheduled daily or monthly visits to the facility. Aboveground diesel fueling stations are visually inspected formally once a day during the normal inspection rounds. Pad mounted oil filled transformers will be inspected once a week during normal inspection rounds.

Major Discharge. A more severe and sudden discharge will be the result of an accident involving catastrophic damage to the storage containers and will be detected and reported immediately.

Notifications to the National Response Center, Connecticut authorities, and Litchfield's Emergency Committee must occur immediately upon discovery of reportable discharges.

Completed	Actions
	Immediately report the discharge to the RC, providing the following information: • Exact location; • Material involved; • Quantity involved; • Topographic and environmental conditions; • Circumstances that may hinder response; and • Injuries, if any.
	Retrieve onsite spill response kits and deploy to the site of the spill
	Using appropriate methods equipment stop the flow of oil from storage containers and stem and surface flow from farther progress across site.

2.2.2 Assessment and Notifications

Completed	Actions
	Investigate the discharge to assess the actual or potential threat to human health or the environment: • Location of the discharge relative to receiving waterbodies. • Quantity of spilled material. • Ambient conditions (temperature, rain). • Other contributing factors such as fire or explosion hazards; and • Sensitive receptors downstream.
	Request outside assistance from local emergency responders, as needed.
	IF NEEDED Notify immediately: • 911 • National Response Center • Response contractor(s) – Clean Harbors – Chattanooga, TN • Litchfield County Emergency Planning Committee • State authorities
	Communicate with neighboring property owners regarding the discharge and actions taken to mitigate the damage.
	If the oil reaches (or threatens to reach) the Nolichucky River, notify the local fire/policedepartments to limit access to the River by local residents until the oil has been contained and recovered. Additionally, notify downstream water users of the spill and of actions that will be taken to protect these downstream receptors.

2.2.3 Control and Recovery

The RC directs the initial control of the oil flow by SRC and/or Miller Bros. personnel. The actions taken will depend on whether the oil has reached water or is still on land. All effort will be made to prevent oil from reaching water.

If the oil has not yet reached water:

Completed	Actions
	Deploy sandbags and/or absorbent socks downgradient from the oil, or erect temporary barriers such as trenches or mounds to prevent the oil from flowing towards the unnamed creeks on the western and southern sides of the property.
	Implement land-based response actions (countermeasure) such as digging temporary containment pits, ponds, or curbs to prevent the flow of oil into the river.
	Deploy absorbent sock and sorbent material along the shoreline to prevent oil from entering waters.

If the oil has reached water:

Completed	Actions
	Contact cleanup contractor(s).
	Deploy floating booms immediately downstream from the release point. Big Bear Creek is narrow and shallow. Floating boom deployment does not require the use of a boat.
	Control oil flow on the ground by placing absorbent socks and other sorbent material or physical barriers (e.g., “kitty litter,” sandbags, earthen berm, trenches) across the oil flow path.
	Deploy additional floating booms across the whole width of the Creek at the next access point downstream from the release point.
	Deploy protective booming measures for downstream receptors that may be impacted by the spill.

2.2.4 Disposal of Recovered Product and Contaminated Response Material

The RC ensures that all contaminated materials classified as hazardous waste are disposed of in accordance with all applicable solid and hazardous waste regulations.

Completed	Actions
	Place any recovered product that can be recycled into the secure containers to beseparated and recycled.
	Dispose of recovered product not suitable for on-site recycling with the rest of the waste collected during the response efforts.

	Collect all debris in properly labeled waste containers (impervious bags, drums, or buckets).
	Dispose of contaminated material in accordance with all applicable solid and hazardous waste regulations using a licensed waste hauler and disposal facility, after appropriately characterizing the material for collection and disposal.
	Dispose of all contaminated response material within 2 weeks of the discharge.

2.2.5 Termination *40 CFR 112.4(a)*

The RC ensures that cleanup has been completed and that the contaminated area has been treated or mitigated according to the applicable regulations and state/federal cleanup action levels. The RC collaborates with the local, state and federal authorities regarding the assessment of damages.

Completed	Actions
	Ensure that all repairs to the defective equipment or flowline section have been completed.
	Review circumstances that led to the discharge and take all necessary precautions to prevent a recurrence.
	Evaluate the effectiveness of the response activities and make adjustments as necessary to response procedures and personnel training.
	Carry out personnel and contractor debriefings as necessary to emphasize prevention measures or to communicate changes in operations or response procedures.
	Submit any required follow-up reports to the authorities. In the case where the discharge (as defined in 40 CFR 112.1(b)) was greater than 1,000 gallons or was the second discharge (as defined in 40 CFR 112.1(b)) of 42 gallons or more within any 12-month period, the RC is responsible for submitting the required information within 60 days to the EPA Regional Administrator following the procedures outlined in Appendix B. Within 30 days of the discharge, the RC will convene an incident critique including all appropriate persons that responded to the spill. The goal of the incident critique is to discuss lessons learned, the efficacy of the Contingency Plan and its implementation, and coordination of the plan/RC and other state and local plans. Within 60 days of the critique, the Contingency Plan will be updated (as needed) to incorporate the results, findings, and suggestions developed during the critique.

2.3 Discharge Notification – *40 CFR 109.5(b)(2)*

Instructions and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local authorities are provided in Appendix B to this Plan. *Any discharge to water must be reported immediately to the National Response Center.* The Response Coordinator must ensure that details of the discharge are recorded on the Discharge Notification Form provided in Appendix B.

If the discharge qualifies under 40 CFR part 112 (see Appendix B for conditions), the RC is responsible for ensuring that all pertinent information is provided to the EPA Regional Administrator.

PART III
Response Resources and Preparedness Activities

3.1 Equipment, Supplies, Services, and Manpower - *40 CFR 109.5(c)(1) & (c)(2)*

5 - spill kits are provided to and by Miller Bros. personnel. Each response kit shall, at a minimum, contain the following equipment and material.

Quantity	Item
1	55 gallon drum
2	Granular Absorbent 20lb bag
5	10' Ultra Absorbent Boom Sock
50	Universal Mat Pads
7	Universal Absorbent Pillow
1	Safety Goggles
1	Nitrile Gloves (Box)
1	Trash Bags (Box)
2	Shovel
2	Broom

This material is sufficient to respond to most minor discharges occurring at the facility and to initially contain a major discharge while waiting for additional material or support from outside contractors. The inventory is verified on a weekly basis during the inspection by designated personnel and is replenished as needed.

40 CFR 109.5(d)(2)
SRC and Miller Bros. have employees trained and available to respond to an oil discharge. Miller Bros. personnel may be assisted by SRC employees if required and available. All employees are familiar with the facility layout,location of spill response equipment and staging areas, and response strategies, and with the SPCC and Oil Spill Contingency Plans for this facility. All have received trainingin the deployment of response material.

40 CFR 109.5(c)(3)

To respond to larger discharges and ensure the removal and disposal of cleanup debris, SRC has established agreements with a specialized cleanup contractor: Clean Harbors of Bristol, CT. Contact information is provided in Appendix A. These contractors have immediate access to an assortment of equipment and materials, including mechanical recovery equipment for use on water and on land, small boats, floating booms, and large waste containers. Each contractor has sufficient response equipment to contain and recover the maximum possible discharge of 6,835 gallons. Clean Harbors can respond *within 8 hours* of receiving a verbal request from the RC. SRC discusses response capacity needs on a periodic basis with each contractor to ensure that sufficient equipment and material are available to respond to a potential 6,835-gallon discharge.

3.2 Access to Receiving Waterbody - *40 CFR 109.5(d)(5)*

Unnamed Creek would be the first waterbody affected in the event of a discharge. From there, the oil would flow into the Gulf Stream, and finally into the Naugatuck River. The response strategy consists of: (1) deploying booms and other response equipment at various points downstream from the oil plume to prevent its migration; and (2) deploying booms as a protective measure for an irrigation water intake and other downstream sensitive receptors.

Vehicular access to the unnamed creek is essential to ensure that the response equipment can be effectively deployed to contain oil at various points along the waterway and prevent further migration of the oil towards the Naugatuck River.

Two access points have been established along unnamed creeks and are marked on the map in Figure C-1 (BC1 and BC2). These access points provide sufficient cleared land for a staging area from which SRC, or contractor personnel can deploy response equipment, and recover and store spilled oil.

Once per month, as part of the monthly inspection of the facility, SRC facility personnel visually observe the location and make sure that it remains accessible (e.g., vegetation is not overgrown).

3.3 Communications and Control - *40 CFR 109.5(b)(3) & 40 CFR 109.5(d)(3)*

A central coordination center will be set up at the field office in the event of a discharge. The field office is equipped with a variety of fixed and mobile communication equipment (telephone, fax, cell phones, two-way radios, computers) to ensure continuous communication with SRC management, responders, authorities, and other interested parties.

Communications equipment includes:

- **Cell phones.** Each field vehicle and the RC shall have a mobile phone. The RC and/or his alternate (Site Supervisor when the Field Operations Manager is not “on call”) can be reached by cell phone 7 days a week, 24 hours a day.

The RC is responsible for communicating the status of the response operations and for sharing relevant information with involved parties. The Director EHS&S or his designee including local, state, and federal authorities.

In the event that local response agencies, Connecticut authorities, or a federal On-Site Coordinator (OSC) assumes Incident Command, the RC will function as the facility representative in the Unified Command structure.

3.4 Training Exercises and Updating Procedures - *40 CFR 109.5(d)(1)*

SRC and its subcontractors, and Miller Bros has established and maintains an ongoing training program to ensure that personnel responding to oil discharges are properly trained and that all necessary equipment is available to them. The program includes on-the-job training on the proper deployment of response equipment and periodic practice drills during which personnel are asked to deploy equipment and material in response to a simulated discharge. The RC is responsible for implementing and evaluating preparedness training.

Following a response to an oil discharge, the RC will evaluate the actions taken and identify procedural areas where improvements are needed. The RC will conduct a briefing with field personnel, contractors, and local emergency responders to discuss lessons learned and will integrate the outcome of the discussion in subsequent SPCC briefings and employee training seminars. As necessary, the RC will amend this Contingency Plan or the SPCC Plan to reflect changes made to the facility equipment and procedures.

APPENDIX A
EMERGENCY CONTACTS

40 CFR 109.5(b)(2)

Name	Title	Telephone
TBD	Field Operations Silicon Ranch Corporation	
Dee Kohler	Project Manager Silicon Ranch Corporation	(512) 924-3595 (cell)
Jim Barfield	Director EHS&S Silicon Ranch Corporation	(704)-985-3316 (cell)
Pete LaCamera	Field Supervisor Miller Bros.	(610) 246-1267 (cell)

Local Emergency Responders

Name	Telephone	Address
Fire/Police Departments	911	
Connecticut State Police	(860) 535-1451	

Cleanup Contractors

Name	Telephone	Address
Clean Harbors	(860) 583-8917	

APPENDIX B
DISCHARGE NOTIFICATION PROCEDURES

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Field Operations Manager, TBD (24 hours) TBD

Local Emergency (fire, explosion, or other hazards) 911

Agency / Organization	Agency Contact	Circumstances	When to Notify
Federal Agencies			
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	**Immediately (verbal)**
CT Division of Emergency Management and Homeland Security – Region 5	1-860-922-3727	Discharge reaching navigable waters.	**Immediately (verbal)**
Connecticut Department of Energy and Environmental Protection	1-866-337-7745	Discharge 1,000 gallons or more into navigable waters; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 2.1 of this Plan)

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the owner/operator
- Date and time of the incident
- Location of the incident
- Source and cause of discharge
- Types of material(s) discharged
- Total quantity of materials discharged
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines)
- Danger or threat posed by the release or discharge
- Description of all affected media (e.g., water, soil)
- Number and types of injuries (if any) and damaged caused
- Weather conditions
- Actions used to stop, remove, and mitigate effects of the discharge
- Whether an evacuation is needed
- Name of individuals and/or organizations contacted
- Any other information that may help emergency personnel respond to the incident

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility
- Name of the owner or operator
- Location of the facility
- Maximum storage or handling capacity and normal daily throughput
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements
- Description of facility, including maps, flow diagrams, and topographical maps
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred.
- Additional preventive measures taken or contemplated to minimize possibility of recurrence
- Other pertinent information requested by the Regional Administrator.

Discharge Notification Form

****** Notification must not be delayed if information or individuals are not available. Additional pages may be attached to supplement information contained in the form.***

Facility: Litchfield Solar Facility
298 Rossi Road
Torrington, CT 06790

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name:	Tel. #:
Location of discharge	Latitude: Longitude:	Description:
Equipment source	☐ Fuel Storage Tank ☐ Pad Mounted Transformer ☐ Mobile and Heavy Equip.	Description: Equipment ID:
Product	☐ Diesel ☐ Gasoline ☐ Mineral Oil ☐ FR3 Oil	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity	Released:	Recovered:
Receiving medium	☐ water** ☐ land ☐ other (describe):	☐ Release confined to company property. ☐ Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		

Safety issues	☐ Injuries ☐ Fatalities ☐ Evacuation

Notifications		
Agency	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency Response Commission		
Cleanup contractor		

Appendix C

Site Plan and Facility Diagram

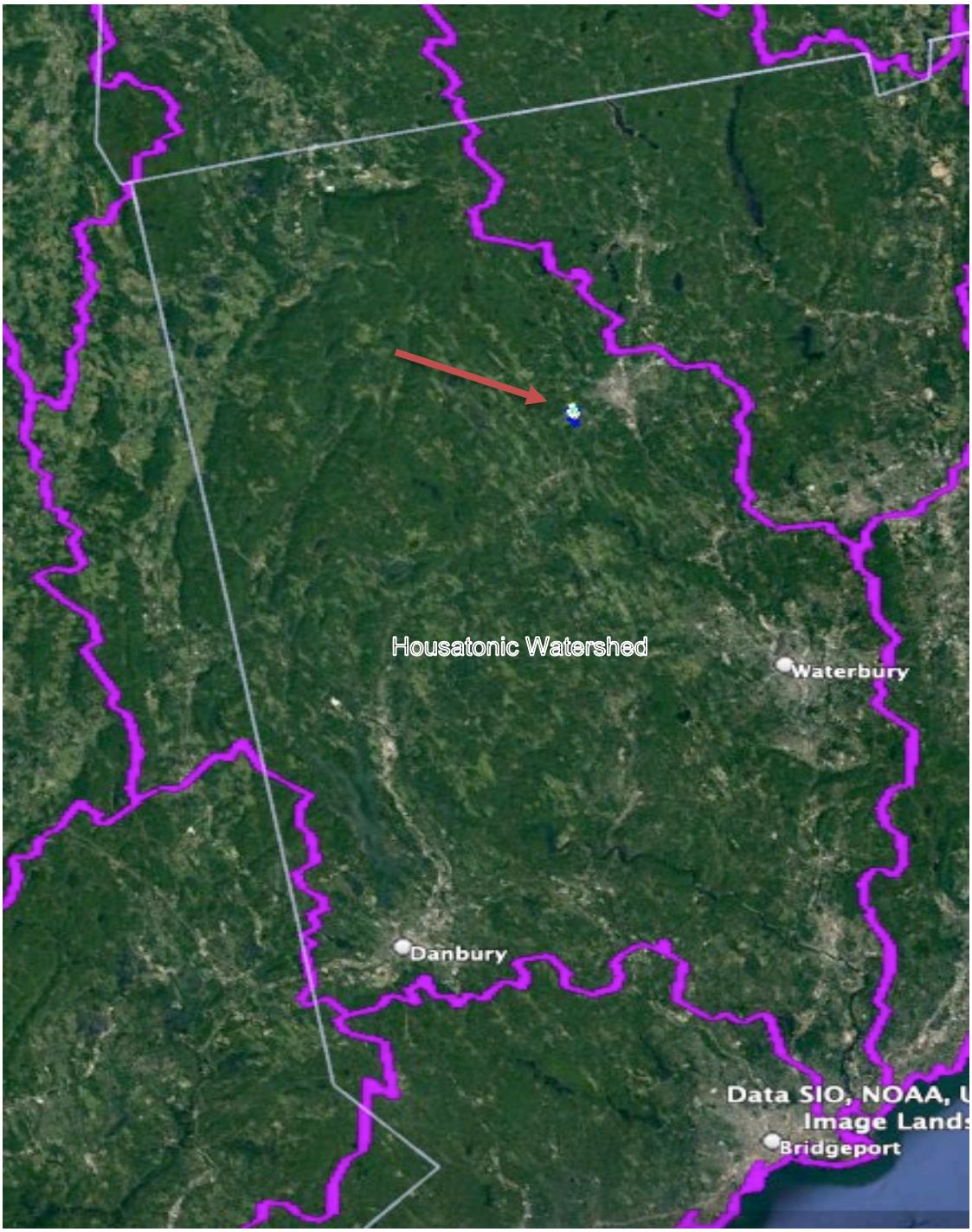

Figure C-1: Site location within the watershed

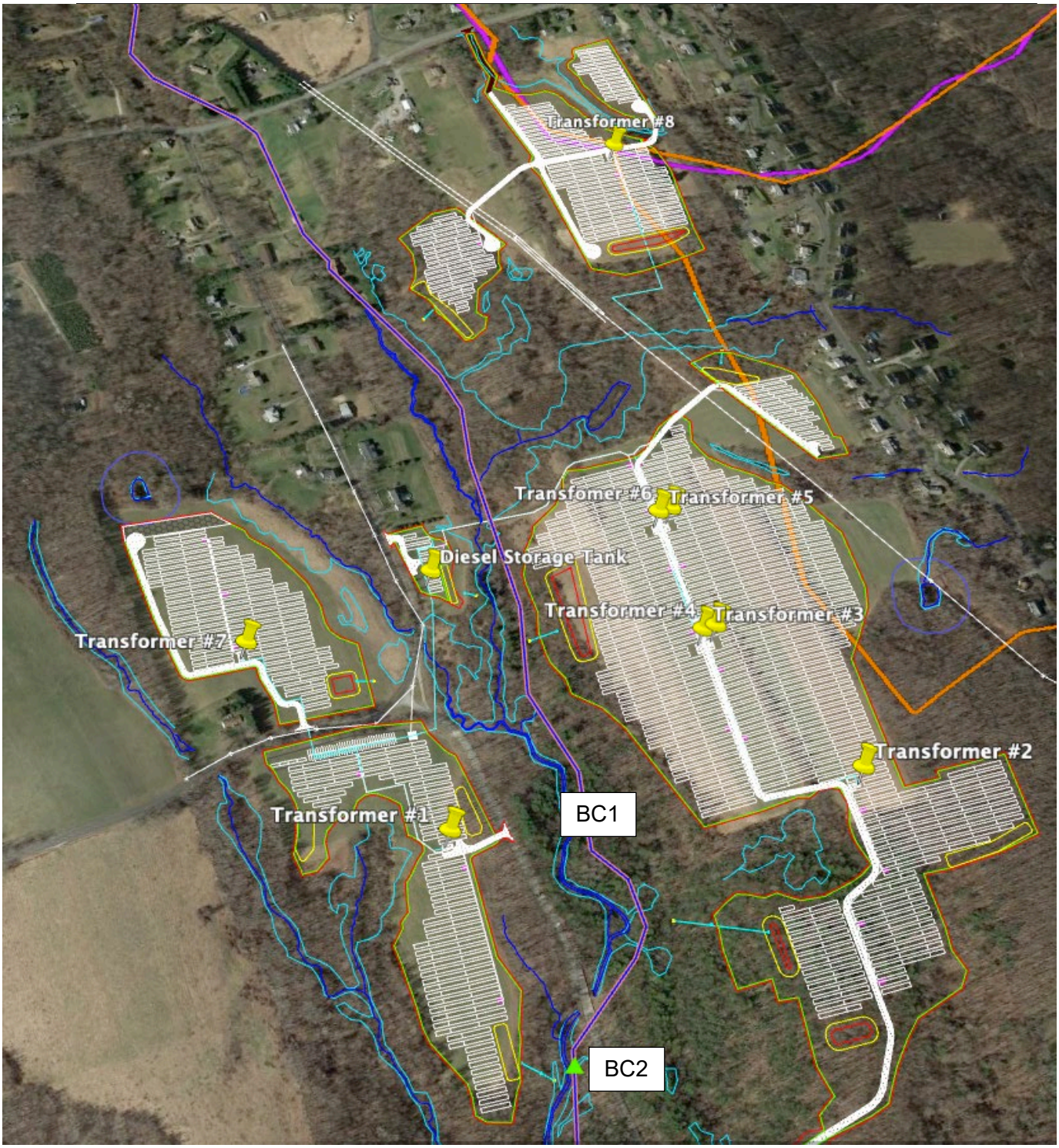

Figure C-2: Site plan

Staging area	Location	Contact Information
BC1	On property	
BC2	On property	