

SECTION IV

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)



A **tyco** International Ltd. Company

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES (SPCC) PLAN FOR WEST HAWAI`I SANITARY LANDFILL WAIKOLOA, HAWAI`I

Prepared for:

Waste Management of Hawaii
West Hawai`i Sanitary Landfill
71-1111 Queen Kaahumanu Highway
Waikoloa, Hawai`i 96738

Prepared by:

Earth Tech, Inc.
841 Bishop St., Suite 500
Honolulu, Hawai`i 96813

April 22, 2008

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ACRONYMS AND ABBREVIATIONS

AST	Aboveground storage tank
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency, United States
WHSL	West Hawai'i Sanitary Landfill
MSW	Municipal solid waste
SPCC	Spill Prevention, Control, and Countermeasures
U.S.	United States
WMH	Waste Management of Hawaii
WMI	Waste Management, Inc.

FACILITY DESCRIPTION

FACILITY NAME AND ADDRESS:	West Hawai'i Sanitary Landfill 71-1111 Queen Kaahumanu Highway Waikoloa, Hawai'i 96738
TYPE OF FACILITY:	Municipal Solid Waste Landfill
OWNER AND ADDRESS:	County of Hawai'i Dept. of Solid Waste & Environmental Management 25 Aupuni St. Hilo, HI 96720 Phone: (808) 961-8083
FACILITY OPERATOR:	Waste Management of Hawaii, Inc. (WMH) a subsidiary of Waste Management, Inc. (WMI) Phone: (808) 886-0940
FACILITY SITE MANAGER:	Mike Kaha 71-1111 Queen Kaahumanu Highway Waikoloa, Hawai'i 96738 Phone: (808) 886-0940 Mobile: (808) 960-3899
ENVIRONMENTAL PROTECTION MANAGER:	Justin Lottig 92-460 Farrington Highway Kapolei, Hawai'i 96707 Phone: (808) 668-2985 ext 16
STATIONARY OIL STORAGE:	Above Ground Storage Tank #1 - Diesel Fuel - 1,000 gallons Above Ground Storage Tank #2 - Diesel Fuel - 2,000 gallons Above Ground Storage Tank #3 - Diesel Fuel - 2,000 gallons Above Ground Storage Tank #4 - Diesel Fuel - 2,000 gallons Above Ground Storage Tank #5 - Waste Oil - 350 gallons Above Ground Storage Tank #6 - Engine Oil - 300 gallons Above Ground Storage Tank #7 - Hydraulic Oil - 300 gallons Various oil products (waste oil, lube oil, and rock drill oil) are stored in 55-gallon drums.
MOBILE OIL STORAGE:	Mobile Storage Tank #8 - Diesel Fuel - 400 gallons Mobile Storage Tank #9 - Diesel Fuel - 250 gallons Mobile Storage Tank #10 - Diesel Fuel - 250 gallons Mobile Storage Tank #11 - Engine Oil - 500 gallons Mobile Storage Tank #12 - Diesel Fuel - 500 gallons
TOTAL OIL STORAGE:	9,850 gallons Fuel transfer at WHSL is conducted via vender-owned or common carrier tank truck.

This plan is available for on-site inspection during normal working hours. Please contact the operator as listed above.

SPCC PLAN OWNER'S APPROVAL

In accordance with 40 CFR 112.7

Name of Facility: West Hawai'i Sanitary Landfill
Waste Management of Hawaii

Waste Management of Hawaii (WMH) is committed to the prevention of discharges of oil and oil products to navigable waters and the environment, and maintains the highest standards for spill prevention, control, and countermeasures (SPCC) through regular review, updating, and implementation of this SPCC Plan for the West Hawai'i Sanitary Landfill (WHSL). Full approval and implementation of the SPCC Plan, as herein described, is extended by WMH management, at a level with authority to commit the necessary resources.

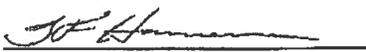
Signature: 
 Name: Mike Kaha
 Title: Site Manager
 Approved on: 4/20/2008

ENGINEER'S CERTIFICATION (112.3.d)

I have reviewed the SPCC plan prepared by Earth Tech, Inc. for the WHSL, located in Waikoloa, Hawai'i, (which was visited by a representative of Earth Tech, Inc.) and being familiar with the SPCC provisions of the Code of Federal Regulations (CFR) Title 40, Part 112; attest that this plan has been prepared in accordance with good engineering practices, that procedures for required inspections and testing have been established, and that this SPCC plan is adequate for the WHSL.

STAMP:



Signature: 
 Name: Thomas F. Hanneman, P.E.
 Registration: #10013 C Hawaii
 Date: January 30, 2003

SPCC PLAN REVIEW

In accordance with 40 CFR 112.5(b)

Name of Facility: West Hawai'i Sanitary Landfill
Waste Management of Hawaii

A review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, WMH will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology has been field-proven at the time of the review, and (2) if such technology will significantly reduce the likelihood of a discharge from the facility. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil and oil products into or upon the navigable waters of the United States or adjoining shorelines.

As such, WMH management has completed a full review of the SPCC Plan, as herein described. The following results of the review are noted (check one):

- Major changes to the facility have occurred since the last review, the SPCC Plan must be updated and re-certified by a registered Professional Engineer.
- No amendment to the SPCC Plan is necessary as per 40 CFR, Part 112.5(b).

Reviewed On: January 29, 2008, Amendment # _____

Signature: 

Reviewer's Name: Thomas F. Hanneman

Reviewer's Title: Senior Environmental Engineer

The next review date will be: January 29, 2013, (Five years from above date)

(Copies of this page should be made for subsequent reviews, and all completed forms must be signed and maintained with the SPCC Plan. If the plan is amended based on the above review, a copy of the previous page should be made and an Engineer Certification of the amendment must be signed and maintained with the amended SPCC Plan.).

1.0 PHYSICAL LAYOUT OF FACILITY (112.7.a.3)

The following Spill Prevention Control and Countermeasures (SPCC) Plan has been prepared pursuant to Title 40 CFR Part 112.

General Description

The West Hawai'i Sanitary Landfill (WHSL) is located in Waikoloa, in the North Kona area of the Island of Hawai'i. The facility is located between the Queen Kaahumanu and Mamalahoa Belt Highways, approximately 6,600 feet inland from Pueo and Keawaiki Bays.

The WHSL is an active municipal solid waste (MSW) landfill, permitted by the State of Hawai'i Department of Health (DOH) for the disposal of all non-hazardous solid waste. The WHSL is owned by the County of Hawai'i, Department of Solid Waste & Environmental Management and operated by Waste Management of Hawaii, Inc. (WMH). The WHSL property covers approximately 300 acres. The permitted waste footprint, which covers approximately 150 acres, is basically square and is divided into a series of smaller waste disposal cells. Waste disposal began in the northern portion of the permitted waste footprint (Cell 1) and has extended eastward. The landfill office, scale house, and maintenance shop are located near the northwest corner of the property.

The WHSL stores and uses petroleum products including diesel fuel, lubricating oils, and waste oil.

A Site Location Map is provided as Figure 1 and a detailed Site Layout Map is included as Figure 2. A Certification of Substantial Harm Determination for the facility is included as Appendix A.

Past Spill Events

According to facility records, the following spills occurred at the facility within the past five years:

DATE/ TIME OF SPILL	SPILL DESCRIPTION	VOLUME OF MATERIAL SPILLED	CORRECTIVE ACTION TAKEN	AGENCIES NOTIFIED?	NAVIGABLE WATERS AFFECTED?
5/17/04 11:00 AM	Plumbing malfunctions - Incomplete drain/ pipe connections to oil/water separator caused backfill to accumulate in underground pipes. Backfill subsequently caused drains to flood and sediment drained directly to soil.	Approx. 10 Gallons (site personnel estimated 4 cubic yards of soil removed)	Floor drain connections to the oil/water separator were apparently not completed at the time of original site construction. County of Hawai'i built the connections in late May 2004. WMH excavated contaminated soil in area of incomplete drain connections, and repaired the connections.	DOH (5/17/04)	No navigable waters affected.
3/01/06 7:45 AM	WM employee left a running diesel pump unattended (during fueling of a truck) and approximately 70 gallons of diesel fuel spilled.	Approx. 70 gallons	Operator was re-trained on proper operation and maintenance of equipment to prevent spills.	DOH (3/01/06)	No navigable waters affected.

1.1 DESCRIPTION OF PHYSICAL LAYOUT AND TYPE OF OIL IN EACH CONTAINER (112.7.A.3.I)

The WHSL facilities include an office building, a maintenance/equipment fueling area, water tank/pumping area, and a MSW landfill. Several distinct features of the facility will be addressed with respect to fuel and/or oil and oil products use throughout this plan. They are as follows:

- Maintenance shop/equipment fueling area
- Water tank/pumping area
- Aboveground storage tanks (ASTs)
- Other containers (55-gal drums, etc.)

Table 1 provides a listing of the fuels, oil and oil products, and lubricants stored in ASTs at the site.

A 1,000-gallon diesel AST (Tank #1), is located in the northeastern corner of the facility, within the water tank/pumping area. Three 2,000-gallon diesel ASTs (Tanks #2, #3, and #4) are located in the yard of the maintenance shop/equipment fueling area. Tanks #1, #2, #3, and #4 are double-walled and situated on concrete pads. Spill containment buckets and materials to properly absorb spills are located near the ASTs. A berm made of crushed lava rock material¹ surrounds the three ASTs in the equipment fueling area to slow down/absorb potential releases/spills. A 350-gallon waste oil AST (Tank #5), a 300-gallon engine oil AST (Tank #6), and a 300-gallon hydraulic oil AST (Tank #7) are located in a covered concrete lined and curbed containment structure adjacent to the maintenance shop. A 400-gallon mobile diesel tank (Tank #8), two-250-gallon mobile diesel tanks (Tanks #9 and #10), and a 250-gallon mobile engine oil tank (Tank #11) are located in the contractor laydown area overlying MSW Cell 4. The contractor laydown area is located within the limits of the lined landfill at the WHSL; the landfill liner system would provide secondary containment for the single-wall ASTs (#8, #9, #10 and #11) in the event of a leak or spill. Additionally, the County of Hawai'i stores a 500 gallon truck-mounted diesel fuel tank (Tank #12) within the limits of the of the landfill liner system.

The maximum potential quantity of liquid that could reasonably be released in a single incident is:

- 2,000 gallons (maximum AST capacity).

Table 1: Petroleum Products – Aboveground Storage Tanks/Mobile Tanks

Tank ID	Tank Size (gal)	Tank Type	Contents	Transfer Mechanism	Secondary Containment	Overfill/Spill Protection
Water Tank Pumping Area						
Tank #1	1,000	Fiberglass Double-Wall Horizontal	Diesel	Fuel Pump	Concrete vault	Visual Inspections, auto shut-off valve
Maintenance Shop/Equipment Fueling Area						
Tank #2	2,000	Fiberglass Double-Wall Horizontal	Diesel	Fuel Pump	Concrete vault	Visual Inspections, auto shut-off valve
Tank #3	2,000	Fiberglass Double-Wall Horizontal	Diesel	Fuel Pump	Concrete vault	Visual Inspections, auto shut-off valve

¹ The berm is made of crushed lava rock that has the consistency of sandy gravel. Because of the nature of the material, the berm is liquid permeable, and it functions as a barrier to slow down/absorb releases.

Tank ID	Tank Size (gal)	Tank Type	Contents	Transfer Mechanism	Secondary Containment	Overfill/Spill Protection
Tank #4	2,000	Fiberglass Double-Wall Horizontal	Diesel	Fuel Pump	Concrete vault	Visual Inspections, auto shut-off valve
Tank #5	350	Steel Double-Wall Horizontal	Waste Oil	Air Pump	Dual-Wall	Visual Inspections
Tank #6	300	Steel Double-Wall Horizontal	Engine Oil	Air Pump	Dual-Wall	Visual Inspections
Tank #7	300	Steel Double-Wall Horizontal	Hydraulic Oil	Air Pump	Dual-Wall	Visual Inspections
Contractor Laydown Area						
Mobile Tank #8	400	Steel Single-Wall Horizontal	Diesel	Fuel Pump	Landfill Liner System	Visual Inspections
Mobile Tank #9	250	Steel Single-Wall Horizontal	Diesel	Fuel Pump	Landfill Liner System	Visual Inspections
Mobile Tank #10	250	Steel Single-Wall Horizontal	Diesel	Fuel Pump	Landfill Liner System	Visual Inspections
Mobile Tank #11	250	Steel Single-Wall Horizontal	Engine Oil	Air Pump	Landfill Liner System	Visual Inspections
County Mobile Fuel Truck						
Mobile Tank #12	500	Steel Single-Wall Horizontal	Diesel	Fuel Pump	Landfill Liner System	Visual Inspections

In addition, small containers (55-gal drums) are used to store lubricating oils and oil products at the facility. Typically, the drums are located inside the concrete lined and curbed containment structure in the maintenance shop. Drums may also be located elsewhere on site and would be positioned on spill control pallets or other devices that would provide secondary containment.

1.2 DISCHARGE PREVENTION MEASURES (112.7.A.3.II)

Transfer discharge prevention procedures are used to prevent overfills during the routine handling of fuel/oil and oil products such as loading, unloading, or transferring. Prior to transferring fuel, it is determined if adequate storage is available to receive the entire contents of the compartment on the delivery vehicle; ports are also available for manual gauging. If the facility's storage tank cannot receive the entire contents, the surplus portion of the shipment will not be transferred.

1.3 DISCHARGE OR DRAINAGE CONTROLS (112.7.A.3.III)

Secondary containment is provided for the ASTs at the site.

1.4 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP (112.7.A.3.IV)

Sorbent materials and hand tools are stored at the facility. Spill cleanup materials are kept accessible at the facility at all times. In addition, the AST is located in close proximity to soil stockpiles that can be utilized to help absorb and clean up a potential spill.

1.5 METHODS OF DISPOSAL OF RECOVERED MATERIALS (112.7.A.3.V)

Typically, site resources will be capable and responsible for managing the cleanup of recovered materials. Additional resources within WMH or an outside cleanup contractor may also assist in the proper disposal of recovered materials. These third party resources are identified in the following section.

1.6 CONTACT LIST AND PHONE NUMBERS (112.7.A.3.VI)

Appendix B provides a complete list of contacts in the event of a spill.

2.0 RESPONSE PLAN PROCEDURES (112.7.a.4)

In response to *any* spill, local facility personnel must immediately notify the WHSL Site Manager. The National Response Center Oil Spill Report Form provided in Appendix B shall be completed and submitted to the WMH Site Manager following notification. The information to be gathered and reported includes, as required by 40 CFR 112.7.a.4:

- Date and time of the discharge;
- The type of material discharged;
- Estimate of the total material discharged;
- Source of the discharge;
- Description of affected media;
- Cause of the discharge;
- Damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Identity of the personnel currently at the site of the spill;
- Other unique or unusual circumstances;
- Whether an evacuation may be required;
- Names of individuals and/or organizations who have been contacted or will be notified.

In the event of a spill, the following emergency response contractor may be contacted:

Emergency Response Contractor:

**Pacific Commercial Services, LLC
(808) 545-4599**

Spills of oil and oil products into or upon the navigable waters (including wetlands and municipal storm water systems) of the United States or adjoining shorelines in harmful quantities, as defined in 40 CFR Part 110, must be reported (by WMH or WMI Headquarters) to the following agencies:

- U.S. Coast Guard, Washington, D.C.
National Response Center
(24-Hour #) (800) 424-8802
(24-Hour #) (202) 267-2675
- State Department of Health
Emergency Response Unit
(7:30 am to 4:30 pm)
(808) 586-4249 or (808) 247-2191

3.0 OIL SPILL EMERGENCY PLAN (112.7.a.5)

A general spill response flowchart is provided in Appendix B.

3.1 MINOR SPILL

A release is considered a minor release if it extends outside the secondary containment provisions and the spill is limited to the immediate area with no potential to enter the existing drainage facilities or present an immediate fire hazard or exposure danger.

In the event of a minor release of petroleum products, a WMH employee will:

1. Secure the area to protect all personnel and the public from any immediate danger.
2. Stop the flow at the source *only if it is safe to do so* (e.g., shut off power and close all necessary valves).
3. Attempt to contain the spill with soil and/or equipment from the appropriate spill kit (i.e., absorbent pads, drip pans, shovel, and hand tools, etc.) *only if it is safe to do so*. Used absorbent pads will be collected in a drum for proper disposal.
4. Contact the Site Manager and Environmental Protection Manager and advise him/her of the situation and status.
5. Notify appropriate agencies (NSRC, State of Hawai'i DOH, and EPA) of the spill as required, if the spill event is determined as a reportable spill.

A spill is considered a reportable spill under any of the following conditions: (1) Any amount of oil or oil products which, when released into the environment, causes a sheen to appear on surface water, or any navigable waters of the State; (2) Discharge of more than 25 gallons of oil or oil products in a single spill event; (3) Any amount of oil or oil products that is less than 25 gallons, but which is not contained and remediated within 72 hours; and (4) Discharge of oil or oil products in harmful quantities, as defined in 40CFR Part 110, into navigable waters for two reportable spill events within any 12-month period.

3.2 MAJOR SPILL

WMH personnel are not trained as first responders in the event of a major release. A release is considered a major release if it extends outside the secondary containment provisions and the spill has traveled beyond the immediate area or if the spill has entered the existing drainage facilities.

In the event of a major release of petroleum products, a WMH employee will:

1. Secure the area to protect all personnel and public from any immediate danger.
2. Stop the flow at the source *only if it is safe to do so* (e.g., shut off power and close all necessary valves).
3. Call 911 to alert the fire department and/or other emergency services.
4. Contact the WMH Site Manager and Environmental Protection Manager and advise him/her of the situation and status.
5. Call the clean-up contractor for major spills:
Pacific Commercial Services, LLC
(808) 545-4599

6. Contact all parties listed on the Oil Spill Emergency Plan Notification Check-Off List (Appendix B).

In the event that a spill occurs during a fuel transfer operation, the initial response will be by the trucking contract personnel. The WMH Site Manager must be contacted and advised of the situation. The Emergency Response Contractor (Pacific Commercial Services, LLC 808-545-4599) will be contacted if directed by the WMH Site Manager. The Emergency Response Contractor will respond as appropriate.

3.3 CONTAINMENT AND REMOVAL

The following equipment, materials, and supplies are available at the landfill to expeditiously control, contain, and remove spilled material.

- *Sorbent.* Used to absorb small surface spills (25 gallons or less). If the available absorbent cannot contain the entire spill, consider using site soil and contact the Emergency Response Contractor for help in cleaning up the spill.
- *Equipment.* Hand tools, shovels, and site equipment are available to collect spilled product and sorbent materials.

4.0 PREDICTION OF THE NATURE OF POTENTIAL SPILLAGE (112.7.b)

Table 2 describes the consequences of potential failures of the ASTs at the facility. The fuel delivery tanks mounted on the service tank trucks are not owned and/or operated by WHSL, and are not addressed in this SPCC Plan.

Table 2: Prediction of Potential Spillage

Potential Event	Spill Description	Maximum Volume	Spill Rate
Leak in Tank #1, Diesel Fuel	Diesel would spill into secondary containment	Ounces to gallons	Minutes to hours
Rupture in Tank #1, Diesel Fuel	Diesel would spill into secondary containment	1,000 gallons	Instantaneous
Breach in containment system for Tank #1, Diesel Fuel	Diesel would infiltrate into underlying soils ²	1,000 gallons	Instantaneous to hours
Leak in Tank #2 (or Tank #3, Tank #4)	Diesel would spill into secondary containment	Ounces to gallons	Minutes to hours
Rupture in Tank #2 (or Tank #3, Tank #4), Diesel Fuel	Diesel would spill into secondary containment	2,000 gallons	Instantaneous
Breach in containment system for Tank #2 (or Tank #3, Tank #4), Diesel Fuel	Diesel would infiltrate into underlying soils	2,000 gallons	Instantaneous to hours
Leak in Tank #5, Waste Oil	Waste oil would spill into secondary containment	Ounces to gallons	Minutes to hours
Rupture in Tank #5, Waste Oil	Waste oil would spill into secondary containment	350 gallons	Instantaneous
Breach in containment system for Tank #5, Waste Oil	Waste oil would be contained by the lined and curbed concrete containment structure and would be cleaned up before it reaches capacity	350 gallons	Instantaneous to hours
Leak in Tank #6, Engine Oil	Engine oil would spill into secondary containment	Ounces to gallons	Minutes to hours
Rupture in Tank #6, Engine Oil	Engine oil would spill into secondary containment	300 gallons	Instantaneous
Breach in containment system for Tank #6, Engine Oil	Engine oil would be contained by the lined and curbed concrete containment structure and would be cleaned up before it reaches capacity	300 gallons	Instantaneous to hours
Leak in Tank #7, Hydraulic Oil	Hydraulic oil would spill into secondary containment	Ounces to gallons	Minutes to hours
Rupture in Tank #7, Hydraulic Oil	Hydraulic oil would spill into secondary containment	300 gallons	Instantaneous
Breach in containment system for Tank #7, Hydraulic Oil	Hydraulic oil would be contained by the lined and curbed concrete containment structure and would be cleaned up before it reaches capacity	300 gallons	Instantaneous to hours
Leak in Mobile Tank #8 (or Mobile Tank #9, Mobile Tank #10), Diesel Fuel	Diesel Fuel would infiltrate into underlying soils and be contained by MSW liner system.	Ounces to gallons	Minutes to hours
Rupture in Mobile Tank #8 (or Mobile Tank #9, Mobile Tank #10), Diesel Fuel	Diesel Fuel would infiltrate into underlying soils and be contained by MSW liner system.	400 gallons	Instantaneous
Leak in Mobile Tank #11, Engine Oil	Engine Oil would infiltrate into underlying soils and be contained by MSW liner system.	Ounces to gallons	Minutes to hours
Rupture in Mobile Tank #11, Engine Oil	Engine Oil would infiltrate into underlying soils and be contained by MSW liner system.	250 gallons	Instantaneous
Leak in Mobile Tank #12, Diesel Fuel	Diesel Fuel would infiltrate into underlying soils and be contained by MSW liner system.	Ounces to gallons	Minutes to hours
Rupture in Mobile Tank #12, Diesel Fuel	Diesel Fuel would infiltrate into underlying soils and be contained by MSW liner system.	500 gallons	Instantaneous

² Most of the soil at the site is crushed lava rock (gravel), which has relatively high permeability, therefore the diesel would likely infiltrate into the soil.

5.0 DIVERSIONARY STRUCTURES OR EQUIPMENT WHICH PREVENT SPILLS FROM REACHING NAVIGABLE WATERS (112.7.c)

5.1 DIKES, BERMS, OR RETAINING WALLS SUFFICIENTLY IMPERVIOUS TO CONTAIN SPILLED OIL (112.7.c.1.i)

Secondary containment for the ASTs (#1, #2, #3, and #4) is provided by the dual-wall design of these tanks. In addition, the ASTs in the fueling area are bounded by an earthen berm consisting of crushed lava rock (gravel), which would restrict surface migration of oil potentially released from these tanks. The 55-gallon drums are placed on secondary containment spill control pallets inside a container at the maintenance shop.

The site is a permitted MSW landfill with liner systems for all landfill cells, as required by State of Hawai'i regulations for solid waste landfills (Hawai'i Administrative Rules 11.58.1). The landfill liner system typically consists of a geosynthetic clay liner overlain by a 60-mil high-density polyethylene geomembrane. In the event of a spill, the landfill liner system would provide secondary containment for the single-wall mobile tanks (#8, #9, #10, #11, and #12). Therefore, the landfill liner system would prevent spills that occur within the permitted landfill area from reaching navigable waters.

5.2 CURBING (112.7.c.1.ii)

A tertiary containment system consisting of concrete curbing built around the perimeter of the waste oil/engine oil/hydraulic oil ASTs #5, #6, and #7 (maximum capacity 350 gallons) can contain 860 gallons. The waste disposal cells at the WHSL are composite-lined with a geosynthetic clay liner overlain by a 60-mil, high-density polyethylene geomembrane, and are equipped with a leachate collection and removal system. The liner and leachate collection system helps to contain liquids by preventing them from spreading into the surrounding environment.

5.3 CULVERTS, GUTTERS, OR OTHER DRAINAGE SYSTEMS (112.7.c.1.iii)

A single culvert is present at the site, which runs under the road between the maintenance shop and the administration building. No other gutters or drainage systems exist at the site.

5.4 WEIRS, BOOMS, AND OTHER BARRIERS (112.7.c.1.iv)

No weirs, booms, or other barriers are used or stored at the site.

5.5 SPILL DIVERSION PONDS (112.7.c.1.v)

There are no spill diversion ponds on-site at the WHSL.

5.6 RETENTION PONDS (112.7.c.1.vi)

There are no retention ponds on-site at the WHSL.

5.7 SORBENT MATERIALS (112.7.c.1.vii)

Sorbent materials and hand tools are stored at the site to assist in containing small spills. Spill clean-up materials are supplied and kept in the maintenance area near the ASTs at all times.

6.0 INSPECTIONS, TESTS, AND RECORDS (112.7.e)

According to the Settlement Agreement between the United States Environmental Protection Agency (EPA) and the American Petroleum Institute and Marathon Oil Company, visual inspections are considered adequate for well-designed, shop-built containers with a shell capacity of less than 30,000 gallons, provided the container is elevated or has a barrier between the container and the ground, so that leaks would be immediately detected. The inspector will record deficiencies (including minor oil leaks or seeps, corrosion, or damage) and corrective action will be made to correct such deficiencies. Modifications and additions to the facility deemed necessary as a result of these inspections shall be carried out as soon as practicable. Changes to the applicable sections of this plan shall also be made upon completion of any facility modifications. A written inspection checklist shall be completed monthly and maintained at the facility. All walls, including the top and bottom of each AST must be visually inspected for signs of deterioration at least once every five (5) years. If such signs exist, the Certifying Engineer must be consulted for requirements of further action.

In accordance with state and federal regulations, SPCC inspections (visual) at the WHSL are conducted on a monthly basis by WMH Personnel and consist of: 1) inspecting exterior surfaces of tanks, pipes, valves and other equipment for leaks and maintenance deficiencies; 2) identifying cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank insulation, malfunctioning equipment and structural and foundation weaknesses; and 3) inspecting and monitoring all leak detection systems or other monitoring or warning systems (i.e., alarm system) which may be in place at the facility.

The Facility Inspection Report provided in Appendix C is the checklist that is currently used at the WHSL for SPCC inspections. If any deficiencies are noted, corrective action is implemented and followed-up until properly mitigated. Monthly inspection sheets are kept on-site, along with the following records, in the WHSL Operating Files:

- A current list of tank locations and capacities (Copy of the SPCC Plan)
- A record of all repairs to piping, containment, or the tanks
- A record of disposal of oil and oil products from spills
- All engineering changes made to the systems
- Training activities and personnel involved

The SPCC file will be maintained on-site for a minimum of 3 years.

7.0 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES (112.7.f)

7.1 OPERATION AND MAINTENANCE OF EQUIPMENT (112.7.F.1)

The Site Manager is responsible for the proper care and use of facility equipment in order to prevent spills. The Site Manager is also responsible for the containment and clean-up of small spills, and for the implementation of proper procedures described herein in the event of a major spill.

SPCC training and orientation will be given by the WHSL Site Manager to WHSL personnel involved with SPCC operations. Training will include topics such as:

- Familiarization with maintenance shop & operations
- Familiarization with various pollution abatement equipment (e.g., sorbents, berms, construction of curbs or diversionary methods)
- General review of SPCC regulations
- General review of the SPCC Plan
- Spill & leak prevention, recognition, and response techniques

Through training, facility personnel will be made aware that care and good judgment are the best means of preventing spills, and that monthly inspections are required to identify leaks or deficiencies that could result in leaks and must be repaired. Facility personnel shall be instructed to:

- Exercise care in the delivery of products
- Never leave a fuel transfer unattended
- Keep a close watch on the product levels in the storage tank
- As a general rule, do not wait for problems to occur; anticipate problems and take precautionary measures to prevent them

7.2 RESPONSIBLE FACILITY PERSON (112.7.F.2)

The Site Manager is the designated person at the WHSL facility who is responsible for spill prevention. The Site Manager is also responsible for notifying the WMH Environmental Protection Manager and appropriate WM personnel of any spills/releases that occur on-site. If necessary, the Environmental Protection Manager will notify the appropriate agencies.

7.3 DISCHARGE PREVENTION TRAINING BRIEFINGS (112.7.F.3)

The Site Manager is responsible for ensuring that all facility oil- and oil product-handling personnel are trained annually in the operation and maintenance of equipment to prevent the discharge of oil and oil products; discharge procedure protocols; applicable pollution control laws, rules and regulations; general facility operations; and the contents of the WHSL SPCC Plan (see Appendix D for an example form for the training guidelines and recording of attendees).

Periodic meetings will be held by the Site Manager to discuss any discharges, failures, malfunctioning equipment, and any recently developed precautionary measures that have been implemented at the facility.

8.0 SECURITY (112.7.g)**8.1 FENCING AND GATES (112.7.G.1)**

The West Hawai'i Sanitary Landfill has gated access along the exit road, and perimeter fencing, and other natural barriers to deter unauthorized entry. This security meets the criteria set forth by 40 CFR 112.7.g.1 to deter vandals and unwanted entry into the site. The fence limits access to the site from adjacent roadways and highways. The security gates are kept locked at night and when the facility is closed.

8.2 FLOW AND DRAIN VALVE LOCKS (112.7.G.2)

No flow or drain valve locks are used on-site.

8.3 PUMP CONTROL LOCKS (112.7.G.3)

No pump control locks are used on-site.

8.4 OUT-OF-SERVICE PIPING SECURED (112.7.G.4)

There is no out-of-service piping at the site.

8.5 FACILITY LIGHTING (112.7.G.5)

Security lights are located around the office/administration building and the maintenance area.

9.0 FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK (112.7.h)

Off-site contract delivery tanker trucks periodically fill the diesel storage tank (Tank #1). Deliveries occur approximately five times a month, consistent with the site's fuel consumption needs. Tankers that deliver fuel are typically single-cylinder tankers with 3,000-gallon capacities. Fueling of the diesel tank occurs on soils adjacent to the tank. The tanks are located in remote, low-traffic areas of the site with limited potential for contact from other site vehicles. A perimeter berm made of crushed lava rock has been placed around the three-2,000 gallon diesel ASTs to limit the extent of potential spills that occur during filling.

9.1 LOADING/UNLOADING AREA DRAINAGE CONTAINMENT SYSTEM (112.7.H.1)

Under the EPA Settlement Agreement with the American Petroleum Institute and Marathon Oil Company, this section is not applicable to the WHSL, because there is no truck loading/unloading rack on-site. The EPA notices, with respect to this settlement, have not yet been published in the Federal Register. If changes are required to this SPCC plan as a result of these notices, it will be revised within six months of publication of the notices.

9.2 PREVENTION OF VEHICLES MOVING BEFORE DISCONNECTED (112.7.H.2)

Delivery vehicle operators are licensed vendors who are trained by their employers in the use of the unloading equipment associated with his/her truck, and are responsible for proper use in accordance with US DOT regulations. Contractors are required to have the following equipment at all times:

- Secondary containment for any tank
- Adequate spill response materials at the location of the tank

The fuel vendor is present the entire time the tank is being filled. During tank loading and unloading operations, the fuel vendor is required to be out of the truck to monitor the operations. The fuel vendor/delivery vehicle operator is required to provide WMH with copies of:

- Documentation of training for a company's operators
- A copy of the vendor's SPCC Plan/Spill Response Plan (or equivalent)

9.3 INSPECTION OF VEHICLE TO PREVENT LEAKAGE IN TRANSIT (112.7.H.3)

The fuel delivery truck operator is responsible for assuring that all fittings are tightly closed in order to prevent leakage from the vehicle. Tank filling is performed at the tank fill-port by qualified vendors. A fuel vendor is dispatched to the facility based upon product inventory information obtained from the electronic monitoring system or based upon available, periodic fuel delivery. During transfer to the AST, the following procedures shall be followed to protect against overfilling the storage tank:

- Prior to filling the tank, the driver verifies fuel/oil needs based upon electronic level and manual gauge readings to confirm adequate capacity.
- The fuel vendor is present the entire time the tank is being filled. During tank loading and unloading operations, the fuel vendor is required to be out of the truck to monitor the operations and the connections of the fuel transfer lines.
- Before the fuel vendor leaves the site, he/she is required to examine the lower-most drain in addition to their outlets for any sign of leakage. When necessary, outlets must be adjusted to prevent leakage while in transit.
- The fuel delivery truck operator is required to immediately report any spills to the WHSL office.

10.0 FIELD-CONSTRUCTED AST BRITTLE FRACTURE ANALYSIS (112.7.i)

This section is not applicable as there are no field-constructed ASTs at the WHSL site.

11.0 CONFORMANCE WITH STATE REQUIREMENTS (112.7.j)

The petroleum ASTs at this facility are maintained in full compliance with federal regulations. Hawai'i State regulations are no more stringent than Federal Regulations.

12.0 SPCC PLAN REQUIREMENTS FOR ONSHORE FACILITIES (112.8)

The following is a description of systems and procedures in use at the facility, which, in addition to those outlined above, will minimize spills and provide containment and cleanup.

12.1 FACILITY DRAINAGE (112.8.B)

Drainage in the area of the 2,000-gallon fuel tanks generally percolates into the porous lava rock surface or flows in a northeasterly direction towards the low-lying area between the maintenance shop/fueling area and the administration building. A perimeter berm made of crushed lava rock has been placed around the ASTs to limit the extent of any potential spills. Drainage in the water tank/pumping area also percolates into the porous lava rock and flows towards the west. Drainage in the contractor laydown area percolates into MSW Cell 4 and is contained by the underlying landfill liner system.

12.2 BULK STORAGE CONTAINERS (112.8.c)

Three 2,000-gallon ASTs are located within the bermed portion of the maintenance shop/fueling area. One 1,000-gallon AST is located in the water tank/pumping area. Waste oil/engine oil/hydraulic oil ASTs are located in a covered concrete-lined and curbed area adjacent to the maintenance shop. Four trailer-mounted tanks (diesel fuel and engine oil) ranging in size from 250 to 400 gallons are located in the contractor laydown area. Additionally, the County of Hawai'i stores a truck-mounted 500-gallon diesel tank within the limits of the landfill liner system. The ASTs and mobile tanks are listed in Table 1. Small quantities of oil products may also be stored on-site in portable containers, such as drums or drip pans, in the maintenance/fueling area.

12.2.1 Compatibility (112.8.c.1)

The fiberglass double-wall ASTs are compatible with the stored materials. The steel ASTs, portable tanks, and the secondary containment systems at the site are compatible with all grades of gasoline, distillates, and lubricant oils. A copy of the material safety data sheet for diesel fuel is located on-site.

12.2.2 Secondary Containment (112.8.c.2)

The 1,000 and 2,000-gallon ASTs at the WHSL are double-walled tanks encased within a reinforced concrete secondary containment structure that can contain 100 percent of the tank's rated capacity and can fully support the loaded fuel tank and pumping system (Photos 1 and 2). The entire 1,000-gallon and 2,000-gallon AST areas are protected from accidental traffic collisions by red traffic posts, spaced at approximately 6-foot intervals. The steel ASTs are double-walled tanks. In addition, there is a tertiary containment system that consists of concrete curbing built around the perimeter base of the tanks; this containment system is capable of holding 860 gallons (Photo 3).

The site is a permitted MSW landfill with liner systems for all landfill cells, as required by State of Hawai'i regulations for solid waste landfills (Hawai'i Administrative Rules 11.58.1). The landfill liner system typically consists of a geosynthetic clay liner overlain by a 60-mil high-density polyethylene geomembrane. In the event of a spill, the landfill liner system would provide secondary containment for the single-wall mobile tanks (#8, #9, #10, #11, and #12).

Miscellaneous containers storing various oil and oil products are also located at the WHSL. Typically these containers are 55-gallon drums located in or around the maintenance shop/equipment fueling area. These containers are stored on spill control pallets (plastic "poly-spill" secondary containment pallets) or within the secondary containment structure. Should secondary containment be breached, oil product would spill onto the concrete surface where it would be contained and cleaned-up with sorbent materials.

12.2.3 Drainage of Rainwater (112.8.c.3)

The topography around the maintenance/equipment fueling area generally slopes to the northeast. Should the secondary containment (berm) for the maintenance shop/equipment fueling area be breached, spills/releases would drain via sheet flow to the low-lying area between the maintenance/fueling area and the administrative building. Considering the high permeability of the site soils and lava rock, it is likely that the rainwater would be absorbed into the ground surface before it could flow off-site. These containment structures are inspected and cleaned on a regular basis (SPCC monthly inspection) to prevent hazardous materials from flowing off-site.

12.2.4 Buried Metallic Tanks (Testing) (112.8.c.4)

This section is not applicable, as there are no buried tanks at the site.

12.2.5 Partially Buried Tanks (112.8.c.5)

This section is not applicable as there are no partially buried tanks at the site.

12.2.6 Aboveground Storage Tanks (112.8.c.6)

The ASTs are inspected as part of the monthly SPCC inspections in accordance with procedures identified in Section 6.0. Every ten years the tanks inspected by a qualified tank inspector (American Petroleum Institute or Steel Tank Institute certified) in accordance with Steel Tank Institute Standard SP001-00.

12.2.7 Internal Heating Coil Leakage Control (112.8.c.7)

This section is not applicable because the ASTs are not equipped with internal heating coils.

12.2.8 Fail-Safe Spill Prevention (112.8.c.8)

Established transfer procedures are used to prevent overfills from tank trucks. Before unloading product, employees are required to accomplish the following:

- Site personnel or delivery vehicle operators are present before and during transfer operations
- The level in the tank being pumped into is verified (measured)
- Transfer hoses, fittings, etc. are inspected
- Hose-to-tank connection is made
- After pumping has started, the operator verifies that the designated tank is receiving transferred product, and that no leakage is occurring

The operation is continually monitored for leaks or spills. The fuel delivery truck operator is required to immediately report any spills or releases to the WHSL office.

12.2.9 Plant Effluent Discharged into Navigable Water (112.8.c.9)

This section is not applicable as there are no regulated, routine plant discharges to navigable waters.

12.2.10 Visible Oil Leaks (112.8.c.10)

Any equipment that shows evidence of leakage will be repaired or replaced. Any oil or oil product accumulation or stained soils in the bermed area will be promptly removed and properly disposed of in accordance with good engineering practices.

12.2.11 Mobile or Portable Storage Tanks (112.8.c.11)

There is no facility-owned tanker truck at the WHSL. Fuel transfer is conducted via vender-owned or common carrier tank trucks.

12.3 FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESSES (112.8.D)**12.3.1 Buried Piping Protection (112.8.d.1)**

A buried piping system consisting of two 0.5-inch diameter galvanized steel pipes (approximately 16 feet in length) connects a 1000 gallon double walled diesel AST (Tank #1) to the auxiliary power plant. The auxiliary power plant runs the pump for the production well located in the eastern corner of the site. The piping system is inspected periodically to verify that it is in good condition and no leaks are occurring.

12.3.2 Out-of-Service Piping (112.8.d.2)

This section is not applicable as there is no out-of-service piping at the site.

12.3.3 Pipe Supports (112.8.d.3)

A single 1 foot high galvanized steel pipe support is bolted to the top of Tank # 3 and holds up a section of 1.5 inch diameter galvanized steel piping that connects the three 2,000-gallon diesel ASTs (Tanks #2, #3, and #4), located in the yard of the maintenance shop/equipment fueling area. The pipe support is inspected periodically to check for corrosion and verify that it is in good condition.

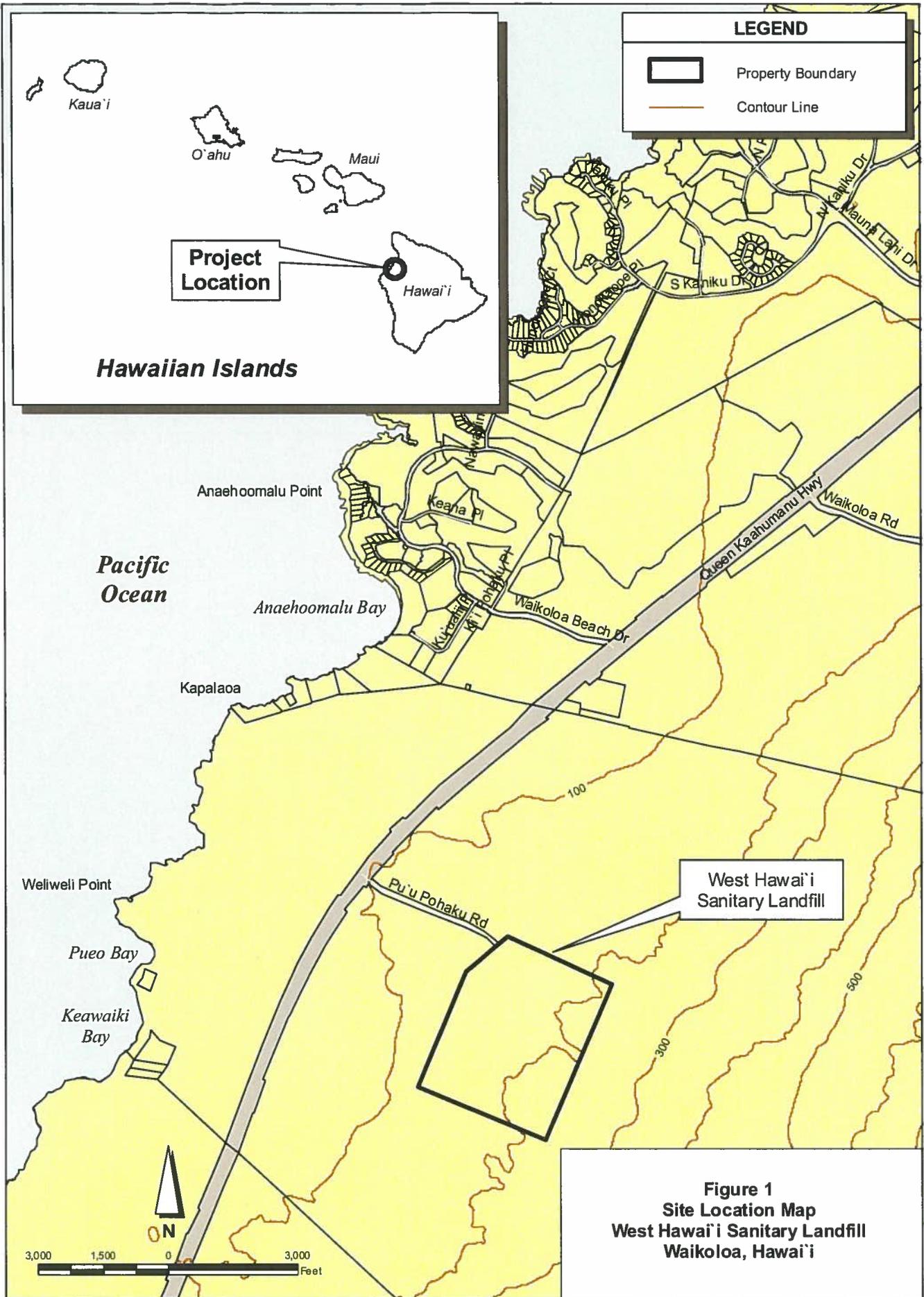
12.3.4 Inspection of Aboveground Valves, Piping, and Appurtenances (112.8.d.4)

All piping, valves, and appurtenances are inspected in accordance with the procedures described in Section 6.0.

12.3.5 Overhead Pipe Clearance (112.8.d.5)

This section is not applicable as there is no piping subject to this requirement.

FIGURES



LEGEND

- Property Boundary
- Contour Line

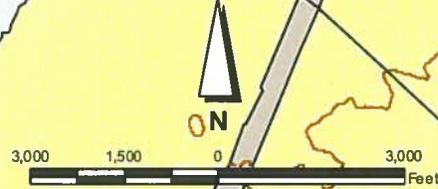
Project Location

Hawaiian Islands

West Hawai'i Sanitary Landfill

Figure 1
Site Location Map
West Hawai'i Sanitary Landfill
Waikoloa, Hawai'i

Map Document: (Q:\GIS\West_Hi_Landfill\MXD\West_Hi_Landfill.mxd)
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GRAPHIC SCALE
0 200 400
SCALE: 1"=200'

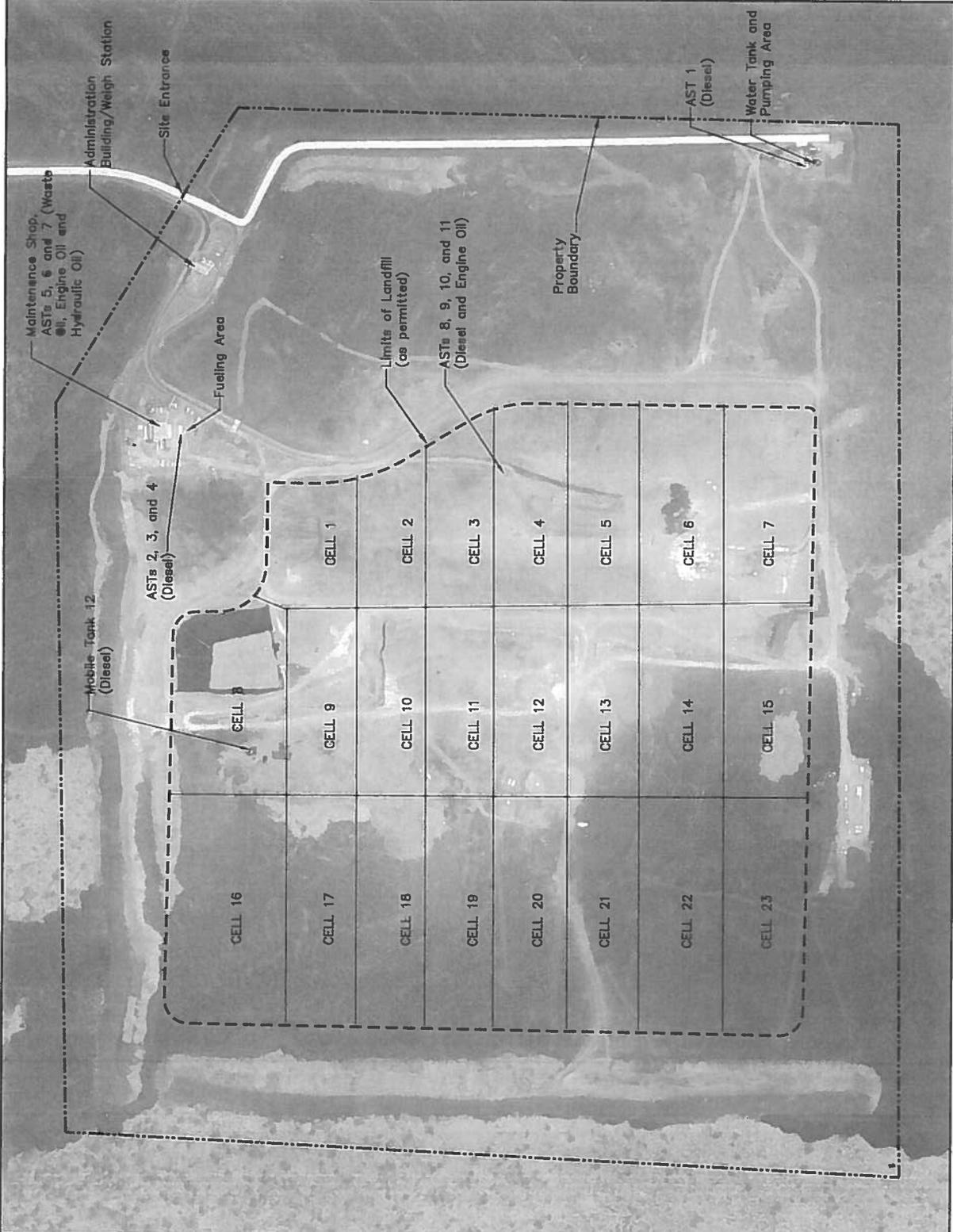


Figure 2
Site Layout Map
West Hawai'i Sanitary Landfill
Waikoloa, Hawai'i

PHOTOS



Photo 1: 1,000-gallon Diesel AST in the Water Tank/Pumping Area



Photo 2: Three 2,000-gallon Diesel ASTs in the Maintenance Yard

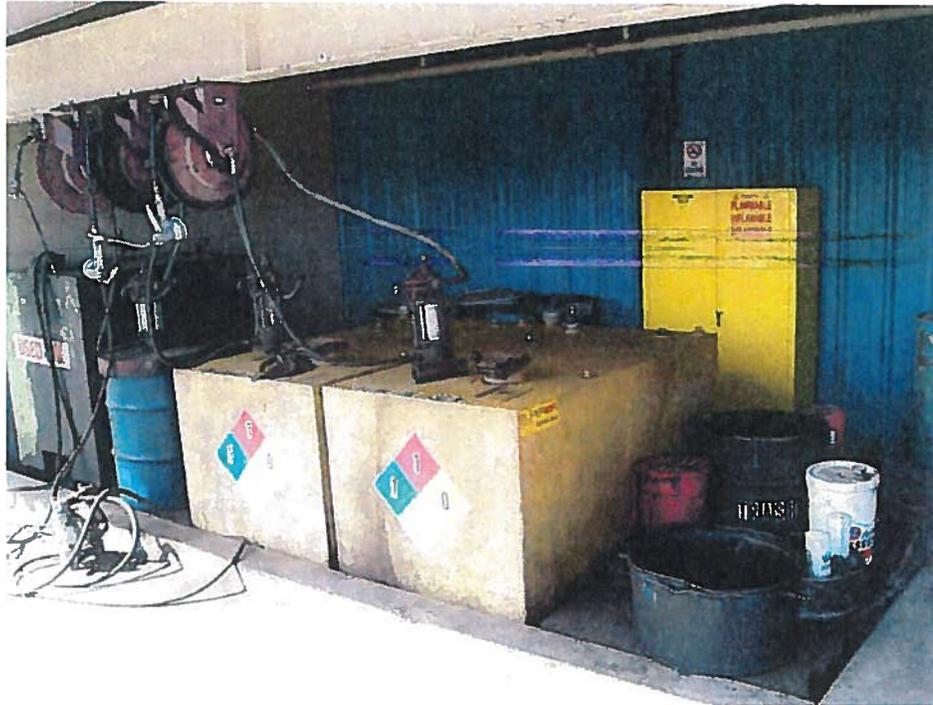


Photo 3: Waste Oil, Hydraulic Oil, and Engine Oil ASTs in the Maintenance Area



Photo 4: Spill Kit in the Maintenance Shop/Fueling Area



Photo 5: 400-gallon Mobile Diesel AST in the Contractor Laydown Area



Photo 6: Three 250-gallon ASTs (Diesel and Motor Oil) in the Contractor Laydown Area



Photo 7: 500-gallon County Mobile Diesel AST parked within MSW Cell 8

**Appendix A:
Certification of Substantial Harm Determination**

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

FACILITY NAME: West Hawai'i Sanitary Landfill
FACILITY ADDRESS: 71-1111 Queen Kaahumanu Highway
Waikoloa, Hawai'i 96738

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfers of oil to or from vessels?

YES _____ NO X _____
2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?

YES _____ NO X _____
3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in CFR Part 112 Appendix C Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility could cause injury to an environmentally sensitive area as defined in CFR Part 112 Appendix D?

YES _____ NO X _____
4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?

YES _____ NO X _____
5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

YES _____ NO X _____

* If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION

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



Signature

Facility Site Manager, WHSL
Title

Mike Kaha
Name (please type or print)

4/20/2008
Date

**Appendix B:
Oil Spill Response and Emergency Plan Notification Check-Off
List, Spill Response Flowchart**

Date: _____

**WEST HAWAI'I SANITARY LANDFILL
OIL SPILL EMERGENCY PLAN**

NOTIFICATION CHECK-OFF LIST

AGENCY	TIME	CONTACT NAME
Facility Site Manager, Mike Kaha Office: (808) 886-0940 Mobile: (808) 960-9343	_____	_____
WMH Environmental Protection Manager, Justin Lottig Office: (808) 668-2985 Mobile: (808) 479-0749	_____	_____
Cleanup Contractors Pacific Commercial Services, LLC (808) 545-4599	_____	_____
Fire/Police Department Emergency 911	_____	_____
National Spill Response Center (NSRC) (800) 424-8802	_____	_____
U.S. EPA (202) 267-2675	_____	_____
Chemtrek Emergency Response Information Service (800) 424-9300	_____	_____
State of Hawai'i, Hazardous Materials and Waste Management Division (808) 586-4249	_____	_____
Hawai'i Department of Health (808) 586-4240	_____	_____
Hospital North Hawai'i Community Hospital, INC 67-1125 Mamalahoa Highway Kamuela, Hawai'i 96743 Telephone: (808) 885-4444	_____	_____

NATIONAL RESPONSE CENTER OIL SPILL REPORT

Call Washington, D.C. - Toll Free (800) 424-8802

Place spill response trigger level here

Write out report before calling and READ it to the person receiving your call.

I am reporting an oil spill on behalf of the West Hawai'i Sanitary Landfill,
located at 71-1111 Queen Kaahumanu Highway, Waikoloa, Hawai'i 96738

My name is _____

The spill occurred at (location, date, time): _____

Phone number where person reporting
release can be contacted: _____

Facility phone number (if different): _____

I estimate the quantity of the spill to be (gallons or barrels and product): _____

Source of the discharge: _____

Description of the affected media: _____

Cause of the discharge: _____

Damages or injuries caused by the discharge: _____

Actions being used to stop, remove, and mitigate the effects of the discharge: _____

Is an evacuation of the area required? _____

Call made _____
Date Time

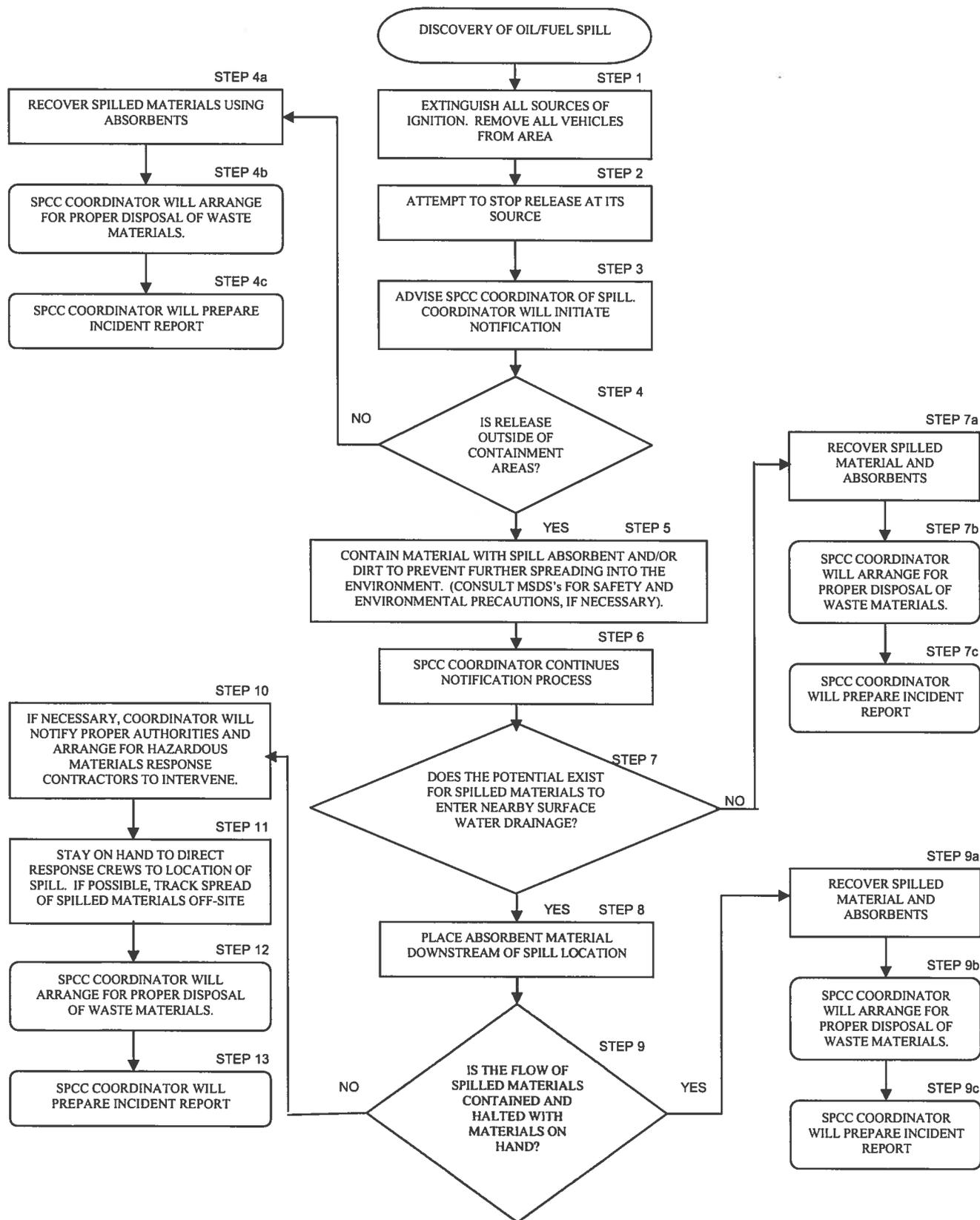
Name of person you report to Name _____

Title/Rank _____

Please note any further discussion other than the message you read to them (use reverse side if more space is needed).

WEST HAWAII SANITARY LANDFILL

SPILL RESPONSE FLOWCHAT



**Appendix C:
Facility Inspection Report**

SPILL PREVENTION CONTROL AND COUNTERMEASURES FACILITY INSPECTION REPORT

Facility Name:	
Inspection Date:	X = Satisfactory
Time: AM PM	NA = Not Applicable
Inspector:	O = Repair or Adjustment Required
Reviewed By:	C = See Comment under Remarks

Drainage

ASTs

	Any noticeable oil sheen in drainage pathways (check concrete-lined tertiary containment system)	Tank foundation intact.
		Tank surfaces checked for signs of leakage.
	No visible sheen in tank containment areas	Tank condition good (no severe rusting, corrosion, damage).
	Annular spaces in double-walled tanks are clean	Level gauges or alarms working properly, if equipped. (__ Monthly oper. check)
		Vents not obstructed or damaged.
		Valves, flanges, and gaskets are free from leaks.
		Containment walls/curb/berm intact.
		Bolts, rivets, seams, not damaged.
		Containers/Drums
	Oil/Water Separator	Containers/drums in acceptable & non-leaking condition
	Oil/water separator is functioning properly	Containers/drums properly marked
	Oil/water separator effluent has a sheen	Containers/drums placed inside a containment device

Piping

Fuel Truck Unloading Area

	No signs of corrosion damage to piping or supports.	Warning Signs Posted.
	No leaks at valves, flanges, or other fittings.	No leaks in hoses.
		Containment intact.
		Spill supplies stocked, accessible.

Security

Training / Documentation

	Lighting is adequate and working properly.		Spill prevention training held annually?
	Spill supplies stocked, accessible.		Training records are documented.
	Fencing and gates are functional		Inspection records in order.
			Tanks properly marked OK?

Remarks: _____

**Appendix D:
General Training Guidelines**

GENERAL TRAINING GUIDELINES

TRAINING SHOULD BE PROVIDED FOR OIL AND OIL PRODUCTS HANDLING PERSONNEL AT THE FOLLOWING TIMES:

- A. AT SYSTEM START UP**
- B. WITHIN THE FIRST WEEK OF UNSUPERVISED EMPLOYMENT FOR NEW OIL AND OIL PRODUCTS HANDLING PERSONNEL**
- C. ANNUALLY THEREAFTER**

SUGGESTED TRAINING TOPICS INCLUDE THE FOLLOWING:

- I. OVERVIEW OF SPCC PLAN**
- II. OVERVIEW OF POLLUTION CONTROL LAWS, RULES & REGULATIONS**
- III. FUEL STORAGE & DISPENSING SYSTEM EQUIPMENT AND OPERATIONAL PROCEDURES**
- IV. SPILL PREVENTION CONTROL DEVICES AND EQUIPMENT**
- V. EMERGENCY RESPONSE PROCEDURES**

SPCC TRAINING ATTENDANCE RECORD		
PERSONNEL NAME	DATE	SIGNATURE
	SAMPLE	