

Resolution No. 133

WHEREAS, General Condition No. 15 of NPDES Permit No. WA-002502-0 (Attachment I of the Site Certification Agreement) for the Skagit Nuclear Power Project Units 1 and 2 requires that the certificate holder obtain Council approval of plans outlining preventive, surveillance and corrective measures designed to protect against the introduction of foreign substances to discharge points; and

WHEREAS, The Puget Sound Power and Light Company by letter on November 23, 1977, did submit an Oil and Hazardous Substance Spill Prevention, Control, and Countermeasures Plan, Document No. NPDES-G15, to the Energy Facility Site Evaluation Council for its review and approval; and

WHEREAS, the Council did consider this plan at its regular meeting of January 9, 1978, and did advise the certificate holder on January 12, 1978, of recommended refinements for inclusion in the plan; and

WHEREAS, the Puget Sound Power and Light Company by letter of February 6, 1978, did resubmit the Oil and Hazardous Substance Spill Prevention, Control, and Countermeasures Plan, annotated as Revision 1; and

WHEREAS, the revised plan has been reviewed for compliance with the requirements of General Condition No. 15 of the NPDES permit;

NOW, THEREFORE, BE IT RESOLVED by the Energy Facility Site Evaluation Council that the Oil Spill Prevention and Countermeasures Plan, Revision 1, attached hereto, is accepted and approved by the Council.

Dated this 27th day of February 1978.

WASHINGTON STATE ENERGY FACILITY  
SITE EVALUATION COUNCIL

BY Nicholas D. Lewis  
Nicholas D. Lewis  
Chairman

ATTEST:

BY William L. Fitch  
William L. Fitch  
Executive Secretary

APPROVED AS TO FORM:

BY Thomas F. Carr  
Thomas F. Carr  
Assistant Attorney General

PUGET SOUND POWER & LIGHT COMPANY

SKAGIT NUCLEAR POWER PROJECT

OIL & HAZARDOUS SUBSTANCE SPILL

PREVENTION, CONTROL, & COUNTERMEASURES PLAN

DOCUMENT NO. NPDES-G15

January 1978

(Revision 1)

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FIGURE

TITLE

1.

Discharge/Spill Reporting

## 1.0 PURPOSE

This procedure defines the Oil & Hazardous Substance Spill Prevention, Control, and Countermeasures Plan that will be implemented during the construction phase of the Skagit Nuclear Power Project. The procedure is designed to provide control measures that comply with the relevant requirements established by referenced documents.

## 2.0 SCOPE

The procedure describes the oil & hazardous substance spill prevention facilities, plans, controls, and reporting methods.

## 3.0 REFERENCES

1. State of Washington, 1974. Skagit Nuclear Power Project Washington State Site Certification Agreement, Attachment I, NPDES Permit, General Condition G15. Olympia, Washington.
2. Department of Transportation, 1976, Pollution By Oil and Hazardous Substances, Liability; Federal Register Vol. 41, No. 59. Washington, D.C.
3. U.S. Environmental Protection Agency, 1972. Processes, Procedures, and Methods to Control Pollution Resulting From All Construction Activity. EPA 430/9-73-007. Washington, D.C.
4. G.S.A. Office of Federal Register, National Archives and Record Services, 1976. 40 CFR Part 112, Oil Pollution Prevention. Washington, D.C.
5. G.S.A. Office of Federal Register, National Archives and Record Services, 1976, 33 CFR Part 153, Navigation in Navigable Waters, Control of Pollution by Oil and Hazardous Substances, Discharge Removal. Washington, D.C.

## 4.0 DEFINITIONS

The following definitions of terms are quoted directly from the references cited:

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

Discharge - includes, but is not limited to, any spilling, leaking, pumping, pouring, emptying, or dumping.

Spill - a discharge of oil into or upon the navigable waters of the United States or adjacent shorelines in harmful quantities.

Hazardous Substances - e.g., fuels, oils, solvents, chemicals, grease, cement truck washings, etc.

Harmful Quantities - including discharges which:

- (a) violate applicable water quality standards, or
- (b) cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge emulsion to be deposited beneath the surface of water or adjoining shorelines.

Navigable Waters - means the waters of the United States.

## 5.0 SECURITY

Operating procedures and devices shall be employed to prevent vandalism and sabotage at the petroleum transfer and storage facilities. These include, but are not limited to:

1. Fences surrounding the construction site and/or around storage facilities.
2. Guards at the construction site entrance.
3. Guards to patrol the site during nonworking hours.
4. Warning and No Smoking signs.
5. Locking mechanisms on pumps and valves.
6. Area lighting in the vicinity of the storage facilities.

## 6.0 SITE DESIGN FEATURES

### 6.1 Ditches & Ponds

The plant construction area will be drained by utilizing the natural land topography and a series of diversion ditches capable of collecting, controlling, and routing spilled materials into collection ponds located within the job site boundaries. These ponds will entrap and contain oil or other hazardous substances until appropriate cleanup action can be taken.

### 6.2 Storage Facilities

#### 6.2.1 General

During the preliminary stages of construction, until the permanent storage facilities are constructed, hazardous materials, e.g., petroleum products, solvents, detergents, etc., will be stored at various places on the jobsite but always within the diversion ditch pond collector system.

When the permanent storage facilities have been constructed, all petroleum products and other hazardous materials will be stored in designated storage areas. These designated areas will be designed and constructed to limit the spread of oil to the smallest possible area.

All storage facilities will be located within the jobsite and contractors will be required to store petroleum products and other hazardous materials within designated areas.

Prior to the completion of the site fire protection system, fire extinguishing facilities will be available to contain fires. These facilities will be commensurate with existing fire protection standards for combustible materials. An agreement between Puget and the local fire protection agencies will be adopted to provide adequate protection in accordance with Site Certification Agreement Article IV E1.

#### 6.2.2 Underground Bulk Storage Facilities

All underground storage tanks will be protected from corrosion by applying an appropriate protective coating prior to burial or will be protected by a cathodic or other protective system compatible with local soil conditions. Buried tanks will be subjected to pressure testing in accordance with the applicable State and National codes for buried tanks. \*

#### 6.2.3 Above Ground Bulk Storage Facilities

Above ground bulk storage areas will be designed and constructed to provide a secondary means of containment equal to 110 percent of the volume of the largest tank located within the area.

Periodic inspections of the tanks, tank supports, storage areas, and secondary containment system will be conducted throughout the construction phase of the Project. Security of the tanks and storage area shall comply with the requirements stated in paragraph 5.0.

#### 6.2.4 Storage of Hazardous Materials Other Than Petroleum Products

The storage requirements for hazardous materials other than petroleum products will be similar to the requirements for petroleum products and may include bulk storage sheds, storage lockers, etc., located on the approved sites within the jobsite diversion ditches described in paragraph 6.1. The requirement to contain, control and cleanup such substances will be equal to the requirements previously stated for petroleum products.

### 7.0 CONTRACTOR OPERATING REQUIREMENTS

All contractors will be required to adhere to the provisions presented in this plan. Some additional job related contractor requirements are:

1. Contractors shall be responsible for ensuring that discharges of all hazardous substances are collected and placed into suitable containers for off-site disposal.
2. Contractors shall be responsible for transporting and delivery of all hazardous substance waste to approved off-site disposal facilities.

\* Present codes do not contain any criteria for testing except at the completion of manufacture.

3. Contractors shall be solely responsible for obtaining all permits that are, or may be, required to dispose of hazardous substances as waste. The contractor shall also be liable for damages resulting from such disposal actions.
4. Contractors will be required to store hazardous substances on level, curbed storage pads or in level storage areas that are surrounded by a berm or dike capable of containing 110 percent of the volume of the largest tank or container located in that storage area. These areas shall be located at an approved site within the jobsite diversion ditches described in paragraph 6.1, and shall be designed and constructed to permit water to be removed or drained without discharging any hazardous substances with the water.
5. Contractors shall perform major maintenance and field service in designated areas and shall store maintenance materials within those areas. Designated areas shall be approved by Bechtel and Puget's Environmental Supervisor.
6. Contractors shall keep all traveling equipment in a state of repair that will minimize the discharge of hazardous substances, e.g., gasoline, oil, grease, hydraulic fluids, or chemicals.
7. Contractors shall not park vehicles that are not in use outside of designated areas.
8. Contractors shall be responsible to ensure that any of their equipment or vehicles operating in close proximity to a natural stream will be moved to an area where any leakage or spillage can be contained or controlled from entering the streams during servicing and fueling operations.
9. Contractors shall be solely responsible for the cleanup and disposal of all hazardous material spills and contamination (regardless of size) caused or contributed to by employees, equipment or materials under their jurisdiction.
10. Contractors shall ensure that their employees are made aware of these requirements through training programs.
11. Contractor's employees shall be responsible for reporting discharges to their immediate supervisor who will be responsible for beginning containment operations immediately and reporting the discharge to Bechtel's representative at the earliest possible time.
12. The Contractor shall develop a surveillance system designed to ensure that the requirements of this plan are met. The contractor surveillance system must be approved by Bechtel and Puget and shall include as a minimum the following:
  - a. Who is responsible for maintaining and implementing the surveillance system.
  - b. What is to be inspected and tested and to what criteria.
  - c. When and by whom inspections and tests shall be performed.
  - d. Hold and witness points, where applicable.

8.0 CONTAINING AND CLEANING UP SPILLS THAT ESCAPE IN-PLACE CONTAINMENT STRUCTURES

8.1 Equipment and Materials

Equipment and materials shall be readily available to keep discharges, which occur outside the in-place containment structures, from flowing into streams or ponds. Equipment and materials to be available to contain spills anywhere on the site are: booms, assorted sorbent materials, shovels, boards, or other appropriate material for constructing temporary containment structures.

Contractors shall provide on-site construction service vehicles with shovels and/or hoes that can be used by the vehicle operator to quickly build a small diversion or containment dike system.

8.2 Containment and Countermeasures Procedures

These general steps shall be followed in the event of a discharge outside the in-place containment structure. These are:

1. Personnel who discover the discharge shall search for and close off the source.
2. Preliminary procedures to contain the oil shall be implemented.
3. Construction foreman and/or on-site authorities shall be notified of the discharge and if a fire danger exists.
4. Additional containment procedures shall be implemented as needed.
5. The contaminated soil and water shall be collected and properly disposed of.
6. Prior to accepting spill cleanup and containment work, Puget Environmental Supervisor shall establish hold and witness points to verify the adequacy of the work.

8.3 Cleanup Organization

Should the magnitude of the discharge be greater than the materials and equipment available are capable of handling, jobsite management should contact any of the following cleanup agencies:

Crowley Environmental Services	Seattle Ph (206) 632-4898 *
Foss Launch & Tug. Co.	Seattle Ph (206) 285-0150
Envirosorb Co.	Edmonds Ph (206) 778-7485
Air O Service, Inc.	Tacoma Ph (206) 537-6561

\* Crowley Environmental Services is presently under an annually renewable contract to Puget to render the required services.

## 9.0 REPORTING OIL AND HAZARDOUS SUBSTANCE DISCHARGES

### 9.1 Jobsite Reporting

When a discharge of oil or hazardous substance occurs or is discovered, notification and reporting of the incident will be as shown in Figure 1.

Bechtel will coordinate containment and/or cleanup operation with the applicable contractors. They shall provide a written report of the incident to Puget's Site Manager and Environmental Supervisor within 24 hours.

### 9.2 Off-site Reporting

As appropriate, Puget will notify state and/or federal agencies.

A spill that may contaminate a navigable waterway shall be reported, as a minimum, to the following individuals or agencies:

- a) Duty Officer, National Response Center  
United States Coast Guard  
400 Seventh Street S.W.  
Washington, D.C. 20590  
Phone: (toll free) 800-424-8802
- b) Executive Secretary  
Energy Facility Site Evaluation Council  
820 East Fifth Avenue  
Olympia, Washington 98504  
Phone: 206-753-7384
- c) Captain of the Port  
United States Coast Guard  
Seattle, Washington 98104  
Phone: 206-442-1874
- d) Northwest Regional Office  
Department of Ecology  
Redmond, Washington 98052  
Phone: 206-885-1900

The above agencies/individuals will be notified of the situation immediately. A written report shall be submitted within seven days of the spill.

## 10.0 SURVEILLANCE

Puget will maintain environmental surveillance during construction activities via the Conservation and Environmental Affairs Department's Environmental Control and Surveillance Team. The Environmental Control and Surveillance Team shall prepare and maintain daily inspection reports containing a description of methods by which work is being accomplished and noting any discrepancies from established environmental control measures.

Hold and witness points will be established where applicable. Action and damage assessment reports will be prepared subsequent to an incident.

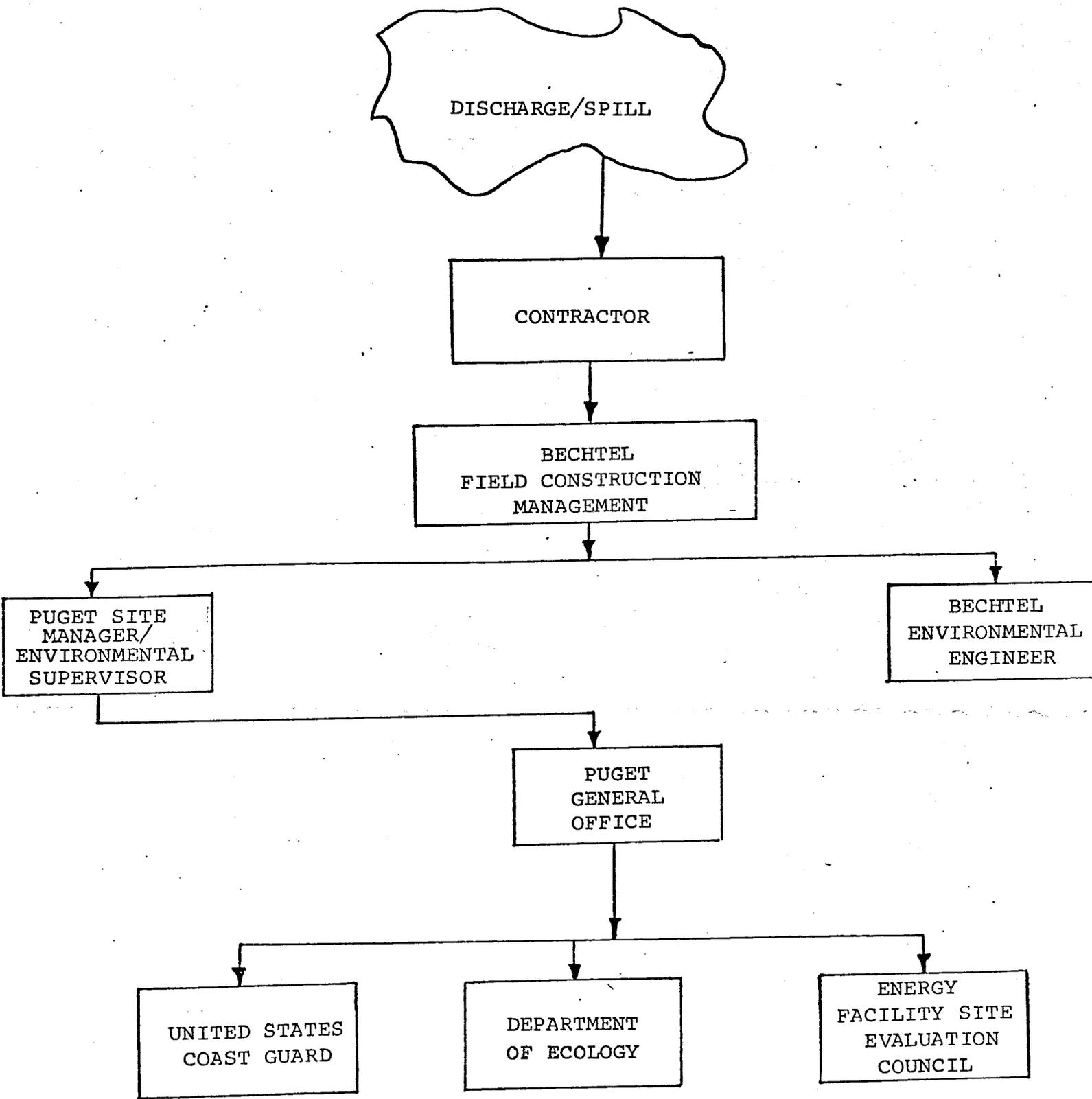


FIGURE 1

DISCHARGE/SPILL REPORTING