KINGDOM COMMUNITY WIND
LOWELL, VERMONT

40 CFR 112

DRAFT SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN

APRIL 2010

PREPARED FOR: GREEN MOUNTAIN POWER CORPORATION
PREPARED BY: ENVIRONMENTAL COMPLIANCE SERVICES, INC.
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PART I
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

1.0 INTRODUCTION

This document presents a Spill Prevention Control and Countermeasure (SPCC) Plan for U.S. Environmental Protection Agency (EPA) SPCC-regulated Green Mountain Power Corporation (GMP) substations, wind farms, service centers, hydropower, diesel generator and gas turbine power generating facilities. The GMP corporate office is located at 163 Acorn Lane in Colchester, Vermont. The Manager of Corporate Services for GMP, Mr. John Tedesco, authorized preparation of this document. The purposes of the SPCC Plan are to describe oil spill prevention measures, oil spill control devices, and countermeasures developed to respond to oil spills. This SPCC Plan complies with the requirements of 40 CFR Part 112 Oil Pollution Prevention.

A copy of this SPCC Plan will be posted within the office of the Manager of Corporate Services (corporate office in Colchester) and at each GMP service center, wind farm facility, hydropower facility, and diesel generator and gas turbine power generating facility. GMP substations are not fully manned, and as a result, the SPCC Plan will not be posted at each substation.

Pursuant to 40 CFR 112.5(b) this SPCC Plan must be reviewed and evaluated every five years, and amended within six months of the review to update the plan, describe changes to facilities, and to include more effective procedures as necessary.

2.0 RESPONSIBLE PARTIES AND CERTIFICATION

The responsible party for management and implementation of this SPCC Plan is:

    Mr. John Tedesco  
    Safety & Environmental Manager  
    Green Mountain Power Corporation  
    163 Acorn Lane  
    Colchester, Vermont 05446  
    (802) 655-8753

Management Approval:

This SPCC Plan will be implemented as described herein:

Signature: ________________________________

Name: John Tedesco.

Title: Safety & Environmental Manager
Professional Engineer’s Certification:

I have examined GMP operations and facilities as described herein and am familiar with the provisions of 40 CFR Part 112. This SPCC Plan was prepared in accordance with good engineering practice and the requirements of 40 CFR Part 112.7.

Signature:

Name:

Registration No: Date:

This certification is contingent upon completion of the improvements and recommendations contained in Part III and IV of this SPCC Plan.

3.0 SPCC PLAN APPLICABILITY

The SPCC regulation, 40 CFR Part 112.1, requires preparation of a SPCC Plan for all non-transportation related facilities which, due to the facility location, could reasonably be expected to discharge oil in harmful quantities into or upon a navigable water or adjoining shoreline, or into or upon the waters of the contiguous zone where such facility has aboveground oil storage capacity equal to or exceeding 1,320 gallons in containers with a capacity of 55 gallons or greater.

GMP owns and operates service centers, substations and electrical power generating stations (hydropower, wind, gas turbines and diesel engines) at various sites throughout its operating territory in Vermont.

Service Centers: There are seven GMP service centers spatially located throughout the service territory. Four of the service centers are SPCC regulated. Generally, service centers contain new and out-of-use oil-filled electrical equipment, have vehicle maintenance facilities, hazardous waste storage areas, and two service centers (Colchester and Montpelier) have fleet fueling gasoline and diesel underground storage tanks. Some vehicle maintenance facilities have underground hydraulic lifts, aboveground storage tanks containing bulk motor oil, waste oil, and other automotive fluids such as antifreeze and transmission fluid.

Electrical Substations: Electrical substations are used for transmission and distribution of electrical power to customers in a local service area. Substations contain oil-filled transformers, oil-filled voltage regulators, oil-filled circuit breakers and capacitors. At a few substations, oil-filled out of use transformers and other electrical equipment temporarily are stored awaiting shipment to regional service centers.

Power Generating Facilities: Power generating facilities generate electricity by means of hydropower, diesel generators, gas turbines and wind turbines. These facilities may have bulk fuel storage containers ranging in size from 20,000-gallons to 1,000,000-gallons, oil-filled equipment, have associated electrical substations, and hazardous waste storage areas.
The GMP service centers, substations, and power generating facilities contained within this SPCC Plan have a regulated capacity of oil storage, and a spill of oil could reasonably be expected to discharge oil in harmful quantities into or upon a navigable water or adjoining shoreline. As a result, federal regulations require preparation of a SPCC Plan. A list of facilities included in this SPCC Plan is included in Part I Section 2.0.

This SPCC Plan is presented with four separate parts. Part I presents general information describing GMP, its facilities and operations. Part I also presents procedures, training and record keeping requirements for all SPCC regulated oil storage locations. Part II of this plan identifies oil storage locations and presents spill categories and generic spill scenarios. A list of required improvements and recommendations for SPCC compliance is presented in Part III. Lastly, Part IV contains building specific SPCC details, including a description of oil storage equipment and facilities.

4.0 GENERAL INFORMATION

4.1 Name, Address, Telephone Number of Owner & Operator

Green Mountain Power Corporation
163 Acorn Lane
Colchester, Vermont 05446

Contact: Mr. John Tedesco.
Safety & Environmental Manager
Office: (802) 655-8753
Mobile: (802) 324-7318
Pager: (802) 450-2336

4.2 Regional Offices

GMP has regional service centers located throughout its service territory. A copy of this SPCC Plan will be posted at each service center, within the corporate office, and at each SPCC regulated power generating facility. Spill response materials (as described in Part I Section 6.1), are stored at these service centers.

<table>
<thead>
<tr>
<th>Location</th>
<th>Mailing Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Montpelier Service Center</td>
<td>7 Green Mountain Drive</td>
</tr>
<tr>
<td>7 Green Mountain Drive</td>
<td>Montpelier, VT 05602-2708</td>
</tr>
<tr>
<td>Montpelier, Vermont</td>
<td>Tel. (802) 229-7859</td>
</tr>
<tr>
<td>b) Colchester Service Center</td>
<td>163 Acorn Lane</td>
</tr>
<tr>
<td>163 Acorn Lane</td>
<td>Colchester, VT 05446</td>
</tr>
<tr>
<td>Colchester, Vermont</td>
<td>Tel. (888) 835-4672</td>
</tr>
</tbody>
</table>
4.3 Description of Company Organization and Operation

GMP is an investor-owned electrical utility serving electrical customers in the western, southern and central regions of Vermont. GMP’s activities are classified under North American Industrial Classification System (NAICS) Code 22112. Electrical power is either purchased or generated for transmission and distribution to customers. Power generating capacity is available through the company's hydroelectric, diesel, wind, and gas-turbine generating plants. Purchasing arrangements are in-place with in-state and out-of-state power producers. GMP’s major service areas include the Waterbury-Barre-Montpelier area in Central Vermont; and Essex Junction, South Burlington, and Shelburne in Western Vermont. In the more rural areas, service is provided to regions of Caledonia County (Ryegate, Barnet and West Danville), Southern Vermont (Readsboro, Dover and Wilmington) and Central Vermont (Waitsfield, Marshfield and Warren).

4.4 Types of Oil and Hazardous Materials

Types of oil and hazardous materials stored at service centers, substations, and power generating facilities are fuels (kerosene, diesel, gasoline), and oils (electrical insulating oil, motor oil, waste oil, gear oil, transmission oil).

Transformer Oil: The transformers and other electrical components in use at the substations and stored at service centers are filled with a petroleum-based electrical insulating oil. This product is often referred to as "mineral oil". It has a specific gravity of 0.85 to 0.90, a neutral pH, a negligible vapor pressure and a flash point of greater than 280 degrees Fahrenheit. It is further classified as non-reactive and non-corrosive. The National Fire Protection Association (NFPA) Hazard Identification System identifies its health hazard as 1, its flammability as 1, and its
reactivity as 0. It is generally classified as a non-combustible material. The oil, when intended for disposal, is not classified as a federal hazardous waste, but is regulated by the Vermont Agency of Natural Resources as waste oil exempt from many of the State of Vermont Hazardous Waste Management Regulations. The oil when mixed with polychlorinated byphenols (PCBs) may be classified as a State of Vermont hazardous waste and Toxic Substance Control Act (TSCA) waste, and when mixed with dirt/debris during a cleanup event, may be classified as a remediation waste.

The insulating oil is readily skimmed as free product from the surface of watercourses and can be absorbed easily on sand, mixed earth, or commercially available materials. The oil product, when released at substations, will generally be confined to the crushed subgrade, and spread slowly in a horizontal direction until absorbed. The typical recovery methods include excavation and removal of oil-saturated debris when the oil is absorbed in soil and the use of absorbent skimming booms and floating pads when the oil has reached a water surface.

PCB-contaminated oil, defined as oil having a PCB concentration in the range of 50 to 499 ppm, generally have been removed from equipment at most GMP substations. PCB oils have been replaced in electrical components with 10C mineral oil. However, PCB oils are still present in about half of the pole-mounted transformers in the distribution system.

Kerosene: No. 1 fuel oil, also known as kerosene and used at Berlin Plant #5, has a flash point of greater than 100 degrees Fahrenheit and a specific gravity of 0.79 to 0.85. The NFPA health hazard code is 0, reactivity code is 0, and flammability hazard code is 2. It is classified by OSHA and NFPA as a Class II Combustible Liquid. Kerosene as a waste does not meet State and Federal hazardous waste definitions of an ignitable waste due to the material’s higher flash point. When intended for disposal, waste containing greater than 5% by weight of petroleum distillates with melting points less than 100 degrees Fahrenheit is classified by the Vermont Agency of Natural Resources as a hazardous waste.

The specific gravity of the oil facilitates removal from a water surface. In soils, the oil can be expected to migrate faster and to deeper levels within the subsurface than heavier oils. The following table presents physical and hazard characteristics of kerosene.
# Physical and Hazard Characteristics of Kerosene

<table>
<thead>
<tr>
<th>Property</th>
<th>Value</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Kerosene</td>
<td>Also called No. 1 Fuel Oil</td>
</tr>
<tr>
<td>Appearance</td>
<td>Pale yellow to water-white liquid with characteristic petroleum odor.</td>
<td></td>
</tr>
<tr>
<td>Flash Point</td>
<td>&gt;100 °F</td>
<td>Does not vaporize rapidly, but can be ignited by open flame; classified by OSHA and NFPA as Class II Combustible Liquid.</td>
</tr>
<tr>
<td>Vapor Pressure</td>
<td>0.4 mm Hg</td>
<td>Does not vaporize rapidly even though it is classified as 100% volatile components.</td>
</tr>
<tr>
<td>Lower Explosive Limit</td>
<td>0.7%</td>
<td>Concentration of vapor in air that will burn (minimum needed). Any less will be too lean to burn.</td>
</tr>
<tr>
<td>Boiling Point</td>
<td>300 to 580 °F</td>
<td>Kerosene is a mixture of components which have moderate to high boiling points,</td>
</tr>
<tr>
<td>Autoignition Temperature</td>
<td>410 °F</td>
<td>Temperature at which liquid will ignite without ignition source present. This temperature is unlikely to be present at site.</td>
</tr>
<tr>
<td>Upper Explosive Limit</td>
<td>0.5%</td>
<td>Highest concentration of vapor in air that will burn. Any more will be too rich to burn.</td>
</tr>
<tr>
<td>Specific Gravity, Vapor</td>
<td>4.5</td>
<td>Heavier than air, vapors will pocket in low areas.</td>
</tr>
<tr>
<td>Specific Gravity, Liquid</td>
<td>0.79 to 0.85</td>
<td>Lighter than water, will float on water or water table</td>
</tr>
<tr>
<td>Evaporation Rate</td>
<td>&lt; 25% in 24 hours</td>
<td>Slow evaporation rate, able to recover free product</td>
</tr>
<tr>
<td>Solubility in Water</td>
<td>Negligible</td>
<td>Almost no product dissolves in surface or groundwater.</td>
</tr>
<tr>
<td>NFPA Health Hazard</td>
<td>0 - Negligible</td>
<td>Avoid skin contact and breathing accumulated vapors.</td>
</tr>
<tr>
<td>NFPA Fire Hazard</td>
<td>2 - Moderate</td>
<td>Avoid open flames or other strong ignition sources.</td>
</tr>
<tr>
<td>NFPA Reaction Hazard</td>
<td>0 – Negligible</td>
<td>Oil is stable and does not react with other common materials.</td>
</tr>
<tr>
<td>UN Identification</td>
<td>1223</td>
<td>Important for emergency responders to know.</td>
</tr>
<tr>
<td>CAS Identification</td>
<td>8008-20-6 91-20-3</td>
<td>Important for emergency responders to know. First number is generic kerosene, second number is naphthalene which is typically &lt; 3% of total, but which can be health hazard.</td>
</tr>
</tbody>
</table>

## Motor Oil and Automatic Transmission Fluids:

The motor oils and automatic transmission fluids stored in bulk tanks inside the maintenance garages have a specific gravity of 0.86 to 0.88, a negligible vapor pressure and a flash point of greater than 350 degrees Fahrenheit. These fluids are further classified as non-reactive and non-corrosive. The NFPA Hazard Identification System identifies the health hazard as 0, flammability 1, and reactivity 0. These oils are generally classified as a Class IIIB Combustible Liquid. The oil, when intended for disposal, is not classified as a federal hazardous waste, but is regulated by the Vermont Agency of Natural Resources.
Resources as waste oil exempt from many of the State of Vermont Hazardous Waste Management Regulations. The oil when mixed with dirt/debris during a cleanup event, may be classified as a remediation waste.

These motor vehicle maintenance fluids are readily skimmed as free product from the surface of water and can be absorbed easily onto mixed soil or commercially available materials. These oil products are utilized within a maintenance garage with concrete floors and can be absorbed onto spill materials if released onto these surfaces.

Diesel Fuel: Diesel generators at Gorge Plant #16, Vergennes Plant #9, and Essex Plant #19 are fueled by diesel fuel. Also, GMP stores diesel fuel in underground storage tanks (USTs) at both the Colchester and Montpelier Service Centers for fleet fueling of company owned vehicles.

Diesel fuel has a flash point of greater than 100 degrees Fahrenheit and a specific gravity of 0.86. The NFPA health hazard code is 0, reactivity code is 0, and flammability hazard code is 2. It is classified by OSHA and NFPA as a Class II Combustible Liquid. Diesel fuel as a waste does not meet State and Federal hazardous waste definitions of an ignitable waste due to the material’s higher flash point. When intended for disposal, waste containing greater than 5% by weight of petroleum distillates with melting points less than 100 degrees Fahrenheit is classified by the Vermont Agency of Natural Resources as a hazardous waste.

The specific gravity of the oil facilitates removal from a water surface. In soils, the oil can be expected to migrate faster and to deeper levels within the subsurface than heavier oils. The following table presents physical and hazard characteristics of diesel fuel.
**PHYSICAL AND HAZARD CHARACTERISTICS OF DIESEL FUEL**

<table>
<thead>
<tr>
<th>PROPERTY</th>
<th>VALUE</th>
<th>COMMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Diesel Fuel</td>
<td>Used for power generation and over-the-road fuel.</td>
</tr>
<tr>
<td>Appearance</td>
<td></td>
<td>Red to water-white liquid with characteristic petroleum odor.</td>
</tr>
<tr>
<td>Flash Point</td>
<td>&gt;100 °F</td>
<td>Does not vaporize rapidly, but can be ignited by open flame; classified by OSHA and NFPA as Class II Combustible Liquid.</td>
</tr>
<tr>
<td>Vapor Pressure</td>
<td>0.5 mm Hg</td>
<td>Does not vaporize rapidly even though it is classified as 100% volatile components.</td>
</tr>
<tr>
<td>Lower Explosive Limit</td>
<td>0.6%</td>
<td>Concentration of vapor in air that will burn (minimum needed). Any less will be too lean to burn.</td>
</tr>
<tr>
<td>Boiling Point</td>
<td>340 to 700 °F</td>
<td>Diesel fuel is a mixture of components which have moderate to high boiling points,</td>
</tr>
<tr>
<td>Autoignition Temperature</td>
<td>495 °F</td>
<td>Temperature at which liquid will ignite without ignition source present. This temperature is unlikely to be present at site.</td>
</tr>
<tr>
<td>Upper Explosive Limit</td>
<td>7.5%</td>
<td>Highest concentration of vapor in air that will burn. Any more will be to rich to burn.</td>
</tr>
<tr>
<td>Specific Gravity, Vapor</td>
<td>&gt; 1</td>
<td>Heavier than air, vapors will pocket in low areas.</td>
</tr>
<tr>
<td>Specific Gravity, Liquid</td>
<td>0.86</td>
<td>Lighter than water, will float on water or water table</td>
</tr>
<tr>
<td>Solubility in Water</td>
<td>Negligible</td>
<td>Almost no product dissolves in surface or groundwater.</td>
</tr>
<tr>
<td>NFPA Health Hazard</td>
<td>0 - Negligible</td>
<td>Avoid skin contact and breathing accumulated vapors.</td>
</tr>
<tr>
<td>NFPA Fire Hazard</td>
<td>2 - Moderate</td>
<td>Avoid open flames or other strong ignition sources.</td>
</tr>
<tr>
<td>NFPA Reaction Hazard</td>
<td>0 – Negligible</td>
<td>Oil is stable and does not react with other common materials.</td>
</tr>
<tr>
<td>UN Identification</td>
<td>1268</td>
<td>Important for emergency responders to know.</td>
</tr>
<tr>
<td>CAS Identification</td>
<td>68476-30-2</td>
<td>Important for emergency responders to know.</td>
</tr>
</tbody>
</table>

Material Safety Data Sheets for these products are attached in Appendix A of this plan.

### 4.5 Typical Site Security Systems

An 8-foot high chain-link security fence some topped with barbed wire surrounds all facilities, including service centers, substations, and power generating facilities. The access gate is locked at all times when personnel are not actually on site. Facilities are equipped with lighting to provide visibility during maintenance work at night. Motion detectors are available at some substations. At substations, high voltage warning signs are posted on all sides of the security fence.
5.0 SPILL REPORTING REQUIREMENTS AND PROCEDURES

All spills are to be immediately reported to the GMP Control Center (802) 655-4411, who is responsible for notifying the Emergency Spill Response Coordinator, John Tedesco (802) 655-8753. The Emergency Spill Response Coordinator is responsible for managing the notification to regulatory authorities.

5.1 In-Facility Notification

In the event of any of the following oil spills, or possible (threats of) spills, the GMP Control Center and subsequently, the Emergency Spill Response Coordinator shall be contacted immediately.

GMP Control Center
(802) 655-4411

Emergency Spill Response Coordinator
John Tedesco, Manager Corporate Services
(802) 655-8753

A Spill Incident Report Form will be filled out for all spills of oil other than incidental spillage < 1 gallon. A copy of the Spill Incident Report Form is included as Appendix B. A copy of the completed form must be attached to this SPCC Plan. Appendix C provides a GMP Spill Response Call List.

5.2 Spill Notification to State and Federal Authorities

Spills involving reportable quantities will be reported to the Vermont Department of Environmental Conservation (DEC) as soon as possible. It is the responsibility of the Emergency Response Coordinator to report a spill to the following agencies using the criteria listed below.

1. All spills that have the potential of posing a threat to the environment will be reported to:

   Agency of Natural Resources
   Department of Environmental Conservation
   (802) 241-3888 (Monday through Friday, 8:00 A.M. to 4:30 P.M.)
   (800) 641-5005 (24-hour dispatch number)

2. Spills of oil that are confined to soil and do not result in a discharge to water are subject to a reportable quantity limit of 2 gallons. Spills of oil that do result in a discharge to water are subject to the reporting requirement if the discharge results in a visible sheen on the water surface, discoloration of the water, deposition of sludge or emulsions beneath the surface or along the adjoining shoreline or if
water quality standards are violated. Any spill of oil, or any other hazardous substance, that exceeds either of these criteria shall be reported to the DEC as well as:

National Response Center  
Washington, D.C.  
(800) 424-8802 (24 hour number)

The following information should be made available for reporting a spill to the National Response Center:

a. Name, address and location of the facility.
b. Source of spill.
c. Time spill was observed.
d. Material and estimated quantity spilled.
e. Current weather conditions.
f. Measures taken to contain the spill.
g. Measures taken or planned for clean-up.
h. Name and telephone number of person calling.

5.3 Written Reporting Requirements

Within 10 days after any incident, the Environmental Response Coordinator shall submit a written report on the incident to the Agency of Natural Resources, DEC, 103 South Main Street, Waterbury, Vermont 05676. The report will include:

a) Name, address and telephone number of the owner or operator;
b) Name, address and telephone number of the facility or substation;
c) Date, time and type of incident;
d) Name and quantity of materials involved;
e) The extent of injuries, if any;
f) An assessment of the actual or potential hazards to human health or the environment, if applicable; and
g) Estimated quantity and disposition of any recovered waste materials that resulted from the incident.

5.4 Notification and Reporting to Federal Authorities

Any spill of oil causing a sheen or visible layer of oil on a navigable waterway must be reported verbally to both the EPA and the U.S. Coast Guard (USCG). The Emergency Spill Response Coordinator is responsible for managing this notification. All calls must be properly documented.

National Response Center (800) 424-8802 (24-hour hotline)

A call to the National Response Center satisfies the requirements for both EPA and USCG notification.

In addition, a written report must be prepared if one of the following events occur:

- Any one oil spill of > 1,000 gallons onto/into a navigable waterway:
- Any two spills causing a visible sheen or layer of oil on a navigable waterway in a 12-month period.

6.0 MANAGEMENT OF EMERGENCY RESPONSE EQUIPMENT, MATERIALS AND SPILL RESIDUALS

6.1 Spill Control and Containment Materials

GMP maintains an inventory of spill control, containment and clean-up materials at service centers and power generating facilities throughout the service territory to allow for immediate response to oil releases. The types, quantities, identification and location of these materials are summarized in Table 2. In addition, GMP utility vehicles contain limited spill response materials including shovels, rakes, absorbent pads and plastic transformer bags.

In general, emergency response equipment and materials are stored in bulk quantities at the service centers and power generating facilities. Spill response equipment and personal protective equipment, is stored in quantities sufficient for the volume and type of spill anticipated. Emergency response equipment storage areas contain a listing and quantity of materials and equipment to be stored in inventory as well as actually on hand. Spill cleanup materials may include sorbing pads and booms, granular sorbents, river booms, and an assortment of hand tools including shovels and rakes. Other equipment includes personal protective clothing (eye protection, gloves, and coveralls), fire extinguishers and first aid supplies. The inventory inspection form is included in Appendix D.

At the conclusion of any spill response activity, it shall be the responsibility of the Emergency Spill Response Coordinator to ensure that all emergency equipment has been cleaned and recharged, and all spill response materials have been restocked for future usage.
6.2 Management and Disposal of Spill Residuals

Residuals (i.e. oil, oil-contaminated soil, water and oil, sorbing materials, vegetation, etc.) from oil spill cleanup, constitute remediation waste pursuant to State of Vermont Hazardous Waste Management Regulations. Spill residuals are to be stored, managed, and disposed of in accordance with industry-wide waste management policies, and within the regulations established by federal, state, and local ordinances.

Oil spill cleanup debris may be stored temporarily at the location of the spill or leak, provided that: (1) the material is stored on an impermeable base or liner; (2) the material is fully covered and secured so as to prevent the material from leaching into the groundwater, or particulates being dispersed by the wind; and (3) cleanup debris is not stored in areas with functioning floor drains or manholes present unless a secondary containment capable of containing the volume of the largest capacity waste container is present. The Emergency Spill Response Coordinator shall take immediate measures to properly dispose of the material in accordance with state and federal hazardous waste disposal regulations.

GMP operates and maintains a landfarm adjacent to the Berlin #5 gas turbine power generating facility located at 144 Nelson Drive in Berlin, Vermont. The landfarm is used for the treatment of petroleum-contaminated soil generated during minor spill events at GMP facilities and pole-mounted transformer spill locations. Portions of the landfarm have been in operation since 1994. The landfarm is maintained in accordance with the DEC Waste Management Division’s Agency Guidelines for Petroleum Contaminated Soil and Debris. The DEC approved landfarming operations in their letter to GMP, dated November 1, 1993.

Waste is deposited into the landfarm annually, during the Spring of each year. During the year, petroleum-contaminated soil containerized in DOT-approved 55-gallon drums are staged at the Montpelier Service Center prior to deposition into the landfarm.

7.0 HEALTH AND SAFETY, RESPONSE PERSONNEL AND TRAINING

7.1 Health and Safety

Oil spills are most likely to occur out-of-doors during routine maintenance. There is no respiratory exposure possible for spills of mineral oil. However, spills of kerosene, diesel fuel and gasoline may create a respiratory exposure. Respiratory exposure via particulate inhalation is possible for a spill of mineral oil containing PCBs. Before any emergency response action is initiated, the source of the spill and evaluation of PCBs is required, as well as an exposure assessment. In general, all sources of ignition in the vicinity of spills shall be immediately eliminated.
All personnel involved in spill response should employ the following general health and safety procedures:

- Don personal protective equipment as soon as possible: eye protection and gloves, over boots and coveralls if necessary.
- If PCB-contaminated oil is present, personnel trained in and approved for the use of respiratory protection equipment should don respirators. Untrained/unapproved personnel should evacuate the spill area.
- Ventilate spill area, if indoors.
- Eliminate all possible sources of ignition.
- Minimize contact with oil.

7.2 Levels of Spill Response

Two levels of spill response personnel are identified, as described below, for spills >1 gallon.

**Level 1 First Response Personnel**

GMP personnel engaged in the handling of oils, or in operations involving oils, must have training in First Response. Level 1 First Responders are responsible for, if safely possible, eliminating the source of the spill (e.g. turn off a pump, close a valve, etc.) and containing the spread of the spill or migration of the spill to drainage ditches (e.g. place sorbent booms around edge of the spill). Personnel trained as Level 1 First Responders should limit contact with oil and limit response actions to defensive measures only.

**Level 2 Spill Response Personnel**

GMP has trained personnel to safely and properly respond to oil spills < 25 gallons. These personnel have training in Level 1 First Response and Level 2 Spill Response. Spill Response Personnel are responsible for characterization, containment and remediation of oil spills.

**Level 3 Spill Response Contractors and Environmental Consultants**

GMP has established master service contracts with professional spill response contractors and environmental consultants for the cleanup of larger spills. In general, for spill greater than 25 gallons, the Emergency Spill Response Coordinator will contact the spill contractor and environmental consultant who will respond to the spill.
Emergency Spill Response Coordinator
Mr. John Tedesco:  (802) 655-8753

Emergency Spill Response Contractor
TMC Services
40 San Remo Dr
S. Burlington, VT 05403
Contact: Sean Sullivan
Office: (802) 863-3334
Pager: (800) 223-8865
Mobil: (802) 316-9290

Emergency Spill Response Consultant
ECS
1 Elm St Suite 3
Waterbury, Vermont 05676
Contact: Thomas Murphy
Office: (802) 241-4131
Pager: (800) 789-3530
Mobil: (802) 338-0787

7.3 Training

GMP will provide annual Employee Right-To-Know (hazard communication) training and annual spill prevention training sessions that will include: instruction in the safety hazards associated with kerosene, diesel fuel, gasoline, motor oil, mineral oil and PCB-contaminated mineral oil; methods for controlling oil spills to minimize the spread of contamination; storage locations and proper use of spill containment products; and the emergency notification procedures. This training will be satisfactory for Level 1 First Responders

Level 2 Spill Response Personnel require additional training in spill characterization, containment and remedial methods. This training will include techniques for removal, labeling and transport of contaminated earth products, review of internal and regulatory documentation required for reportable incidents, and notification procedures. For Level 2 Responders, additional health and safety training and medical monitoring may be required by OSHA as prescribed in 29 CFR Part 1910.120. This training is required for spill response personnel engaged in response activities at hazardous waste operation sites that have been designated for clean-up by state or local government authorities, or for releases or substantial threats of releases of hazardous substances.

GMP will train several field personnel to provide Level 1 First Response. Level 2 Spill Response personnel may respond to oil spill < 25 gallons. Level 1 First Responders will only perform preventative measures to minimize the affect of oil spills. GMP will train a minimum of two personnel to provide Level 2 Spill Response. For spills > 25 gallons, the Emergency Spill Response Coordinator may call the spill response contractor and/or environmental consultant to respond to the spill.

8.0 GENERALIZED SPILL RESPONSE FOR ALL INCIDENTS

The following generalized plan describes the sequence of action that will be taken immediately by GMP personnel in response to a spill or release of oil. More detailed site-specific responses are included in the specific SPCC details included in Part IV of this plan.
1. The Level 1 First Responder at the site should assess the magnitude of the release and flow direction. If a simple, effective measure can be taken to minimize the spread of contamination, it should be carried out immediately until a more permanent measure can be implemented. The personal health and safety of the individual first at the site must not be compromised to carry out this level of response. The Level 1 First Responder shall perform an exposure assessment.

2. The spill incident should be reported to the GMP Control Center (802) 655-4411, who will notify the Emergency Spill Response Coordinator (802) 655-8753.

3. The Emergency Spill Response Coordinator will notify other individuals on the call list. A copy of the call list is included in Appendix C.

4. Expedient measures should then be carried out to prevent the discharge of oil to surrounding streams, rivers and wetlands. These measures may include: use of earth moving equipment to construct temporary earth berms or to dam the drainage path; use of oil absorbent materials to intercept free oil products; installation of oil absorbent skimming booms across entry points to watercourses; and application of absorbent products or collection pans under the source of the identified release.

5. The Emergency Spill Response Coordinator will evaluate the spill and determine whether Level 2 Spill Response or Level 3 Response Contractors/Consultants will respond to the spill. At that time, a comprehensive plan for containment, soil excavation, decontamination, clean-up and restoration will be initiated. When a clean-up will involve an on-going effort, special briefings will be arranged for all involved personnel to address site specific clean-up procedures.

6. When the site is remediated, full documentation of the spill incident shall be completed. If required, an incident report will be prepared and submitted to the appropriate state or federal agencies.

9.0 RECORD KEEPING

The following records are to be maintained GMP:

- Inventory of spill response materials and personal protective equipment (Appendix D).
- A record of the Bi-Monthly Spill Prevention Inspection Form (Appendix E).
- Certifications and records for personnel who have attended formal in-house or out-of-house training programs.
- A completed SPCC Annual Training Form (Appendix F)
• Records of all spills at the facility (see Appendix B for Spill Incident Report Form).
• This SPCC Plan, with any amendments, and updates.
PART II
SPILL CATEGORIES, SCENARIOS, EMERGENCY PROCEDURES AND PREVENTION

1.0 SPILL CATEGORIES AND SCENARIOS

At GMP facilities, there are four unique spill categories based on the volume of oil spilled and whether the spill is controlled or uncontrolled. Controlled oil spills are contained in secondary containment structures or engineered control systems. Controlled spills do not have the potential to migrate to streams, rivers and wetlands. Uncontrolled spills are not contained in structures and have the potential to migrate via sheet flow or drainage conveyance structures to streams, rivers and wetlands. Uncontrolled spills are > 1 gallon in capacity.

Spill categories include: (1) major oil spills > 25 gallons; (2) moderate uncontrolled oil spills between 1 and 25 gallons; (3) moderate controlled oil spills between 1 and 25 gallons; and (4) minor oil spills < 1 gallon.

Site-specific scenarios are presented for each facility in Part IV of this plan. Because oil storage systems are generally similar, generic spill scenarios are applicable to all most facilities.

**Major Oil Spills > 25 Gallons**

This category of oil spill is most severe, typically resulting from a sudden loss of oil from either a large transformers or bulk fuel storage system. For this category of spill, the Emergency Spill Response Coordinator shall notify the emergency spill response contractors and environmental consultant to respond to the spill. First Responders shall safety take defensive measures to stop the spill (i.e. close valve) and divert oil spills from stormwater conveyance structures. The Emergency Spill Response Coordinator shall manage notifying appropriate authorities as described in Part I Sections 5.1 and 5.2 of this plan.

**Moderate Uncontrolled Oil Spill Between 1 and 25 Gallons**

This category of oil spill is also severe and generally results from a sudden loss of oil from either transformers or bulk fuel storage system. This category of spill will be handled similar to the Major Oil Spill category. For moderate uncontrolled oil spills, the Emergency Spill Response Coordinator shall notify the spill response contractors and environmental consultant to respond to the spill. First Responder shall safety take defensive measures to stop the spill (i.e. upright transformer) and divert oil spill from stormwater conveyance structures. The Emergency Spill Response Coordinator shall manage notifying appropriate authorities as described in Part I Sections 5.1 and 5.2 of this plan.
Moderate Controlled Oil Spill Contained In Secondary Containment Structures and/or Engineering Controls Between 1 and 25 Gallons

This category of oil spill is generally resulting from a sudden loss of oil from transformers. A chronic loss of fuel from piping and valves over a period of time may also cause this category of spill. Because this spill is considered controlled (oil contained within secondary containment structures/engineering controls) and presumably will not migrate to streams, rivers and wetlands, GMP First Responders may respond to the spill. As necessary, the Emergency Spill Response Coordinator shall notify spill response contractors and environmental consultant to mitigate the spill. The Emergency Spill Response Coordinator shall manage notifying appropriate authorities as described in Part I Sections 5.1 and 5.2 of this plan.

Minor Oil Spill < 1 Gallon

This category of oil spill is generally resulting from weeping loss of fuel oil at piping unions and valves. Because this spill is considered controlled (oil contained within secondary containment structures/engineering controls) and presumably will not migrate to streams, rivers and wetlands, GMP First Responders may respond to the spill. As necessary, the Emergency Spill Response Coordinator shall notify the spill response contractors and environmental consultant to mitigate the spill. The Emergency Spill Response Coordinator shall manage notifying appropriate authorities as described in Part I Sections 5.1 and 5.2 of this plan.

2.0 EMERGENCY SPILL PROCEDURES

Emergency response equipment and materials, including personal protective equipment, are maintained at service centers and power generating facilities in quantities sufficient for the volume and type of spill anticipated at GMP facilities. Posted at each service center and power generating facility is the inventory of spill response equipment present to mitigate oil spills. Refer to Appendix D for the Spill Materials Inventory Check List. The following types of spill materials include sorbing pads and booms, river booms, granular sorbents, non-sparking shovels, eye protection, gloves, and coveralls. Fire extinguishers and first aid supplies are readily available.

Spill response procedures for each spill category is described below.

A. Small, (<1 gallon) spill to pavement or concrete floor surface

- Turn off all pumps and engines, and eliminate all sources of ignition.
- Contain spill and prevent spill from flowing along pavement/concrete surface toward drainage swales or to floor openings (i.e. cracks, seams, etc.).
Call GMP Control Center: (802) 655-8479. Contact Supervisor. Control Center shall notify the Emergency Spill Response Coordinator, Mr. John Tedesco (802) 655-8753. Emergency Spill Response Coordinator shall manage notification to State and Federal agencies as appropriate, refer to Section 5.1 and 5.2 of this plan.

Close area to non-essential foot and vehicle traffic. Do not allow any personnel, other than trained spill response personnel or supervisors, into spill area.

Wear personnel protective clothing during cleanup phase: gloves, disposable coveralls, eye protection, and respirator, as necessary.

Clean up spill with sorbing materials. Remove any contaminated media. Place spill media/residues in 55-gallon DOT-approved drum, for proper disposal in accordance with local and federal regulations.

Notify the Emergency Spill Response Coordinator, Mr. John Tedesco (802) 655-8753.

Emergency Spill Response Coordinator will fill out Incident Report Form (Appendix B).

**B. Moderate, (1-25 gallon) spill to pavement surface or concrete floor surface**

Turn off all furnaces, pumps and engines, and eliminate all sources of ignition.

Contain spill and prevent spill from flowing along pavement/concrete surface toward drainage swales or to floor openings (i.e. cracks, seams, etc.).

Call GMP Control Center: (802) 655-8479. Contact Supervisor. Control Center shall notify the Emergency Spill Response Coordinator, Mr. John Tedesco (802) 655-8753. Emergency Spill Response Coordinator shall manage notification to State and Federal agencies as appropriate, refer to Section 5.1 and 5.2 of this plan.

Close area to non-essential foot and vehicle traffic. Do not allow any personnel, other than trained spill response personnel or supervisors, into spill area.

Contain spill with sorbent booms, pads and granular sorbents.

Notify respective Fire Department of the spill. Request emergency assistance if needed. Phone number: 911 (generally)

If manageable, clean up spill with sorbent materials. Remove contaminated media. Place spill media in drums for proper disposal in accordance with local and federal regulations.
If not manageable, notify spill response contractor and environmental consultant, Wilcox & Barton, Inc. (802) 496-4747.

Don personnel protective clothing: gloves, disposable coveralls, eye protection, and respirator, as necessary.

Emergency Spill Response Coordinator will fill out Incident Report Form (Appendix B).

C. **Large, (>25 gallon) spill to pavement surface.**

- Turn off all pumps and engines, and eliminate all sources of ignition.
- Contain spill and prevent spill from flowing along pavement toward drainage culvert. Contain spill with sorbent booms, pads and granular sorbents.
- Call GMP Control Center: (802) 655-8479. Contact Supervisor. Control Center shall notify the Emergency Spill Response Coordinator, Mr. John Tedesco (802) 655-8753. Emergency Spill Response Coordinator shall manage notification to State and Federal agencies as appropriate, refer to Section 5.1 and 5.2 of this plan.
- Close area to non-essential traffic. Do not allow any personnel, other than trained spill response personnel or supervisors, into area.
- Notify Fire Department, request emergency assistance: Phone number: 911 (generally).
- Notify Spill Response Contractor and environmental consultant, Wilcox & Barton, Inc. (802) 496-4747.
- Notify appropriate Federal and state authorities.
- Emergency Spill Response Coordinator will fill out Incident Report Form (Appendix B).

3.0 **SITE INSPECTION AND MONITORING FREQUENCY**

All facilities owned and operated by GMP are inspected monthly to monitor the equipment for proper operation, detect any signs of oil leakage, and to confirm the integrity of site access control, safety, and security systems. A copy of the GMP Bi-Monthly Spill Prevention Inspection Form is included in Appendix F.
PART III
SUMMARY OF IMPROVEMENTS AND RECOMMENDATIONS

Site specific recommendations are presented in the Part IV of this plan.
PART IV
FACILITY SPECIFIC SPCC DETAILS
1.0 WIND TURBINE DATA (the facility consists of a maximum of 21 wind towers)

NAME OF FACILITY: Kingdom Community Wind Towers 1 through 21

STREET ADDRESS: Wind Tower Access Road

TOWN: Lowell

COUNTY: Orleans

USGS QUADRANGLE: Lowell, Vermont 1986

TOTAL CAPACITY OF OIL STORAGE: 216 gallons per wind tower (main gear box, drive train brake and rotor lock, yaw drive gear box, yaw hydraulic brake, pitch drive gear box)

LARGEST SINGLE CONTAINER CAPACITY: 185 gallons per wind tower (main gear box)

CLOSEST WATERCOURSE: Unnamed intermittent and ephemeral stream channels in downslope of the wind turbine sites.

DISTANCE AND DIRECTION FROM WIND TURBINE TO WATERCOURSE: Between 250 and 500 (+) feet from the wind turbine sites.

2.0 WIND TURBINE DESCRIPTION

FACILITY DESCRIPTION: The facility consists of up to 21 wind power electrical generation turbines situated on 80 meter towers. Each wind tower/turbine is situated on a 90 meter diameter crushed stone pad enclosed within an 8-foot high chain linked fence.

REGIONAL DRAINAGE: Regional drainage for Turbines 1, 3, 4, 5, 7, 9, 12, 13, 15, 16, and 19 is towards the Missisquoi River Basin which is located west of the wind towers/turbines. Regional drainage for Turbines 2, 6, 8, 10, 11, 14, 17, 18, 20, and 21 is towards the Lake Memphremagog Basin which is located east of the turbines.

FACILITY DRAINAGE: Each tower base is 90 meters in diameter and is constructed with crushed stone. The tower bases are level allowing liquids to temporarily pool on the surface of the crushed stone prior to infiltration.

ENGINEERING CONTROLS AND SECONDARY CONTAINMENT SYSTEMS: A combined 216 gallons of hydraulic and gear oil is present in each turbine. Oil and oil containing components are housed within the turbine housing (nacelle) which will provide adequate general secondary containment. All oil and oil containing components of the turbines are classified as operational equipment under 40 CFR 112.

The wind turbine nacelle and tower are constructed in such a manner that a release of oil from the turbine would be containerized inside the unit, providing sufficient secondary containment.
OIL SPILL MIGRATION ROUTE: If a major, moderate or minor oil spill occurs at a tower the oil would be contained within the structure, as stated above. If an oil spill occurs outside of secondary containment, (from a utility service truck), it is unlikely that oil could migrate to a navigable waterway.

3.0 SPILL SCENARIOS

<table>
<thead>
<tr>
<th>DISCHARGE SCENARIO</th>
<th>SOURCE</th>
<th>TYPE OF FAILURE</th>
<th>VOLUME</th>
<th>RATE</th>
<th>DIRECTION OF FLOW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Worst-case</td>
<td>Wind Turbine</td>
<td>Turbine collapse</td>
<td>216 gallons</td>
<td>216 gal/hr</td>
<td>Containment within the nacelle and tower structure. The need for additional secondary containment will be determined during final design phase.</td>
</tr>
<tr>
<td>Uncontrolled</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Worst-case</td>
<td>Wind Turbine</td>
<td>Turbine collapse</td>
<td>216 gallons</td>
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<td>Containment within the nacelle and tower structure. The need for additional secondary containment will be determined during final design phase.</td>
</tr>
<tr>
<td>Controlled</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td>Wind Turbine</td>
<td>Miscellaneous damage</td>
<td>24 gallons</td>
<td>&lt;24 and &gt;1 gal/day</td>
<td>Containment within the nacelle and tower structure.</td>
</tr>
<tr>
<td>Uncontrolled</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
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</tr>
<tr>
<td>Controlled</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minor release</td>
<td>Wind Turbine</td>
<td>Weep or small leak</td>
<td>&lt;1 gallon</td>
<td>&lt;1 gal/day</td>
<td>Containment within the turbine nacelle.</td>
</tr>
<tr>
<td>Controlled</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4.0 SPILL HISTORY: The facility has not been constructed.

5.0 RECOMMENDATIONS: The facility is designed with proper containment structures to effectively minimize the potential for an oil spill from reaching navigable waters. A spill kit containing a sufficient volume of absorbent materials should be situated at the base of each tower. Additional SPCC related improvements will be determined after construction.
1.0 SUBSTATION DATA

NAME OF SUBSTATION: Kingdom Community Wind #1

STREET ADDRESS: Wind Tower Access Road

TOWN: Lowell

COUNTY: Orleans

USGS QUADRANGLE: Lowell, Vermont 1986

TOTAL CAPACITY OF OIL STORAGE: 12,500 gallons (transformer)

LARGEST SINGLE CONTAINER CAPACITY: 12,500 gallons (transformer)

CLOSEST WATERCOURSE: Unnamed seasonal stream

DISTANCE AND DIRECTION FROM SUBSTATION TO WATERCOURSE: 100 + feet north.

2.0 SUBSTATION DESCRIPTION

FACILITY DESCRIPTION: The facility is an electrical substation utilized for the distribution of electric power generated by twenty-two wind turbines. The facility consists of a crushed stone access driveway and an electric substation enclosed within an 8-foot high chain linked fence.

REGIONAL DRAINAGE: Regional drainage is towards the East branch of the Missisquoi which is located west of the substation.

FACILITY DRAINAGE: The facility is level and surrounded by an engineered berm which contains precipitations to allow for infiltration into the ground. The area surrounding the facility is consists of a northwesterly sloping hill. Surface runoff migrates down the slope toward a small-unnamed stream which eventually flows into the East Branch of the Missisquoi River.

ENGINEERING CONTROLS AND SECONDARY CONTAINMENT SYSTEMS: Oil at the substation is stored within electrical equipment within the substation yard. The largest transformer (12,000 gallons) is contained by a concrete moat that is designed to hold at least 13,200 gallons (110% of largest oil container). The substation yard has an engineered structural berm secondary containment system. The berm is 12 to 18 inches high and 2 feet wide. The berm is constructed inside the substation security fence with compacted crushed stone base that is covered with filter-fabric and stone. The containment system is capable of containing a major oil spill with sufficient capacity for freeboard precipitation.

OIL SPILL MIGRATION ROUTE: If a major, moderate or minor oil spill occurs at the largest transformer, the oil would be contained within the concrete moat. Other oil spills to the substation yard would be contained within the substation. If an oil spill occurs outside of the
secondary containment bermed area of the substation (from a utility service truck) while replacing electrical equipment, it is possible that oil could migrate to the unnamed stream.

3.0 SPILL SCENARIOS

<table>
<thead>
<tr>
<th>DISCHARGE SCENARIO</th>
<th>SOURCE</th>
<th>TYPE OF FAILURE</th>
<th>VOLUME</th>
<th>RATE</th>
<th>DIRECTION OF FLOW</th>
</tr>
</thead>
<tbody>
<tr>
<td>Worst-case</td>
<td>Substation</td>
<td>Catastrophic accident</td>
<td>12,500 gallons</td>
<td>12,500 gal/hr</td>
<td>Contained by secondary containment, other spills outside the secondary containment potentially reaching unnamed stream.</td>
</tr>
<tr>
<td>Uncontrolled</td>
<td>transformer</td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Worst-case</td>
<td>Substation</td>
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<td>Catastrophic accident</td>
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<td>12,500 gal/hr</td>
<td></td>
</tr>
<tr>
<td>Pad-mounted</td>
<td>Pad-mounted</td>
<td>Miscellaneous damage</td>
<td>24 gallons</td>
<td>&lt;24 and &gt;1 gal/day</td>
<td>Contained by secondary containment, other spill outside the secondary containment potentially reaching unnamed stream.</td>
</tr>
<tr>
<td>Uncontrolled</td>
<td>transformers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td>Pad-mounted</td>
<td>Miscellaneous damage</td>
<td>24 gallons</td>
<td>&lt;24 and &gt;1 gal/day</td>
<td>Contained within secondary containment.</td>
</tr>
<tr>
<td>Controlled</td>
<td>Pad-mounted</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minor release</td>
<td>Substation or</td>
<td>Weep or small leak</td>
<td>&lt;1 gallon</td>
<td>&lt;1 gal/day</td>
<td>Contained within secondary containment.</td>
</tr>
<tr>
<td>Controlled</td>
<td>pad-mounted</td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

4.0 SPILL HISTORY: Facility has not been constructed.

5.0 RECOMMENDATIONS: The facility is designed with proper containment structures to effectively minimize the potential for an oil spill reaching navigable waters. A spill kit containing a sufficient volume of absorbent materials should be situated at the substation. Additional SPCC related improvements will be determined after construction.
Appendix A

Material Safety Data Sheets
1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: MOBIL HYDRAULIC OIL AW 46
SUPPLIER: EXXONMOBIL CORPORATION
3225 GALLOWS RD.
FAIRFAX, VA 22037
24 - Hour Health and Safety Emergency (call collect): 609-737-4411
24 - Hour Transportation Emergency:
CHEMTREC: 800-424-9300 202-483-7616
LUBES AND FUELS: 281-834-3296
Product and Technical Information:
Lubricants and Specialties: 800-662-4525 800-443-9966
Fuels Products: 800-947-9147
MSDS Fax on Demand: 613-228-1467
MSDS Internet Website: http://emmsds.ihssolutions.com/

2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAMES AND SYNONYMS: SEVERE TREAT MIN. OILS & ADDITIVES
GLOBALLY REPORTABLE MSDS INGREDIENTS: None.
See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

Under normal conditions of use, this product is not considered hazardous according to regulatory guidelines (See section 15).
EMERGENCY OVERVIEW: Dark Amber Liquid. Note: Pressurized mists may form a flammable mixture. DOT ERG No.: NA
POTENTIAL HEALTH EFFECTS: Under normal conditions of intended use, this product does not pose a risk to health. Excessive exposure may result in eye, skin or respiratory irritation.
For further health effects/toxicological data, see Section 11.

4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.
SKIN CONTACT: Wash contact areas with soap and water. Remove and clean oil soaked clothing daily and wash affected area.
INJECTION INJURY WARNING: If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency.
Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

INHALATION: Not expected to be a problem. However, if respiratory irritation, dizziness, nausea, or unconsciousness occurs due to excessive vapor or mist exposure, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or mouth-to-mouth resuscitation.

INGESTION: Not expected to be a problem. Seek medical attention if discomfort occurs. Do not induce vomiting.

5. FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.

SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Note: Pressurized mists may form a flammable mixture.

COMBUSTION PRODUCTS: Fumes, smoke, carbon monoxide, sulfur oxides, aldehydes and other decomposition products, in the case of incomplete combustion.

Flash Point C(F): 198(388) (ASTM D-92).
Flammable Limits (approx.% vol.in air) - LEL: 0.9%, UEL: 7.0%
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills/releases as required to appropriate authorities. U.S. Coast Guard and EPA regulations require immediate reporting of spills/releases that could reach any waterway including intermittent dry creeks. Report spill/release to Coast Guard National Response Center toll free number (800)424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:

LAND SPILL: Shut off source taking normal safety precautions. Take measures to minimize the effects on ground water. Recover by pumping or contain spilled material with sand or other suitable absorbent and remove mechanically into containers. If necessary, dispose of adsorbed residues as directed in Section 13.

WATER SPILL: Confine the spill immediately with booms. Warn other ships in the vicinity. Notify port and other relevant authorities. Remove from the surface by skimming or with suitable absorbents. If permitted by regulatory authorities the use of suitable dispersants should be considered where recommended in local oil spill procedures.

ENVIRONMENTAL PRECAUTIONS: Prevent material from entering sewers, water sources or low lying areas; advise the relevant authorities if it has, or if it contaminates soil/vegetation.

PERSONAL PRECAUTIONS: See Section 8
7. HANDLING AND STORAGE

HANDLING: High pressure injection under the skin may occur due to the rupture of pressurized lines. Always seek medical attention. No special precautions are necessary beyond normal good hygiene practices. See Section 8 for additional personal protection advice when handling this product.

STORAGE: Keep containers closed when not in use. Do not store in open or unlabelled containers. Store away from strong oxidizing agents and combustible materials. Do not store near heat, sparks, flame or strong oxidants.

SPECIAL PRECAUTIONS: Prevent small spills and leakages to avoid slip hazard.

EMPTY CONTAINER WARNING: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to refill or clean container since residue is difficult to remove. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

OCCUPATIONAL EXPOSURE LIMITS:
When mists/aerosols can occur, the following are recommended: 5 mg/m³ (as oil mist) - ACGIH Threshold Limit Value (TLV), 10 mg/m³ (as oil mist) - ACGIH Short Term Exposure Limit (STEL), 5 mg/m³ (as oil mist) - OSHA Permissible Exposure Limit (PEL)

VENTILATION: If mists are generated, use adequate ventilation, local exhaust or enclosures to control below exposure limits.

RESPIRATORY PROTECTION: If mists are generated, and/or when ventilation is not adequate, wear approved respirator.

EYE PROTECTION: If eye contact is likely, safety glasses with side shields or chemical type goggles should be worn.

SKIN PROTECTION: Not normally required. When splashing or liquid contact can occur frequently, wear oil resistant gloves and/or other protective clothing. Good personal hygiene practices should always be followed.

9. PHYSICAL AND CHEMICAL PROPERTIES

Typical physical properties are given below. Consult Product Data Sheet for specific details.

APPEARANCE: Liquid
COLOR: Dark Amber
ODOR: Mild
ODOR THRESHOLD-ppm: NE
pH: NA
BOILING POINT C(F): > 316(600)
MELTING POINT C(F): NA
FLASH POINT C(F): 198(388) (ASTM D-92)
10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.
CONDITIONS TO AVOID: Extreme heat and high energy sources of ignition.
INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers.
HAZARDOUS DECOMPOSITION PRODUCTS: Product does not decompose at ambient temperatures.
HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL DATA

---ACUTE TOXICOLOGY---
ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.
DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.
INHALATION TOXICITY (RATS): Practically non-toxic (LC50: greater than 5 mg/l). ---Based on testing of similar products and/or the components.
EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.
SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

OTHER ACUTE TOXICITY DATA: Although an acute inhalation study was not performed with this product, a variety of mineral and synthetic oils, such as those in this product, have been tested. These samples had virtually no effect other than a nonspecific inflammatory response in the lung to the aerosolized mineral oil. The presence of additives in other tested formulations (in approximately the same amounts as in the present formulation) did not alter the observed effects.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---
No significant adverse effects were found in studies using repeated
dermal applications of similar formulations to the skin of laborator y animals for 13 weeks at doses significantly higher than those expected during normal industrial exposure. The animals were evaluated extensively for effects of exposure (hematology, serum chemistry, urinalysis, organ weights, microscopic examination of tissues etc.).

---REPRODUCTIVE TOXICOLOGY (SUMMARY)---
No teratogenic effects would be expected from dermal exposure, based on laboratory developmental toxicity studies of major components in this formulation and/or materials of similar composition.

---CHRONIC TOXICOLOGY (SUMMARY)---
Repeated and/or prolonged exposure may cause irritation to the skin, eyes or respiratory tract. Overexposure to oil mist may result in oil droplet deposition and/or granuloma formation. For mineral base oils: Base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of severely treated oils showed no evidence of carcinogenic effects. These results are confirmed on a continuing basis using various screening methods such as Modified Ames Test, IP-346, and/or other analytical methods. For synthetic base oils: The base oils in this product have been tested in the Ames assay and other tests of mutagenicity with negative results. These base oils are not expected to be carcinogenic with chronic dermal exposures.

---SENSITIZATION (SUMMARY)---
Not expected to be sensitizing based on tests of this product, components, or similar products.

12. ECOLOGICAL INFORMATION

ENVIRONMENTAL FATE AND EFFECTS:
In the absence of specific environmental data for this product, this assessment is based on information for representative products.
ECOTOXICITY: Available ecotocicity data (LL50 >1000 mg/L) indicates that adverse effects to aquatic organisms are not expected from this product.
MOBILITY: When released into the environment, adsorption to sedi ment and soil will be the predominant behavior.
PERSISTENCE AND DEGRADABILITY: This product is expected to be inherently biodegradable.
BIOACCUMULATIVE POTENTIAL: Bioaccumulation is unlikely due to the very low water solubility of this product, therefore bioavailability to aquatic organisms is minimal.

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL: Product is suitable for burning in an enclosed, controlled burner for fuel value. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at an appropriate government waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR,
Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity. The unused product is not formulated with substances covered by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

14. TRANSPORT INFORMATION

USA DOT: NOT REGULATED BY USA DOT.  
RID/ADR: NOT REGULATED BY RID/ADR.  
IMO: NOT REGULATED BY IMO.  
IATA: NOT REGULATED BY IATA.  
STATIC ACCUMULATOR (50 picosiemens or less): YES

15. REGULATORY INFORMATION

US OSHA HAZARD COMMUNICATION STANDARD: When used for its intended purposes, this product is not classified as hazardous in accordance with OSHA 29 CFR 1910.1200.  
EU Labeling: Product is not dangerous as defined by the European Union Dangerous Substances/Preparations Directives. EU labeling not required.  
Governmental Inventory Status: All components comply with TSCA, EINICS/ELINCS, AICS, DSL, KOREA, and PHILIPPINES.  
U.S. Superfund Amendments and Reauthorization Act (SARA) Title III: This product contains no "EXEMPLARY HAZARDOUS SUBSTANCES".  
SARA (311/312) REPORTABLE HAZARD CATEGORIES: None.  
This product contains no chemicals subject to the supplier notification requirements of SARA (313) toxic release program.  
The following product ingredients are cited on the lists below:  
CHEMICAL NAME                          CAS NUMBER     LIST CITATIONS  
-------------                          ----------     --------------  
ZINC (ELEMENTAL ANALYSIS) (<0.05%)     7440-66-6     22  
PHOSPHORODITHIOIC ACID, O,O-DI         68649-42-3     22  
C1-14-ALKYL ESTERS, ZINC SALTS (2:1) (ZDDP) (0.43%)  

--- REGULATORY LISTS SEARCHED ---  
1=ACGIH ALL  6=IARC 1  11=TSCA 4  16=CA P65 CARC  21=LA RTK  
2=ACGIH A1  7=IARC 2A  12=TSCA 5a2  17=CA P65 REPRO  22=MI 293  
3=ACGIH A2  8=IARC 2B  13=TSCA 5e  18=CA RTK  23=MN RTK  
4=NTP CARC  9=OSHA CARC  14=TSCA 6  19=FL RTK  24=NJ RTK  
5=NTP SUS  10=OSHA Z  15=TSCA 12b  20=IL RTK  25=PA RTK  
26=RI RTK  
Code key: CARC=Carcinogen; SUS=Suspected Carcinogen; REPRO=Reproductive

16. OTHER INFORMATION

USE: HYDRAULIC OIL  
NOTE: PRODUCTS OF EXXON MOBIL CORPORATION AND ITS AFFILIATED COMPANIES ARE NOT FORMULATED TO CONTAIN PCBs.  
Health studies have shown that many hydrocarbons pose potential human health risks which may vary from person to person. Information provided on this MSDS reflects intended use. This product should not be used for...
other applications. In any case, the following advice should be considered:

INDUSTRIAL LABEL

Under normal conditions of intended use, this product does not pose a risk to health. Excessive exposure may result in eye, skin or respiratory irritation. Always observe good hygiene measures. First Aid: Wash skin with soap and water. Flush eyes with water. If overcome by fumes or vapor, remove to fresh air. If ingested do not induce vomiting. If symptoms persist seek medical assistance. Read and understand the MSDS before using this product.

*************************************************************************

EHS Approval Date: 13JUN2003
*************************************************************************

*************************************************************************

Legally required information is given in accordance with applicable Information given herein is offered in good faith as accurate, but without guarantee. Conditions of use and suitability of the product for particular uses are beyond our control; all risks of use of the product are therefore assumed by the user and WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. Nothing is intended as a recommendation for uses which infringe valid patents or as extending any license under valid patents. Appropriate warnings and safe handling procedures should be provided to handlers and users. Use or re-transmission of the information contained herein in any other format than the format as presented is strictly prohibited. ExxonMobil neither represents nor warrants that the format, content or product formulas contained in this document comply with the laws of any other country except the United States of America.

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MATERIAL SAFETY DATA SHEET

Perkin Elmer LLC
761 Main Avenue
Norwalk, CT 06859
Phone: (203) 762-1000

Product: Mineral Oil
Part Number: 0990-5931
MSDS Number: X990-5931
Revision: B
Date: April 11, 1994

SECTION I: MATERIAL IDENTIFICATION

TRADE/MATERIAL NAME: Mineral Oil.
SYNONYMS: Nujol Oil, white mineral oil, liquid petrolatum.
CHEMICAL FORMULA: No data found.
CAS NUMBER: 8012-95-1
MOLECULAR WEIGHT: No data found.
DOT HAZARD CLASS: No data found.

SECTION II: INGREDIENTS AND HAZARDS

HAZARDOUS INGREDIENTS: Mineral oil.

PRECAUTIONARY MEASURES:

Avoid inhalation, ingestion and contact with eyes and skin.
Wear chemical resistant goggles, face shield, gloves and clothing.
Wear NIOSH/MSHA approved respirator.
Use in a laboratory hood or with local exhaust.
Wash thoroughly after use.
Keep container tightly sealed when not in use.

SECTION III: PHYSICAL DATA

APPEARANCE: Clear, colorless viscous liquid.
ODOR: Slight petroleum oil odor.
SOLUBILITY: Insoluble in water.
BOILING POINT: No data found.

MELTING POINT: No data found.

SPECIFIC GRAVITY (Water=1): 0.838

VAPOR DENSITY (Air=1): No data found.

VAPOR PRESSURE (mm Hg): No data found.

EVAPORATION RATE: No data found.

FLASH POINT: No data found.

FLAMMABLE LIMITS: No data found.

SECTION IV: FIRE AND EXPLOSION INFORMATION

FIRE: Evacuate all persons not engaged in fire fighting. Water fog may be used to cool exposed equipment and containers. Water sprayed directly on the fire will cause the burning liquid to float and the fire to spread.

EXPLOSION: Combustible vapors, which are heavier than air, can accumulate in low areas and spread along the ground or floor to points away from the site of the liquid.

FIRE EXTINGUISHING MEDIA: Dry chemical, foam or carbon dioxide (CO₂).

SPECIAL INFORMATION: Avoid potential ignition sources such as open flames, electric arcs, hot surfaces and sources of sparks.

SECTION V: REACTIVITY DATA

STABILITY: Stable.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide and carbon dioxide.

HAZARDOUS POLYMERIZATION: Will not occur.

INCOMPATIBILITIES: Strong acids, alkalies and oxidizers such as oxygen and chlorine.
SECTION VI: HEALTH HAZARD INFORMATION

A. EXPOSURE ROUTE AND HEALTH EFFECTS

Exposure to mineral oil mist at airborne concentrations above the Threshold Limit Value may cause irritation of the upper respiratory tract.

INGESTION: May cause vomiting. If swallowed, may be aspirated into lungs, causing pulmonary edema and chemical pneumonitis.

SKIN CONTACT: Irritating to the skin. May cause skin disorders including dermatitis, oil acne and folliculitis.

EYE CONTACT: Irritating to the eyes.

CHRONIC EXPOSURE: Prolonged or repeated overexposure to mineral oil mist may cause pulmonary effects. In the liquid state, skin disorders, as noted above, are the most commonly reported effects.

AGGRAVATION OF PREEXISTING CONDITIONS: Consult a physician prior to assigning workers with respiratory or skin disorders to tasks requiring the use of mineral oil.

B. FIRST AID

INHALATION: Move person to fresh air. Administer oxygen if person experiences difficulty in breathing.

INGESTION: Immediately contact local poison control center.

SKIN CONTACT: Remove contaminated clothing, then flush skin with water for at least 15 minutes. Wash clothing thoroughly, and separately, before re-use.

EYE CONTACT: Flush with water for at least 15 minutes, occasionally lifting upper and lower eyelids.

IF IRRITATION CONTINUES, GET MEDICAL ATTENTION IMMEDIATELY.

C. TOXICITY DATA:

RTECS NUMBER: PY8030000

TOXICITY DATA: LD50 oral (mouse): 22 g/kg
SECTION VII: SPILL/LEAK AND DISPOSAL INFORMATION

SPILLS: Block entry to sewers, streams, rivers and bodies of water. Absorb with dry inert material. Transfer to disposal drums.

DISPOSAL: Comply with all Federal, state and local regulations.

SECTION VIII: SPECIAL PROTECTION INFORMATION

AIRBORNE EXPOSURE LIMITS:

<table>
<thead>
<tr>
<th>SUBSTANCE</th>
<th>THRESHOLD LIMIT VALUE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oil mist, mineral</td>
<td>5 mg/m³ TWA (ACGIH)</td>
</tr>
<tr>
<td></td>
<td>10 mg/m³ STEL (ACGIH)</td>
</tr>
<tr>
<td></td>
<td>5 mg/m³ TWA (OSHA)</td>
</tr>
</tbody>
</table>

VENTILATION SYSTEM: Laboratory hood or local exhaust.

RESPIRATORS: NIOSH/MSHA approved.

SKIN PROTECTION: Chemical resistant clothing and gloves.

EYE PROTECTION: Chemical resistant goggles and face shield.

SECTION IX: SPECIAL PRECAUTIONS

Keep container tightly sealed.

Store in a cool, dry well-ventilated area, away from potential sources of ignition.
The information and recommendations presented herein are based on sources believed reliable as of the date hereof and relate only to the specific material designated. PERKIN ELMER LLC makes no representations as to the completeness or accuracy thereof. It is intended only for use by persons having technical skills and at their own discretion and risk. It is the user's responsibility for the product's safe use, the product's suitability for the intended use, and the product's safe disposal. PERKIN ELMER LLC neither assumes or authorizes any other person to assume for it, the use of, or reliance upon, this information. NO REPRESENTATIONS OR WARRANTIES, EITHER EXPRESSED OR IMPLIED, OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR OF ANY OTHER NATURE ARE MADE HEREAUNDER WITH RESPECT TO THE INFORMATION SET FORTH HEREIN OR TO THE PRODUCT TO WHICH THE INFORMATION REFERS.
1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: AUTOMATIC TRANSMISSION FLUID
SUPPLIER: EXXONMOBIL CORPORATION
3225 GALLOWS RD.
FAIRFAX, VA  22037
24 - Hour Health and Safety Emergency (call collect):  609-737-4411
24 - Hour Transportation Emergency (Primary) CHEMTREC: 800-424-9300
          (Secondary) 281-834-3296

Product and Technical Information:
Lubricants and Specialties:  800-662-4525  800-443-9966
Fuels Products:  800-947-9147
MSDS Fax on Demand: 613-228-1467
MSDS Internet Website: http://emmsds.ihssolutions.com/

2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAMES AND SYNONYMS: SEVERE TREAT MIN. OILS & ADDITIVES
GLOBALLY REPORTABLE MSDS INGREDIENTS:
None.
See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

Under normal conditions of use, this product is not considered hazardous
according to regulatory guidelines (See section 15).
EMERGENCY OVERVIEW: Red Liquid.  DOT ERG No. : NA
POTENTIAL HEALTH EFFECTS: Under normal conditions of intended use,
this product does not pose a risk to health.  Excessive exposure
may result in eye, skin or respiratory irritation.
For further health effects/toxicological data, see Section 11.
4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.
SKIN CONTACT: Wash contact areas with soap and water. Remove and clean oil soaked clothing daily and wash affected area. (See Section 16 - Injection Injury)
INHALATION: Not expected to be a problem. However, if respiratory irritation, dizziness, nausea, or unconsciousness occurs due to excessive vapor or mist exposure, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or mouth-to-mouth resuscitation.
INGESTION: Not expected to be a problem. Seek medical attention if discomfort occurs. Do not induce vomiting.

5. FIRE-FIGHTING MEASURES

EXTINQUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.
SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.
SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.
UNUSUAL FIRE AND EXPLOSION HAZARDS: None.
COMBUSTION PRODUCTS: Fumes, smoke, carbon monoxide, sulfur oxides, aldehydes and other decomposition products, in the case of incomplete combustion.
Flash Point C(F): > 177(350) (ASTM D-92).
Flammable Limits (approx.% vol.in air) - LEL: 0.9%,UEL: 7.0%
NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills/releases as required to appropriate authorities. U.S. Coast Guard and EPA regulations require immediate reporting of spills/releases that could reach any waterway including intermittent dry creeks. Report spill/release to Coast Guard National Response Center toll free
number (800)424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:
LAND SPILL: Shut off source taking normal safety precautions. Take measures to minimize the effects on ground water. Recover by pumping or contain spilled material with sand or other suitable absorbent and remove mechanically into containers. If necessary, dispose of adsorbed residues as directed in Section 13.
WATER SPILL: Confine the spill immediately with booms. Warn other ships in the vicinity. Notify port and other relevant authorities. Remove from the surface by skimming or with suitable absorbents. If permitted by regulatory authorities the use of suitable dispersants should be considered where recommended in local oil spill procedures.

ENVIRONMENTAL PRECAUTIONS: Prevent material from entering sewers, water sources or low lying areas; advise the relevant authorities if it has, or if it contaminates soil/vegetation.

PERSONAL PRECAUTIONS: See Section 8

7. HANDLING AND STORAGE

HANDLING: No special precautions are necessary beyond normal good hygiene practices. See Section 8 for additional personal protection advice when handling this product.

STORAGE: Keep containers closed when not in use. Do not store in open or unlabelled containers. Store away from strong oxidizing agents and combustible materials. Do not store near heat, sparks, flame or strong oxidants.

SPECIAL PRECAUTIONS: Prevent small spills and leakages to avoid slip hazard.

EMPTY CONTAINER WARNING: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to refill or clean container since residue is difficult to remove. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

8. EXPOSURE CONTROLS/PERSOANL PROTECTION
OCCUPATIONAL EXPOSURE LIMITS:
When mists/aerosols can occur, the following are recommended: 5 mg/m³
(as oil mist) - ACGIH Threshold Limit Value (TLV), 10 mg/m³ (as oil mist)
- ACGIH Short Term Exposure Limit (STEL), 5 mg/m³ (as oil mist) - OSHA
Permissible Exposure Limit (PEL)
VENTILATION: If mists are generated, use adequate ventilation, local
exhaust or enclosures to control below exposure limits.
RESPIRATORY PROTECTION: If mists are generated, and/or when
ventilation is not adequate, wear approved respirator.
EYE PROTECTION: If eye contact is likely, safety glasses with side
shields or chemical type goggles should be worn.
SKIN PROTECTION: Not normally required. When splashing or liquid
contact can occur frequently, wear oil resistant gloves and/or
other protective clothing. Good personal hygiene practices
should always be followed.

9. PHYSICAL AND CHEMICAL PROPERTIES

Typical physical properties are given below. Consult Product Data Sheet
for specific details.
APPEARANCE: Liquid
COLOR: Red
ODOR: Mild
ODOR THRESHOLD-ppm: NE
pH: NA
BOILING POINT C(F): > 316(600)
MELTING POINT C(F): NA
FLASH POINT C(F): > 177(350) (ASTM D-92)
FLAMMABILITY (solids): NE
AUTO FLAMMABILITY C(F): NA
EXPLOSIVE PROPERTIES: NA
OXIDIZING PROPERTIES: NA
VAPOR PRESSURE-mmHg 20 C: < 0.1
VAPOR DENSITY: > 2.0
EVAPORATION RATE: NE
RELATIVE DENSITY, 15/4 C: 0.869
SOLUBILITY IN WATER: Negligible
PARTITION COEFFICIENT: > 3.5
VISCOSITY AT 40 C, cSt: 38.0
VISCOSITY AT 100 C, cSt: 7.5
POUR POINT C(F): < -45(-49)
FREEZING POINT C(F): NE
VOC: < 8.00 (Wt. %); 0.574 lbs/gal
DMSO EXTRACT, IP-346 (Wt.%): <3, for mineral oil only
NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES
10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.
CONDITIONS TO AVOID: Extreme heat and high energy sources of ignition.
INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers.
HAZARDOUS DECOMPOSITION PRODUCTS: Product does not decompose at ambient temperatures.
HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL DATA

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Practically non-toxic (LC50: greater than 5 mg/l). ---Based on testing of similar products and/or the components.

EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

OTHER ACUTE TOXICITY DATA: Although an acute inhalation study was not performed with this product, a variety of mineral and synthetic oils, such as those in this product, have been tested. These samples had virtually no effect other than a nonspecific inflammatory response in the lung to the aerosolized mineral oil. The presence of additives in other tested formulations (in approximately the same amounts as in the present formulation) did not alter the observed effects.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

No significant adverse effects were found in studies using repeated dermal applications of similar formulations to the skin of laboratory animals for 13 weeks at doses significantly higher than those expected during normal industrial exposure. The animals were evaluated extensively for effects of exposure
(hematology, serum chemistry, urinalysis, organ weights, microscopic examination of tissues etc.).

---REPRODUCTIVE TOXICOLOGY (SUMMARY)---

No teratogenic effects would be expected from dermal exposure, based on laboratory developmental toxicity studies of major components in this formulation and/or materials of similar composition.

---CHRONIC TOXICOLOGY (SUMMARY)---

Repeated and/or prolonged exposure may cause irritation to the skin, eyes or respiratory tract. Overexposure to oil mist may result in oil droplet deposition and/or granuloma formation. For mineral base oils: Base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of severely treated oils showed no evidence of carcinogenic effects. These results are confirmed on a continuing basis using various screening methods such as Modified Ames Test, IP-346, and/or other analytical methods. For synthetic base oils: The base oils in this product have been tested in the Ames assay and other tests of mutagenicity with negative results. These base oils are not expected to be carcinogenic with chronic dermal exposures.

---SENSITIZATION (SUMMARY)---

Not expected to be sensitizing based on tests of this product, components, or similar products.

--- ECOLOGICAL INFORMATION ---

ENVIRONMENTAL FATE AND EFFECTS: In the absence of specific environmental data for this product, this assessment is based on information for representative products. ECOTOXICITY: Available ectoxicity data (LL50 >1000 mg/L) indicates that adverse effects to aquatic organisms are not expected from this product. MOBILITY: When released into the environment, adsorption to sediment and soil will be the predominant behavior. PERSISTENCE AND DEGRADABILITY: This product is expected to be inherently biodegradable. BIOACCUMULATIVE POTENTIAL: Bioaccumulation is unlikely due to the very low water solubility of this product, therefore bioavailability to aquatic organisms is minimal.

--- DISPOSAL CONSIDERATIONS ---

WASTE DISPOSAL: Product is suitable for burning in an enclosed,
controlled burner for fuel value. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at an appropriate government waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity. The unused product is not formulated with substances covered by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

14. TRANSPORT INFORMATION

USA DOT: NOT REGULATED BY USA DOT.
RID/ADR: NOT REGULATED BY RID/ADR.
IMO: NOT REGULATED BY IMO.
IATA: NOT REGULATED BY IATA.
STATIC ACCUMULATOR (50 picosiemens or less): YES

15. REGULATORY INFORMATION

US OSHA HAZARD COMMUNICATION STANDARD: When used for its intended purposes, this product is not classified as hazardous in accordance with OSHA 29 CFR 1910.1200.
EU Labeling: Product is not dangerous as defined by the European Union Dangerous Substances/Preparations Directives. EU labeling not required.
Governmental Inventory Status: All components comply with TSCA, EINECS/ELINCS and AICS.
U.S. Superfund Amendments and Reauthorization Act (SARA) Title III: This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".
SARA (311/312) REPORTABLE HAZARD CATEGORIES: None.
This product contains no chemicals subject to the supplier notification requirements of SARA (313) toxic release program.
The following product ingredients are cited on the lists below:

<table>
<thead>
<tr>
<th>CHEMICAL NAME</th>
<th>CAS NUMBER</th>
<th>LIST CITATIONS</th>
</tr>
</thead>
</table>

NAPHTHALENE (COMPONENT ANALYSIS) 91-20-3 16
TOLUENE (COMPONENT ANALYSIS) 108-88-3 22
(0.09%) DIPHENYLAMINE 122-39-4 1

--- REGULATORY LISTS SEARCHED ---
1=ACGIH ALL 6=IARC 1 11=TSCA 4 16=CA P65 CARC 21=LA RTK
2=ACGIH A1 7=IARC 2A 12=TSCA 5a2 17=CA P65 REPRO 22=MJ 293
3=ACGIH A2 8=IARC 2B 13=TSCA 5e 18=CA RTK 23=MN RTK
4=NTP CARC 9=OSHA CARC 14=TSCA 6 19=FL RTK 24=NJ RTK
5=NTP SUS 10=OSHA Z 15=TSCA 12b 20=IL RTK 25=PA RTK
26=RI RTK

Code key: CARC=Carcinogen; SUS=Suspected Carcinogen; REPRO=Reproductive

16. OTHER INFORMATION

USE: AUTOMATIC TRANSMISSION FLUID
NOTE: PRODUCTS OF EXXON MOBIL CORPORATION AND ITS AFFILIATED COMPANIES ARE NOT FORMULATED TO CONTAIN PCBS.

Health studies have shown that many hydrocarbons pose potential human health risks which may vary from person to person. Information provided on this MSDS reflects intended use. This product should not be used for other applications. In any case, the following advice should be considered:

INJECTION INJURY WARNING: If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

INDUSTRIAL LABEL

Under normal conditions of intended use, this product does not pose a risk to health. Excessive exposure may result in eye, skin or respiratory irritation. Always observe good hygiene measures. First Aid: Wash skin with soap and water. Flush eyes with water. If overcome by fumes or vapor, remove to fresh air. If ingested do not induce vomiting. If symptoms persist seek medical assistance. Read and understand the MSDS before using this product.

Precautionary Label Text:
This warning is given to comply with California Health and Safety Code 25249.6 and does not constitute an admission or a waiver of rights. This product contains a chemical known to the State of California to cause cancer.

******************************************************************************
For Internal Use Only: MHC: 1* 1* 1* 1* 1*, MPPEC: A, TRN: 566158-00,
Legally required information is given in accordance with applicable Information given herein is offered in good faith as accurate, but without guarantee. Conditions of use and suitability of the product for particular uses are beyond our control; all risks of use of the product are therefore assumed by the user and WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. Nothing is intended as a recommendation for uses which infringe valid patents or as extending any license under valid patents. Appropriate warnings and safe handling procedures should be provided to handlers and users. Use or retransmission of the information contained herein in any other format than the format as presented is strictly prohibited. Mobil neither represents nor warrants that the format, content or product formulas contained in this document comply with the laws of any other country except the United States of America.

Copyright 1996 Mobil Corporation, All rights reserved
1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: DIESEL #2, OFF ROAD (LOW SULFUR)
SUPPLIER: EXXONMOBIL OIL CORPORATION
3225 GALLows RD.
FAIRFAX, VA 22037
24 - Hour Health and Safety Emergency (call collect): 609-737-4411
24 - Hour Transportation Emergency (Primary) CHEMTRBC: 800-424-9300
(Secondary) 281-834-3296
Product and Technical Information: 800-662-4525 703-846-6693
MSDS Fax on Demand: 613-228-1467, other MSDS information: 856-224-4644

2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAMES AND SYNONYMS: HYDROCARBONS AND ADDITIVES
GLOBALLY REPORTABLE MSDS INGREDIENTS:

<table>
<thead>
<tr>
<th>Substance Name</th>
<th>Approx. Wt%</th>
</tr>
</thead>
<tbody>
<tr>
<td>DIESEL FUEL (68334-30-5)</td>
<td>95-100</td>
</tr>
<tr>
<td>COMPONENT(S) OF PRODUCT INGREDIENTS INCLUDE: ETHYL BENZENE (100-41-4)</td>
<td>0.5</td>
</tr>
</tbody>
</table>

NOTE: Composition may contain up to 0.5% performance additive.
See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

This product is considered hazardous according to regulatory guidelines (See Section 15).
EMERGENCY OVERVIEW: Red Liquid. Material is combustible. Liquid can release vapors that readily form flammable mixtures at or above the flash point. Product can accumulate a static charge which may cause a fire or explosion. DOT ERG No. : 128
POTENTIAL HEALTH EFFECTS: Respiratory irritation, dizziness, nausea, loss of consciousness, and in cases of extreme exposure, possibly death. Diesel exhaust may cause lung cancer. Prolonged, repeated skin contact may result in skin irritation or more serious skin disorders. Low viscosity material-if swallowed may enter the lungs and cause lung damage. Note: This product contains polycyclic aromatic hydrocarbons, some of which have been reported to cause skin cancer in test animals and in humans under conditions of poor personal hygiene and prolonged repeated contact.

For further health effects/toxicological data, see Section 11.

4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.

SKIN CONTACT: Remove contaminated clothing. Dry wipe exposed skin and cleanse yourself with waterless hand cleaner and follow by washing thoroughly with soap and water. For those providing assistance, avoid further contact to yourself or others. Wear impervious gloves. Launder contaminated clothing separately before reuse. Discard contaminated articles that cannot be laundered. (See Section 16 - Injection Injury)

INHALATION: Remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with mechanical device or use mouth-to-mouth resuscitation.

INGESTION: Seek immediate medical attention. Do not induce vomiting.

NOTE TO PHYSICIANS: Material if aspirated into the lungs may cause chemical pneumonitis. PRE-EXISTING MEDICAL CONDITIONS WHICH MAY BE AGGRAVATED BY EXPOSURE: Hydrocarbon Solvents/Petroleum Hydrocarbons- Skin contact may aggravate an existing dermatitis.

5. FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.

SPECIAL FIRE FIGHTING PROCEDURES: Water may be ineffective, but water should be used to keep fire-exposed containers cool. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Material is combustible. Liquid
can release vapors that readily form flammable mixtures at or above the flash point. Product can accumulate a static charge which may cause a fire or explosion.

COMBUSTION PRODUCTS: Fumes, smoke, carbon monoxide, sulfur oxides, aldehydes and other decomposition products, in the case of incomplete combustion.

Flash Point C(F): > 55(131) (ASTM D-93).

Flammable Limits (approx.% vol.in air) - LEL: 0.6%, UEL: 7.0%

NFPA HAZARD ID: Health: 1, Flammability: 2, Reactivity: 0

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills/releases as required to appropriate authorities. U.S. Coast Guard and EPA regulations require immediate reporting of spills/releases that could reach any waterway including intermittent dry creeks. Report spill/release to Coast Guard National Response Center toll free number (800)424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:

LAND SPILL: Eliminate sources of ignition. Shut off source taking normal safety precautions. Take measures to minimize the effects on ground water. Recover by pumping using explosion-proof equipment or contain spilled liquid with sand or other suitable absorbent and remove mechanically into containers. If necessary, dispose of adsorbed residues as directed in Section 13.

WATER SPILL: Eliminate sources of ignition and warn other ships in the vicinity to stay clear. Notify port and other relevant authorities. Confine with booms if skimming equipment is available to recover the spill. Otherwise disperse in unconfined waters, if permitted by local authorities and environmental agencies. If permitted by regulatory authorities the use of suitable dispersants should be considered where recommended in local oil spill procedures.

ENVIRONMENTAL PRECAUTIONS: Prevent material from entering sewers, water sources or low lying areas; advise the relevant authorities if it has, or if it contaminates soil/vegetation.

PERSONAL PRECAUTIONS: See Section 8

7. HANDLING AND STORAGE

HANDLING: Keep product away from high energy ignition sources, heat, sparks, pilot lights, static electricity, and open flame.
Harmful in contact with or if absorbed through the skin. Avoid inhalation of vapors or mists. Use in well ventilated area away from all ignition sources. See Section 8 for additional personal protection advice when handling this product. PORTABLE CONTAINERS approved for storing fuel must be placed on the ground and the nozzle must stay in contact with the container when filling to prevent build up and discharge of static electricity.

STORAGE: Store in a cool area. Avoid sparking conditions. Ground and bond all transfer equipment.

SPECIAL PRECAUTIONS: To prevent and minimize fire or explosion risk from static accumulation and discharge, effectively bond and/or ground product transfer system. Do not use electronic devices (including but not limited to cellular phones, computers, calculators, pagers, etc.) in or around any fueling operation or storage area unless the devices are certified intrinsically safe by an approved national testing agency and to the safety standards required by national and/or local laws and regulations. Electrical equipment and fittings must comply with local fire prevention regulations for this class of product. Use the correct grounding procedures. Refer to national or local regulations covering safety at petroleum handling and storage areas for this product.

EMPTY CONTAINER WARNING: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to refill or clean container since residue is difficult to remove. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

---8. EXPOSURE CONTROLS/PERSONAL PROTECTION---

OCCUPATIONAL EXPOSURE LIMITS:
ExxonMobil recommends an 8-hour time-weighted average (TWA) exposure of 500 mg/m³ total vapor/aerosol (approx. 100 ppm vapor) or 5 mg/m³ stable aerosols.

<table>
<thead>
<tr>
<th>Substance Name (CAS-No.)</th>
<th>Source</th>
<th>TWA ppm</th>
<th>STEL ppm</th>
</tr>
</thead>
<tbody>
<tr>
<td>ETHYL BENZENE (100-41-4)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OSHA</td>
<td>100</td>
<td>125</td>
</tr>
<tr>
<td></td>
<td>ACGIH</td>
<td>100</td>
<td>125</td>
</tr>
</tbody>
</table>
NOTE: Limits shown for guidance only. Follow applicable regulations.
VENTILATION: Use in well ventilated area with local exhaust ventilation. Ventilation equipment must be explosion proof. Use away from all ignition sources.
RESPIRATORY PROTECTION: Approved respiratory equipment must be used when airborne concentrations are unknown or exceed the recommended exposure limit. Self-contained breathing apparatus may be required for use in confined or enclosed spaces.
EYE PROTECTION: If splash with liquid is possible, chemical type goggles should be worn.
SKIN PROTECTION: Impervious gloves must be worn. If contact is likely oil impervious clothing must be worn. Good personal hygiene practices should always be followed.

9. PHYSICAL AND CHEMICAL PROPERTIES

Typical physical properties are given below. Consult Product Data Sheet for specific details.
APPEARANCE: Liquid
COLOR: Red
ODOR: Hydrocarbon
ODOR THRESHOLD-ppm: NE
pH: NA
BOILING POINT C(F): > 149(300)
MELTING POINT C(F): NA
FLASH POINT C(F): > 55(131) (ASTM D-93)
FLAMMABILITY (solids): NE
AUTO FLAMMABILITY: NE
EXPLOSIVE PROPERTIES: NA
OXIDIZING PROPERTIES: NA
VAPOR PRESSURE-mmHg 20 C: 0.5
VAPOR DENSITY: > 2.0
EVAPORATION RATE: NE
RELATIVE DENSITY, 15/4 C: 0.82-0.87
SOLUBILITY IN WATER: Negligible
PARTITION COEFFICIENT: > 3.5
VISCOSITY AT 40 C, cSt: > 1.0
VISCOSITY AT 100 C, cSt: NE
POUR POINT C(F): < -7(20)
FREEZING POINT C(F): NE
VOLATILE ORGANIC COMPOUND: NE
DMSO EXTRACT, IP-346 (WT.%): NA

NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES
FOR FURTHER TECHNICAL INFORMATION, CONTACT YOUR MARKETING REPRESENTATIVE
10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.
CONDITIONS TO AVOID: Extreme heat and high energy sources of ignition.
INCOMPATIBILITY (MATERIALS TO AVOID): Halogens, strong acids, alcalies, and oxidizers.
HAZARDOUS DECOMPOSITION PRODUCTS: Product does not decompose at ambient temperatures.
HAZARDOUS POLYMERIZATION: Will not occur.

11. TOXICOLOGICAL DATA

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Practically non-toxic (LC50: greater than 5 mg/l). ---Based on testing of similar products and/or the components.

EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

Repeated dermal application of middle distillates, heating oils and diesel oils to rabbits for 2-4 weeks at up to 1 gm/kg resulted in strong to severe skin irritation with some weight loss at the higher dose. Toxic effects ranging from weight loss to mortality was observed in rabbits treated repeatedly with very high doses (6 gm/kg) of these oils. Repeated inhalation exposure of middle distillate and diesel vapor and aerosol to rats for 2-4 weeks at up to 6 mg/l resulted in respiratory tract irritation, lung changes/infiltration/accumulation, and some reduction in lung function.

---REPRODUCTIVE TOXICOLOGY (SUMMARY)---

Diesel fuel vapors were tested in an inhalation teratology (developmental toxicity) study in rats and when only minimal maternal toxicity was observed, no fetotoxic or developmental effects were observed. A developmental toxicity study of
Dermally applied middle distillates did indicate fetotoxicity (reduced litter size, litter weight, increased resorptions) at doses that also caused significant maternal toxicity.

---CHRONIC TOXICOLOGY (SUMMARY)---

Diesel fuel, heating oil and middle distillates have been shown to be carcinogenic in lifetime mouse skin painting bioassays. While in some cases, the tumor incidence is low in the test populations and possibly associated with skin irritation, concurrent evidence from short-term predicative tests (Modified Ames) does indicate some level of mutagenic activity associated with levels of polycyclic aromatic compounds in certain test samples.

---SENSITIZATION (SUMMARY)---

Middle distillate oils were not skin sensitizers when tested in a Modified Buehler Guinea Pig Sensitization Assay.

---OTHER TOXICOLOGY DATA---

Overexposure to diesel exhaust fumes may result in eye irritation, headaches, nausea, and respiratory irritation. Animal studies involving lifetime exposure to high levels of diesel exhaust have produced variable results, with some studies indicating a potential for lung cancer. Limited evidence from epidemiological studies suggest an association between long-term occupational exposure to diesel engine emissions and lung cancer. Diesel engine exhaust typically consists of gases and particulates, including carbon dioxide, carbon monoxide, nitrogen compounds, oxides of sulfur, and hydrocarbons. Diesel exhaust composition will vary with fuel, engine type, load cycle, engine maintenance, tuning and exhaust gas treatment. Use of adequate ventilation and/or respiratory protection in the presence of diesel exhaust is recommended to minimize exposures. This product contains ethylbenzene. The International Agency for Research on Cancer (IARC) has evaluated ethylbenzene and classified it as possibly carcinogenic to humans (Group 2B) based on sufficient evidence for carcinogenicity in experimental animals, but inadequate evidence for cancer in exposed humans.

12. ECOLOGICAL INFORMATION

ENVIRONMENTAL FATE AND EFFECTS:
In the absence of specific environmental data for this product, this assessment is based on information for representative substances. When released into the environment, some of the constituents of diesel fuels/heating oil will volatilize and be photodegraded in the atmosphere. The less volatile, more water-soluble components which are aromatic hydrocarbons will also undergo aqueous photodegradation. Dissolution of the higher
molecular weight hydrocarbon components in water will be limited, but losses through sediment adsorption may be significant. Based on test results for similar products, this substance may be toxic to aquatic organisms such as algae and daphnia (EL50/IRL50 =1-10 mg/L). This substance has also been shown to be toxic to specific fish species (LL50 = 1-10 mg/L for rainbow trout, Atlantic silverside). The majority of the components in this product would be expected to be inherently biodegradable.

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL: Product is suitable for burning for fuel value in compliance with applicable laws and regulations.

RCRA INFORMATION: Disposal of unused product may be subject to RCRA regulations (40 CFR 261). Disposal of the used product may also be regulated due to ignitability, corrosivity, reactivity, or toxicity as determined by the Toxicity Characteristic Leaching Procedure (TCLP).

FLASH: > 55(131) C(F)

14. TRANSPORT INFORMATION

NOTE: The flash point of this material is > 131F. Regulatory classifications vary as follows:

DOT: Flammable Liquid OR Combustible Liquid - (49CFR 173.120(b)(2))
OSHA: Combustible Liquid
IATA/IMO: Flammable Liquid

USA DOT:

SHIPPING NAME: Diesel Fuel
HAZARD CLASS & DIV: COMBUSTIBLE LIQUID
ID NUMBER: NA1993
ERG NUMBER: 128
PACKING GROUP: PG III
STCC: NE
DANGEROUS WHEN WET: No
POISON: No
LABEL(s): NA
PLACARD(s): Combustible
PRODUCT RQ: NA
MARPOL III STATUS: NA

RID/ADR:
HAZARD CLASS: 3
HAZARD SUB-CLASS: 31(c)
LABEL: 3
DANGER NUMBER: 30
UN NUMBER: 1202
SHIPPING NAME: Gas Oil
REMARKS: NA
IMO:
HAZARD CLASS & DIV: 3.3
UN NUMBER: 1202
PACKING GROUP: PG III
SHIPPING NAME: Gas Oil
LABEL(s): Flammable Liquid
MARPOL III STATUS: NA
ICAO/IATA:
HAZARD CLASS & DIV: 3
ID/UN Number: 1202
PACKING GROUP: PG III
SHIPPING NAME: Gas Oil
SUBSIDIARY RISK: NA
LABEL(s): Flammable Liquid
STATIC ACCUMULATOR (50 picosiemens or less): YES

15. REGULATORY INFORMATION

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined to be hazardous.
EU Labeling: Product is dangerous as defined by the European Union Dangerous Substances/Preparations Directives.
Symbol: Xn Harmful.
Risk Phrase(s): R40-65-66.
Possible risks of irreversible effects. Harmful: may cause lung damage if swallowed. Repeated exposure may cause skin dryness or cracking.
Avoid contact with skin. Keep out of the reach of children. Wear suitable protective clothing and gloves. Avoid release to the environment. Refer to special instructions/Safety data sheets. If swallowed, do not induce vomiting: seek medical advice immediately and show this container or label.
Contains: Gas oil - unspecified.
Governmental Inventory Status: All components comply with TSCA,
EINECS/ELINCS, AICS, METI, DSL, KORBA, and PHILIPPINES.
U.S. Superfund Amendments and Reauthorization Act (SARA) Title III: This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".
SARA (311/312) REPORTABLE HAZARD CATEGORIES:
FIRE CHRONIC ACUTE
This product contains the following SARA (313) Toxic Release
Chemicals:

<table>
<thead>
<tr>
<th>CHEMICAL NAME</th>
<th>CAS NUMBER</th>
<th>CONC.</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLYNUCLEAR AROMATIC HYDROCARBONS (COMPONENT ANALYSIS)</td>
<td></td>
<td>0.1%</td>
</tr>
</tbody>
</table>

The following product ingredients are cited on the lists below:

<table>
<thead>
<tr>
<th>CHEMICAL NAME</th>
<th>CAS NUMBER</th>
<th>LIST CITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAPHTHALENE (COMPONENT ANALYSIS)</td>
<td>91-20-3</td>
<td>22</td>
</tr>
<tr>
<td>Ethyl Benzene (COMPONENT ANALYSIS)</td>
<td>100-41-4</td>
<td>1, 8</td>
</tr>
<tr>
<td>Diesel Oil...C9-20</td>
<td>68334-30-5</td>
<td>21, 26</td>
</tr>
</tbody>
</table>

--- REGULATORY LISTS SEARCHED ---

1=ACGIH ALL 6=IARC 1 11=TSCA 4 16=CA P65 CARC 21=LA RTK
2=ACGIH A1 7=IARC 2A 12=TSCA 5a2 17=CA P65 REPRO 22=MI 293
3=ACGIH A2 8=IARC 2B 13=TSCA 5e 18=CA RTK 23=MN RTK
4=NTP CARC 9=OSHA CARC 14=TSCA 6 19=FL RTK 24=NJ RTK
5=NTP SUS 10=OSHA Z 15=TSCA 12b 20=IL RTK 25=PA RTK
26=RI RTK

Code key: CARC=Carcinogen; SUS=Suspected Carcinogen; REPRO=Reproductive

16. OTHER INFORMATION

USE: DIESEL FUEL
NOTE: PRODUCTS OF EXXON MOBIL CORPORATION AND ITS AFFILIATED COMPANIES ARE NOT FORMULATED TO CONTAIN PCBs.

Health studies have shown that many hydrocarbons pose potential human health risks which may vary from person to person. Information provided on this MSDS reflects intended use. This product should not be used for other applications. In any case, the following advice should be considered:

INJECTION INJURY WARNING: If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

Precautionary Label Text:
CONTAINS DIESEL OIL... C9-20
WARNING!
COMBUSTIBLE LIQUID AND VAPOR. RESPIRATORY IRRITATION, DIZZINESS, NAUSEA, LOSS OF CONSCIOUSNESS, AND IN CASES OF EXTREME EXPOSURE, POSSIBLY DEATH. LOW VISCOSITY MATERIAL-IF SWALLOWED, MAY BE ASPIRATED AND CAN CAUSE SERIOUS OR FATAL LUNG DAMAGE.
MAY CAUSE SKIN CANCER ON PROLONGED, REPEATED SKIN CONTACT. ANIMAL SKIN ABSORPTION STUDIES RESULTED IN INCREASED MORTALITY, EFFECTS ON BODY WEIGHT, THE IMMUNE SYSTEM AND THE UNBORN CHILD. PROLONGED, REPEATED SKIN CONTACT MAY CAUSE IRRITATION. DIESEL EXHAUST MAY CAUSE LUNG CANCER. Keep away from heat and flame. Avoid prolonged or repeated overexposure by skin contact or inhalation. Use with adequate ventilation. Keep container closed. Keep out of reach of children.

FIRST AID: If inhaled, remove from further exposure. If respiratory irritation, dizziness, nausea, or unconsciousness occurs, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or use mouth-to-mouth resuscitation. In case of contact, remove contaminated clothing. Dry wipe the exposed skin and cleanse with waterless hand cleaner and follow by washing thoroughly with soap and water. For those providing assistance, avoid further skin contact to yourself and others. Wear impervious gloves. If swallowed, seek immediate medical attention. Do not induce vomiting. Only induce vomiting at the instruction of a physician.

This warning is given to comply with California Health and Safety Code 25249.6 and does not constitute an admission or a waiver of rights. This product contains a chemical known to the State of California to cause cancer, birth defects, or other reproductive harm. Chemicals known to the State of California to cause cancer, birth defects, or other reproductive harm are created by the combustion of this product. Refer to product Material Safety Data Sheet for further safety and health information.

*******************************************************************************
*******************************************************************************

*******************************************************************************
Legally required information is given in accordance with applicable Information given herein is offered in good faith as accurate, but without guarantee. Conditions of use and suitability of the product for particular uses are beyond our control; all risks of use of the product are therefore assumed by the user and WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. Nothing is intended as a recommendation for uses which infringe valid patents or as extending any license under valid patents. Appropriate warnings and safe handling procedures should be provided to handlers and users. Use or re-transmission of the information contained herein in any other format than the format as presented is strictly prohibited. Mobil neither represents nor warrants that the format, content or product formulas contained in this document comply with the laws of any other country.
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Appendix B

Spill Incident Report Form
Green Mountain Power Corporation
Oil Spill Response Report

Date: / / / Time: _________ am/pm District:____________

Town:____________________________ Plant/Road Name:____________

Exact Location of spill (e.g. pole, pad, s/s#)__________________________

Equipment Type: ____________________________ ID#________________ TF Size:_______ kVA
(Co. #, Serial #, Truck #, etc.)

On or near water: yes__ no __ if yes, name body of water____________________________________

Type of product spilled: __________________ Amount of product:__________________________

PCB-level: o Non-PCB o < 50 PPM PCB o > 50 PPM PCB o > 500 PPM PCB

Cause of spill: ________________________________________________________________

Describe Clean-up procedures: ___________________________________________________

Amount of recovered materials:
Drums containing ____________________________
Drums containing ____________________________
Drums containing ____________________________

Location and method of spill debris disposal: ____________________________

Name and Address of persons, firms affected by spill:
1) ____________________________________________________________
2) ____________________________________________________________
3) Name of Outside Services Used (if any): ____________________________

Spill Reporting:
1) Spill responder reported spill to GMP Control Center
   Time:___________ am/pm Person Contacted: _______________________________________

2) Control Center reported spill to GMP Spill Response Coordinator: Date __________
   Time:_____________ am/pm Person Contacted: J. Soter, D. Lothrop, B. Wilcox, or Al Richer

3) Spill Response Coordinator reported spill to Vermont Environmental Agency: Date ______
   Time:______________ am/pm Person Contacted: Phone (802.241.3888) (800.641.5005)

4) Spill reported to National Response Center (NRC) Date: __________
   Time __________ am/pm Person Contacted: Phone (800.424.8802)

GMP Supervisor in charge of response (signature): __________________________

Field Staff involved in cleanup (Names): __________________________________

Submit this report to Environmental, Health & Safety Manager within 24 hours of incident.
Appendix C

Spill Response Call List
GREEN MOUNTAIN POWER CORPORATION
SPILL RESPONSE PROCEDURES

SPILL EVENT: The loss of oil from electrical equipment, bulk fuel storage equipment, vehicles, etc. to the ground surface, waterways, wetlands, etc.
The State of Vermont shall be notified for all spills greater than 2 gallons.
The National Response Center shall be notified for all spills to waterways or wetlands.

Spill Responder evaluates spill. Spill responder evaluates human safety, volume and type of material spilled (PCB containing), and whether the spill is approaching/within a waterway.

Spill Responder secures the spill site. Turn off all pumps and engines, and eliminate all sources of ignition. Isolate the spill area with a caution tape perimeter as appropriate.

Spill Responder contains the spill. Safely take defensive measures to contain the spill with sorbent booms, pads, fiberperl and/or granular sorbents.

Spill Responder notifies GMP Control Center of the spill.

GMP Control Center (802) 655-4411

Control Center notifies an Emergency Spill Response Coordinator (ESRC):

<table>
<thead>
<tr>
<th>NAME</th>
<th>OFFICE</th>
<th>PAGER</th>
<th>HOME</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Tedesco</td>
<td>(802) 655-8753</td>
<td>(802) 450-2336</td>
<td>(802) 324-7318</td>
</tr>
<tr>
<td>David Lothrop</td>
<td>(802) 655-8787</td>
<td>(802) 450-4912</td>
<td>(802) 658-3399</td>
</tr>
<tr>
<td>Thomas Murphy</td>
<td>(802) 241-4131</td>
<td>(802) 338-0787</td>
<td>(802) 373-0215</td>
</tr>
</tbody>
</table>

Spill Responder shall notify their Supervisor of the spill, as appropriate.

ESRC shall contact the Spill Responder. The ESRC shall contact Spill Responder to determine additional response activities.

ESRC shall dispatch Al Richer and/or subcontractors to spill site to implement spill cleanup.

ESRC notifies State and/or Federal agencies as appropriate.
Immediate notification to the State of Vermont is required for all spills greater than 2 gallons at 802-241-3888 (weekdays 7:45am - 4:30pm, Waste Management Division) or 800-641-5005 (24-hour State Police Dispatch).
Immediate notification to the National Response Center at 800-424-8802 is required for all spills to waterways or wetlands.

Spill Responder continues spill clean-up activities.
Close area to non-essential foot and vehicle traffic. Do not allow any personnel, other than trained spill response personnel or supervisors, into spill area.
Wear personnel protective clothing during cleanup phase: gloves, disposable coveralls, eye protection, and respirator, as necessary.
Clean up spill with sorbing materials. Remove any contaminated media. Place spill media/residues in 55-gallon DOT-approved drum, for proper disposal. Obtain drum number from Al Richer.

ESRC completes an Incident Report on the Environmental Management System. ESRC may conduct additional interviews with Spill Responder, Al Richer or subcontractors.

ESRC submits a spill response report to State and/or Federal agencies as applicable. State of Vermont spill reports are due within 10 days of the spill notification. The spill report shall be uploaded to the EMS.

Al Richer shall transport containers to the nearest Service Center under a Bill of Lading.
Appendix D

Inventory of Spill Response Materials Form
### MINIMUM INVENTORY OF SPILL RESPONSE MATERIALS

<table>
<thead>
<tr>
<th>RESPONSE EQUIPMENT</th>
<th>Kingdom Community Wind</th>
<th>Bellows Falls</th>
<th>Wilder</th>
<th>Dover S/S</th>
<th>MSC</th>
<th>CSC</th>
<th>Berlin #5</th>
<th>Bolton Falls</th>
<th>Verg. #9</th>
<th>Plant #16</th>
<th>Essex #19</th>
<th>Hydro #1, 2, 6, 15, 22</th>
<th>Wells River</th>
<th>Trucks 201, 206</th>
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<tr>
<td>Spill Cleanup Kits</td>
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<td>1</td>
<td>1</td>
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<td>1</td>
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<td>1 ea.</td>
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<tr>
<td>Tools (sets)</td>
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<tr>
<td>DOT Approved Drums</td>
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<td>A. Open Top</td>
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<td>8</td>
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<td>4</td>
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<td>10</td>
<td>20</td>
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<td>2</td>
<td>6</td>
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<td>3</td>
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<td>B. Closed Top</td>
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<td>1</td>
<td>0</td>
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<td>20</td>
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<td>0</td>
<td>2</td>
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<td>C. Snap Rings</td>
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<td>Absorbents</td>
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<td>A. Fibre Perl</td>
<td>10</td>
<td>25</td>
<td>10</td>
<td>12</td>
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<td>3</td>
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<td>5</td>
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<td>B. Speedi-Dri</td>
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<tr>
<td>C. Absorbent booms</td>
<td>500’</td>
<td>600’</td>
<td>200’</td>
<td>200’</td>
<td>120’</td>
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<td>100’</td>
<td>240’</td>
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<td>3 bales</td>
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<td>7 bales</td>
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<tr>
<td>D. Absorbent Sheets/Pads</td>
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<td>3 bales</td>
<td>3 bales</td>
<td>7 bales</td>
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<td>50’</td>
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<td>50’</td>
<td>75’ @ #2</td>
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<td>Steel trays</td>
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<tr>
<td>B. 42” x 42” x 4”</td>
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<td>3</td>
<td>2</td>
<td>3</td>
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<tr>
<td>Barrier Tape</td>
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<td>N/A</td>
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</tbody>
</table>

**Spill kits contain the following materials:**

- 2 Pr. Tyvek Coveralls Lg.
- 2 Pr. Tyvek Coveralls XLg.
- 4 Pr. Plastic Gloves
- 4 Pr. Rubber Boots
- 4 Pr. Tyvek Boot Covers
- Plastic Sheetings
- 1 bag Absorbent
- 1 bag Speedi-Dri
- 1 Gal. Cleaning Solvent
- Rags: Assorted Paper, Cloth
- Plastic Pail
- Labels: ORM-E & PCB
- Abbreviation: Site Location

- Bellows Falls (Bellows Falls Service Center)
- Wilder (Wilder Service Center)
- Dover S/S (Dover Substation)
- MSC (Montpelier Service Center)
- CSC (Colchester Service Center)
- Berlin #5 (Berlin Plant #5)
- Bolton Falls (Bolton Plant #1)
- Verg. #9 (Vergennes Plant #9)
- Plant #16 (Gorge Plant #16)
- Plant #19 (Essex Plant #19)
- Hydro #1, 2, 6, 15, 22 (Hydro Plants 1, 2, 15 and 22)
- Wells River (Wells River Service Center)
- Trucks 201 and 206 (GMP Utility Trucks 201 and 206)
Appendix E

Bi-Monthly Spill Prevention Inspection Form
Bi-Monthly Spill Prevention Inspection Form

**TRANSFORMERS:**
1. Are oil levels correct  
2. Are oil gauges in good condition  
3. Are tanks free of oil leaks  
4. Liquid temperature  
5. Winding temperature  
6. Have you reset all thermometer max. ind  
7. Are thermometers in good condition  
8. What is the color of the Silica Jell  
9. What is the pressure on the transformer  
10. Are bushings clean and in good condition  
11. What are the power trans. tap settings  
12. Is the appearance of power and instr. Trans. Satisfactory  
13. Do control cabinet gaskets seal properly  
14. Are fans on "Auto"  
15. What is the liquid level of expansion tanks

**ARRESTORS, CAPACITORS, AIR BREAKS, & DISCONNECTS:**
1. Are the arresters undamaged  
2. Are the capacitor tanks & bushings undamaged  
3. Are any capacitor fuses blown? How many?  
4. Are all the switch & disconnects fully closed  
5. Are all the switch & disconnect insulators in good condition

**CIRCUIT BREAKERS:**
1. Are oil levels correct  
2. Are oil gauges in good condition  
3. Are all tanks and bushings free of oil  
4. Are bushings clean and in good condition  
5. Are heaters in operation  
6. Do all air tank blow offs work correctly  
7. Are counter readings recorded in Remarks  
8. Are relay targets recorded in Remarks  
9. Are all indicating lamps operating properly  
10. Are all cabinet gaskets in good condition  
11. Is supervisory on "Remote Control"  
12. Check condition and operation of compressor (oil levels, Belt)

**REGULATORS:**
1. Are all oil levels correct  
2. Are all tanks and bushings free of oil  
3. Does the regulator operate correctly  
4. Are the bushing clean and in good condition

**BATTERY & CHARGER:**
1. Are terminals connectors clean, are they satisfactory  
2. Is the charger operating correctly  
3. D.C. voltage on switchboard

**GENERAL:**
1. Is yard clean & free of stored equipment and tools  
2. Are switch sticks in good condition & properly stored  
3. Are cabinets and cubicles clean and orderly  
4. Do gates lock properly  
5. Have all burned lamps in yard lights been replaced  
6. Are all spare fuses in good condition & properly stored  
7. Are signs & fences in good condition
<table>
<thead>
<tr>
<th>BREAKER</th>
<th>COUNTER</th>
<th>TARGETS</th>
</tr>
</thead>
<tbody>
<tr>
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**REMARKS:**

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

**BY:** ___________________________ **DATE:** ___________________________

**SUBSTATION:** ___________________________
Appendix F

SPCC Annual Training Form
SPCC ANNUAL TRAINING FORM

<table>
<thead>
<tr>
<th>NAME</th>
<th>DESCRIPTION OF TRAINING SESSION</th>
<th>DATE</th>
<th>HOURS</th>
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<tbody>
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