PRELIMINARY
SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) PLAN

FOR

WIND ENERGY CENTERS

In Compliance with Spill Prevention, Control, and Countermeasure (SPCC) Regulations at 40 CFR 112.

FACILITY OPERATOR:
NextEra Energy Resources, LLC
700 Universe Boulevard
Juno Beach, FL 33408

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SECTION **REFERENCE**

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1. INTRODUCTION

1.1 PURPOSE OF PLAN

The NextEra Energy Resources' Power Generation Division Environmental Group ("PGD") has developed this Spill Prevention, Control, and Countermeasure ("SPCC") Plan (hereinafter "Plan") to cover Wind Energy Centers ("Wind Sites" or "Wind Site") located throughout the United States.

The purpose of this Plan is to:

- Provide guidance and information to the personnel that would be called upon to respond to sudden oil releases from oil-filled equipment and oil storage containers;
- Describe measures in place that would prevent released oil from reaching nearby navigable waters;
- Provide a physical description of the Wind Sites covered by this Plan;
- Describe each Wind Site's oil storage provisions, potential to discharge, type of failures, containment/diversionary structures, and drainage system;
- Describe the inspection procedures; and,
- Discuss the discharge response actions and notifications to ensure employees are prepared to carry out their responsibilities during an oil spill incident.

This Plan has the full approval of management with authority to commit the necessary resources to fully implement the Plan, and expeditiously respond to releases of oil (See Section 4 - Management Approval).

1.2 PLAN STRUCTURE

This multi-facility plan format has been adopted to consolidate and address the SPCC requirements for all Wind Sites in a single comprehensive plan, as the development and management of site-specific SPCC Plans are not practicable.

This Plan is divided into four (4) sections, of which neither section stands on its own. Sections 1, 2, and 3 consist of all pertinent information that is applicable to all Wind Sites covered under this Plan. Section 4 provides site-specific information relating to each Wind Site. The site-specific information includes technical amendments (if any), a list of oil-filled equipment/containers having capacities of 55-gallons or greater, pertinent information relating to oil discharges and prevention, a diagram showing the location of the oil-filled equipment/containers and drainage features. Please note that other equipment or features may be shown on the diagram as reference points.

1.3 PLAN AMENDMENTS

This Plan will be revised when any technical or administrative changes are required. Technical changes will be incorporated in the Plan when a change materially affects the potential for a Wind Site to release oil into nearby navigable waters, and require the review and certification by a licensed Professional Engineer ("PE"). Such changes will be prepared within six (6) months, and implemented no later than six (6) months following preparation of the amendment. All other changes to the Plan will be managed as administrative changes which do not require the review and certification of a PE. PGD has an ongoing review process to accommodate this requirement. All amendments to this plan will be managed by PGD.

1.4 FACILITY'S CONFORMANCE WITH SPCC REQUIREMENTS

This Plan conforms to the requirements contained in 40 CFR 112. Spill prevention, control, and countermeasures used at the Wind Sites will be discussed in the appropriate sections that follow. In addition, the Wind Sites comply with other applicable State discharge prevention rules and guidelines as stated in Section 4.

1.5 CROSS REFERENCE INDEX

A Cross Reference Index (on following page) has been prepared that lists the locations of information such that it can be reviewed in the sequence for each specific rule requirement presented in 40 CFR 112.

1.6 CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

The substantial harm criteria will not apply at any Wind Site due to its design, location, and absence of large oil storage containers that trigger the development of a Facility Response Plan in accordance with 40 CFR 112.20. Therefore, a single Certification of Applicability of Substantial Harm Criteria will be signed for this Wind Sites.

1.5 CROSS REFERENCE INDEX

CITATION	DESCRIPTION OF RULE	SECTION
§112.1	Purposes of Plan	Section 1.1
§112.3 (d)	P.E. Certification for Plan	Section 4.7
§112.3 (e)	Location of SPCC Plan	Section 1.2
§112.4 & 112.5 (a)	Plan Amendments	Sections 1.3, 3.1.5 & 4.8
§112.5 (b)	SPCC Plan 5 Year Review	Section 2.11
§112.7	Management Approval	Section 4.6
§112.7	Cross Reference Index	Section 1.5
§112.7(a)(1) and §112.7(a)(2)	Facility's Conformance with SPCC Requirements	Sections 1.4 & 2.8
§112.7(a)(3)	General Facility Information and Facility Diagram General Physical Layout of the Facilities; Facility Diagram; Type of Oil and Storage Capacities; Discharge Prevention Measures; Discharge or Drainage Controls; Countermeasures for Discharge Discovery, Response, and Clean-up; Methods of Disposal	All Sections
§112.7(a)(3)(vi)	Emergency Contact List	Section 4.2
§112.7(a)(4)	Procedure for Reporting a Discharge	Sections 3.1 & 3.3
§112.7(a)(5)	Discharge Response Procedure	Section 3.2
§112.7(b)	Discharge Potential – Prediction of flow rate, direction and total quantity of oil	Sections 4.4, & 4.5
§112.7(c)	Containment and/or Diversionary Structures	Section 4.5
§112.7(d)	Practicability of Secondary Containment	Section 2.9
§112.7(e)	Inspections, Tests and Records	Sections 2.3 & 2.7
§112.7(f)	Personnel Training	Section 2.4
§112.7(g)	Facility Security	Section 2.5
§112.7(h)	Facility Transfer and Tank Truck Loading / Unloading Operations	Section 2.6
§112.7(i)	Integrity Testing and Brittle Fracture Evaluation	Section 2.7
§112.7(j)	Conformance with Applicable State and Local Requirements	Sections 2.8 & 4.3
§112.7(k)	Qualified Oil-Filled Operational Equipment	Section 2.9
§112.8(b)	Facility Drainage	Section 4.4

CITATION	DESCRIPTION OF RULE	SECTION
§112.8(c)	Bulk Oil Storage	Section 2.9
§112.8(c)(1)	Construction	Section 2.9
§112.8(c)(2)	Secondary Containment	Sections 2.9 & 4.5
§112.8(c)(3)	Drainage of Diked Areas	Section 4.4
§112.8(c)(4)	Corrosion Protection	Not applicable
§112.8(c)(5)	Partially Buried and Bunkered Storage Tanks	Not applicable
§112.8(c)(6)	Inspection	Section 2.7
§112.8(c)(7)	Internal Heating Coils	Not applicable
§112.8(c)(8)	Overfill Prevention System	Section 2.9
§112.8(c)(9)	Effluent Treatment Facilities	Not applicable
§112.8(c)(10)	Prompt Correction of Visible Discharges	Section 2.3
§112.8(c)(11)	Mobile and Portable Containers	Section 2.9
§112.8(d)	Facility Transfer Operations	Section 2.6
§112.20(e)	Certification of Applicability of Substantial Harm Criteria	Section 1.6

1.6 CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

This Certificate of Applicability applies to all Wind Sites listed on the reverse. The Substantial Harm Criteria will not apply at a Wind Site due to its design and absence of large oil storage as required below.

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   Yes No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Appendix C, 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
   Yes No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes No

CERTIFICATION

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

Name *(please type or print)* ***Signature***

Title ***Date***

2. SPCC PLAN REQUIREMENTS

2.1 GENERAL FACILITY DESCRIPTIONS

This Plan is applicable for the components that comprise a typical Wind Site, as listed below. Each Wind Site operates 24 hours a day, 365 days a year with normal working hours being from 7:00 AM to 3:30 PM local time, Monday thru Friday. During after-hour periods and holidays, assigned personnel are on-call.

- **Wind Turbine Generators ("WTG")**
  A typical WTG consists of a tower structure with a top mounted housing (i.e., nacelle) containing a 3-bladed rotor system. Oil is used in the WTG's gearbox, hydraulic system, and cooling system located within the nacelle for operational purposes. Each WTG has an oil-filled pad-mounted electrical transformer that sits on the ground near the base of the tower. Several WTG's can operate at a Wind Site which can span for miles.

- **Substation/Switchyard**
  A substation contains certain oil-filled equipment that transforms high voltage to a lower voltage suitable for use at the point of demand. A switchyard contains oil-filled equipment to coordinate the exchange of power between the WTG's and the transmission lines in the area. A typical Wind Site ties into a substation, while only a certain number of Wind Sites tie into a switchyard.

- **Operations & Maintenance Building ("O&M Building")**
  The O&M Building may include, but not limited to, the following activities: vehicular maintenance, refueling, oil storage, offices, shops, inventory services, loading docks, impressed stock and storage. An O&M Building is typically present at each Wind Site and is the primary onsite operations support center.

- **Ancillary Storage**
  Ancillary storage may be utilized at a Wind Site to store bulk oil storage containers (e.g., drums, totes, storage tanks), various types of fuel, or oil-filled equipment (e.g., spare/failed transformers). The ancillary storage may consist of an open or enclosed containment structure such as a shed or outside concrete containment area, an oil diversionary structure, or fixed double walled aboveground storage tanks. These structures are typically located within close proximity to the O&M Building.

With the exception of the O&M Building, every WTG, substation, and switchyard (if present) at each Wind Site are unmanned and remotely monitored by the Fleet Performance & Diagnostics Center ("FPDC") located in Juno Beach, Florida. However, certain equipment monitoring is performed at the O&M Building.

2.2 GENERAL PHYSICAL LAYOUT OF THE FACILITIES

The Wind Site covered under this Plan encompasses an area including thousands of acres, and contains one or more various types of oil-filled equipment or bulk storage containers each having capacities ranging from 55 gallons to 30,000 gallons of oil. These include:

Oil-Filled Equipment
- WTG's (e.g., gear boxes, hydraulic and cooling systems)
- Transformers (e.g., pad-mounted, substation)
- Metering Devices (e.g., PT's, CCVT's)

Bulk Storage Containers
- Portable bulk storage containers (e.g., drums, totes, vehicle mounted tanks)
- Fixed bulk storage containers (e.g., aboveground storage tanks)

2.3 INSPECTIONS AND RECORDS

Visual inspections of bulk storage containers (i.e., drums, totes, portable storage tanks), secondary containment areas, and oil-filled equipment are conducted at least once a quarter, while bulk storage containers that store a flammable or combustible liquid (if present) are inspected monthly as part of the regular facility inspection program. All Wind Site inspections are documented electronically and/or via a paper form. Records of these inspections are maintained for a period of at least three (3) years. During inspections, personnel will observe bulk storage containers, secondary containment/diversionary structures, and oil-filled equipment for any visible signs of deterioration, damage, leaks that may cause a release, and the accumulation of any oil.

Oil leaks identified during inspections will be promptly corrected by the appropriate organizations:

- WTG's…….....PGD Wind Operations
- Transformers / substation equipment…… ..... Transmission / Substation

NOTE: Due to the various climates within the U.S. where Wind Sites operate, the inspection program at a Wind Site may be temporarily suspended at certain times during the year due to adverse weather conditions, or where the safety of personnel may be compromised. The reasons for such suspensions will be documented and maintained with facility inspection records.

2.4 PERSONNEL TRAINING

Annual discharge prevention briefings are held for all applicable personnel to assure adequate understanding of the Plan, and to provide a description of known discharges, failures, malfunctioning components, and any recently developed precautionary measures. Appropriate personnel are also instructed on the operation and maintenance of all equipment to prevent oil discharges. Records of training are filed electronically in the

Environmental Management System (EMS) and maintained at the O&M Building.

2.5 FACILITY SECURITY

General security provisions at a Wind Site include fencing and gates to keep the general public out of the facility. Each Wind Site is surrounded by very low traffic gravel/dirt roads that are used by local landowners in rural communities. These factors limit the risk of vandalism. The following information addresses the specific security requirements of 40 CFR 112.

- Fencing. Fencing is provided around every substation to meet Federal safety and security requirements. Access to the WTG's is provided through access doors that are kept locked when not occupied.
- Flow and Drain Valves. Kept closed when not in use.
- Starter Controls Locked with Controlled Access. Not applicable – there are no starter controls at the Wind Site.
- Pipeline Loading/Unloading Connections Securely Capped. Not applicable – there are no pipeline loading/unloading connections at the Wind Site.
- Lighting Adequate to Detect Spills & Deter Vandalism. The O&M building has adequate outside lighting and lighting inside the WTG's is adequate to detect spills. Outside lighting around the WTG's has not been provided due to the impracticability of installing lighting for such large remote structures that store relatively small quantities of oil.

2.6 FACILITY TRANSFER AND TANK TRUCK LOADING & UNLOADING OPERATIONS

Any tanker trucks utilized at the Wind Site are provided by vendors. The Wind Site does not have unloading racks but rather unloading areas. Therefore, unloading areas are only subject to the general secondary containment requirements in 40 CFR 112.7(c). Active containment measures using onsite spill response equipment will be used to meet this requirement. Tank truck hoses and hose connections used during loading or unloading activities are physically monitored, and may be placed on top of, or wrapped with, oil absorbent materials or contained by other means to protect the environment.

The tank truck loading/unloading procedures at the Wind Site meets the minimum requirements and regulations established by the Department of Transportation ("DOT"). Oil transfer operations occur through aboveground unloading hoses. One or more of the following tank truck spill prevention techniques may be used, as applicable:

- The setting up of barriers or warning signs to prevent a truck from leaving before the completion of unloading.
- Placing wheel chocks on truck tires to prevent vehicle movement during unloading.
- Closely inspecting lowermost drain & all outlets for discharges.
- Ensuring truck drains/outlets are tightened, adjusted or replaced as needed.

- Oil levels are verified, connections are rechecked, and hoses are examined for integrity. Signs are posted warning all vehicular traffic operating in transfer area to use caution.
- Only trained personnel authorized to conduct the transfer are used. The transfer and pumping system is continually monitored for leaks and the oil level in the receiving container is frequently monitored to prevent overfilling.
- The transfer hose is properly drained and disconnected and all tank truck drains and connections are checked for proper closure prior to departure.

Wind Sites typically do not have underground piping or aboveground piping. If underground piping is used, the piping will comply with the corrosion protection requirements in 112.8(d)(1). If aboveground piping is used, the piping will be in compliance with 112.8(d)(2)-(5) which requires capping piping that is not in service, having properly designed pipe supports if applicable, having regular inspections, and warning signs.

2.7 INTEGRITY TESTING & BRITTLE FRACTURE EVALUATION

Integrity testing will not be performed on shop-fabricated aboveground storage tanks, drums, or totes. Drums and totes have a service life of less than ten (10) years and therefore will not require integrity testing. All shop-fabricated aboveground storage tanks used at the Wind Site pose a low risk of internal corrosion. These tanks are visually inspected as described in this Plan and installed at a height such that all sides are visible. As a result, no additional integrity testing is deemed necessary. Since there are no field-constructed tanks used at the Wind Site, brittle fracture evaluations do not apply.

2.8 CONFORMANCE WITH APPLICABLE STATE AND LOCAL REQUIREMENTS

This Plan conforms to the requirements contained in 40 CFR 112. If alternate spill prevention, control or countermeasures are used at the Wind Site, the alternate measure(s) will be discussed in the appropriate section(s) that follow or in the site-specific section. In addition, the Wind Site covered under this Plan comply with other applicable State and local discharge prevention rules and guidelines.

2.9 BULK OIL STORAGE

The Wind Site may occasionally use portable bulk oil storage containers, such as 55-gallon drums or tote containers to support operations. These portable containers are typically stored inside the O&M Building or in ancillary storage, and are captured in Section 4 of this Plan. All portable bulk oil storage containers are either double-walled, placed in an adequately sized and sufficiently impervious secondary containment, on spill containment pallets, or within a containment structure. The installation of secondary containment or diversionary structures is generally practicable at Wind Sites. Although Wind Sites have qualified oil-filled operational equipment that meets the requirements of 40 CFR 112.7(k), this alternative requirement is not typically implemented since Wind Sites have adequate secondary containment or diversionary structures. However, if the Wind Site uses this alternative, an oil spill contingency plan will be developed for the facility.

Additionally, mobile refuelers may be utilized exclusively within the confines of the Wind Site. When not in service, these mobile refuelers are parked (i.e., stored) inside the O&M Building. All mobile refuelers are captured in the Table in Section 4 of this Plan. Due to the extremely low risk of impacting navigable waters from a mobile refueler parked inside the O&M Building, the Wind Site will employ an active containment strategy in accordance with §112.7(c). This strategy will consist of using the sealed concrete floor of the building and a standby spill kit having sufficient materials that can be immediately deployed to effectively contain a release of fuel.

All portable bulk storage containers described in this Section (i.e., 55-gallon drums, totes, and mobile refuelers) are normally transported by site personnel to/from the O&M Building or ancillary storage for temporary use anywhere on the Wind Site. These containers will be listed in the Plan at their normal storage location (i.e. O&M Building, ancillary storage) but will not be listed at specific work locations since their use will be temporary (i.e., less than six (6) consecutive months) as allowed under the regulation.

If fixed bulk storage containers are present at the Wind Site, they are mainly used for fuel storage (i.e., diesel, gasoline). These fixed containers are permanently installed at strategic locations. Fixed bulk storage containers are either double walled or single walled placed in an adequately sized secondary containment structure to contain any oil discharges. Fixed bulk storage containers are captured in this Plan, if applicable.

New and used empty drums may be stored inside/outside the O&M Building or in ancillary storage. These drums are not designated for any specific purpose and therefore are not included in this Plan.

All bulk storage containers used at the Wind Site to comply with the SPCC requirements are engineered solely for the purpose of storing oil (i.e., hydraulic oils, fuels, etc.) and constructed with materials compatible with oil. Fixed bulk storage containers that contain fuel have sight gauges which can be used to quickly determine the liquid level in each container. All bulk oil storage containers are located to prevent a discharge to navigable waters. Any oil released from these containers would be controlled by the containment systems described in this Section.

2.10 DISCHARGE PREVENTION MEASURES

The On-Scene Commander/Alternate is accountable for discharge prevention. This individual is also responsible to follow through on the site's commitment of manpower, equipment, and material in the event of a discharge.

In conjunction with the containment/diversionary measures previously described, the following devices also serve to potentially prevent or detect oil discharges at the Wind Site. All of the WTG's are equipped with sensors to automatically detect a change in fluid pressure or temperature, which enables them to be shut down in case of a fluid leak.

Pad-mounted transformers located at the base of each WTG tower are equipped with

release valves that trip when internal pressure becomes too great, potentially preventing a catastrophic failure of the transformer. If a pad-mount transformer catastrophically fails, personnel would be notified via alarm. Since this type of failure is not an automatic indication of a release of oil, the feeder related to the failure would trip causing site personnel to investigate the cause and specific location of the incident.

The substation transformer(s) is/are equipped with oil level sensors that detect any sudden drop in oil levels, which would send an alarm to the central computer system at the O&M Building. Additionally, the transformer(s) is/are equipped with release valves that trip when internal pressure becomes too great, potentially preventing a catastrophic failure of the transformer.

An enhanced oil diversionary or containment structure may be installed on certain oil-filled equipment due to their location to navigable waters. If applicable, oil containment and diversionary structure design drawings and volume calculations are available for review as “supporting documents.”

2.11 SPCC PLAN 5 YEAR REVIEW

This Plan will be reviewed once every five (5) years, or sooner, in accordance with 40 CFR 112.5(b) to ensure all information is up to date, and to determine if a more effective oil prevention and control technology is applicable for the Wind Sites. The 5-year review of this Plan will be recorded using the SPCC Plan 5-Year Review Form on the following page.

SPCC PLAN 5-YEAR REVIEW FORM

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted once every five years, or sooner. As a result of this review and evaluation, NextEra Energy Resources will amend this SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology has been field-proven at the time of review; and, (2) if such technology will significantly reduce the likelihood of a discharge from the facility. Any technical amendments to this SPCC Plan shall be certified by a licensed Professional Engineer within six months after a change in a Wind Site's design, construction, operation, or maintenance that will materially affect its potential for the discharge of oil as defined in 40 CFR 112.1(b).

I have completed review and evaluation of this SPCC Plan and will or will not amend this Plan, as indicted below.

Review Date	No Changes Required	Plan Will Be Amended	Name	Signature (required only if Plan will be amended)

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3. DISCHARGE RESPONSE, NOTIFICATIONS AND CLEANUP PROCEDURES

3.1 REPORTING A DISCHARGE

3.1.1 INTERNAL/EXTERNAL REPORTING

All spills shall be reported immediately to the Fleet Performance & Diagnostics Center (FPDC) and PGD Environmental Group. **ALL applicable agency notifications shall be made after consultation with the PGD Environmental Group. All contact telephone numbers are provided in the site-specific section (Section 4) of this Plan. The Oil Spill Response Notification Form linked to this Plan (Section 3.3) shall be used to relate the spill information to the applicable agencies.**

3.1.2 SPILLS TO NAVIGABLE WATERS- FEDERAL:

For spills which threaten or enter navigable waters, including adjoining shoreline, notify the following agencies:

- National Response Center 1-800-424-8802

Note: Immediate notification is required to the National Response Center (NRC). Do not wait to obtain all information before notifying NRC.

3.1.3 SPILLS TO SURFACE WATERS – STATE:

For spills that enter waters of the State, including any wetlands, notify the following:

- Applicable State Environmental Agencies ..... See Section 4

3.1.4 SPILLS TO LAND SURFACES – REPORTABLE QUANTITY (RQ):

For spills to land surfaces, which equal or exceed the applicable Reportable Quantity (RQ), notify the following agencies as soon as possible:

- Applicable State Environmental Agencies ..... See Section 4

Depending on the severity of the incident, the following additional agencies may be contacted by the PGD Environmental Group or a person in charge of the event, if necessary.

- Fire Department / Police / Emergency Medical Services 911

Additional follow-up reports will be provided as appropriate if requested by agency personnel.

3.1.5 FORMAL REPORTS

If a Wind Site discharges more than 1,000 U.S. gallons of oil in a single discharge to navigable waters or adjoining shorelines, or has two discharges exceeding 42 U.S.

gallons to navigable waters or adjoining shorelines within any 12-month period, the following information will be submitted to the EPA Regional Administrator and the State agency in charge of oil pollution control. The information will be submitted within sixty (60) days after the above occurrence as outlined at §112.4(a).

- Name of the facility;
- Your name;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- The cause of such discharge as described in §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and,
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

The EPA Regional Administrator may require an amendment to bring the Plan into compliance with the regulations and to prevent and contain discharges of oil from the facility. Technical amendments will be documented in Section 4.

3.2 CLEANUP PROCEDURES

3.2.1 DISCHARGES THAT CAN BE MANAGED BY ONSITE PERSONNEL

Minor functional spills from oil-filled equipment or bulk storage containers include, but not limited to, drips, weeps, or small “burps” from valves, piping, flanges, pumps, rust holes, seams, devices, instruments, gauges, etc.

IMMEDIATE STEPS TO BE TAKEN BY THE SPILL OBSERVER/FIRST RESPONDER:

- Make an immediate assessment of the incident.
- Stop the discharge (e.g., act quickly to secure pumps/equipment). If the incident is clearly the result of an operation that the Spill Observer/First Responder can control safely, take immediate steps to correct the operation.
- If safe to do so, take any steps deemed necessary to minimize any threat to public health and safety and to reduce the severity of the incident.
- Warn personnel - Notify the site manager or senior person on duty, who will then function as the On-Scene Commander. Call for medical assistance if an injury has occurred.
- Shut off ignition sources – motors, electrical circuits, open flames, etc.
- Initiate spill containment – Use appropriate personal protection equipment, and initiate containment if safe to do so. Use absorbent materials and/or soil to create a berm to direct flow of oil away from drainage ditches or waterways. Isolate the affected area and

control entry.
- Make any required agency notifications.

IMMEDIATE STEPS TO BE TAKEN BY ON-SCENE COMMANDER:

- Contact the appropriate spill response vendor - These minor spills are typically cleaned up in accordance with the company spill cleanup protocol, or with the applicable local or State cleanup requirements.
- Make agency notifications, if required.

3.2.2 DISCHARGES BEYOND THE CAPABILITY OF ONSITE PERSONNEL

In the case of a spill beyond the capability of site personnel, the following initial control measures should be taken:

IMMEDIATE STEPS TO BE TAKEN BY THE SPILL OBSERVER/FIRST RESPONDER:

- Make an immediate assessment of the incident.
- Stop the discharge, if possible (e.g., act quickly to secure pumps/equipment). If the incident is clearly the result of an operation that the Spill Observer/First Responder can control safely, take immediate steps to stop the operation.
- Warn on-site personnel – Call for medical assistance if an injury has occurred.
- Shut off ignition sources – motors, electrical circuits, open flames, etc.
- Initiate spill containment –If safe to do so, use absorbent materials or other means to create a diversionary berm to direct any overland flow of oil from migrating off the site. Isolate the affect area and control entry. Avoid contact with any oils.

IMMEDIATE STEPS TO BE TAKEN BY WIND SITE MANAGER:

- Assume the position of On-Scene Commander, or assign to a designee.
- Evaluate spill information given by the first responder. – Verify that medical assistance has been requested if injury is reported.
- Contact Spill Response Vendor – coordinate the equipment needed.
- Make agency notifications, if required.
- Proceed to spill location and supervise spill containment and cleanup**.**

3.3 OIL SPILL RESPONSE REPORTING FORM

The On-Scene Commander or designee may utilize the Oil Spill Response Reporting Form in order to relay information about the event to all applicable agencies. Follow-up notifications will be provided to the appropriate agencies, if applicable. All spill events are recorded by PGD.

3.4 COUNTERMEASURES FOR DISCHARGE DISCOVERY, RESPONSE AND CLEANUP

An adequate amount of oil spill cleanup materials is available onsite for immediate use. However, the spill response vendor(s) identified in Section 4 have access to resources and materials to handle all oil releases from the Wind Site. Discharge countermeasures are also addressed in section 3.2 of the Plan.

3.5 METHODS OF DISPOSAL

Disposal of spilled or recovered materials will be managed in accordance with all applicable State, County, or local requirements. Any recovered oil will be managed as new product, used oil, or hazardous waste, as applicable. Oil contaminated soil/solid waste will be disposed of at approved solid waste disposal facilities. If soil or oil analysis is required, a State-certified laboratory will be utilized.