

RMR Aggregates, Inc.

Mid-Continent Quarry SPCC Plan

March, 2019

Prepared by



Greg Lewicki And Associates, PLLC

3375 W. Powers Circle
Littleton, CO 80123

Phone: (720) 842-5321
E-mail: info@lewicki.biz

Fax (303) 346-6934

TABLE OF CONTENTS

	Page
Introduction	3
Part 1: Plan Administration	
1.1 Management Approval and Designated Person	5
1.2 Professional Engineer Certification	6
1.3 Location of SPCC Plan	7
1.4 Plan Review	7
1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational	8
1.6 Cross-Reference with SPCC Provisions	8
Part 2: General Facility Information	
2.1 Facility Description	11
2.2 Evaluation of Discharge Potential	13
Part 3: Discharge Prevention – General SPCC Provisions	
3.1 Compliance with Applicable Requirements	14
3.2 Facility Layout Diagram	14
3.3 Spill Reporting	14
3.4 Potential Discharge Volumes and Direction of Flow	14
3.5 Containment and Diversionary Structures	15
3.6 Practicability of Secondary Containment	15
3.7 Inspections, Tests, and Records	16
3.8 Personnel, Training, and Discharge Prevention Procedures	22
3.9 Security	24
3.10 Tank Truck Loading/Unloading Rack Requirements	24
3.11 Brittle Fracture Evaluation	25
3.12 Conformance with State and Local Applicable Requirements	25
Part 4: Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Production Facilities)	
4.1 Facility Drainage	26
4.2 Bulk Storage Containers	27
4.3 Transfer Operations, Pumping, and In-Plant Processes	32
Part 5: Discharge Response	
5.1 Response to a Minor Spill	35
5.2 Response to a Major Discharge	36

5.3 Waste Disposal	37
5.4 Spill Notification Forms and Discharge Notification	37
5.5 Cleanup Contractors and Equipment Suppliers	38

Appendix A – Figures

Appendix B – Tank Ultrasonic Shell testing protocol

INTRODUCTION

Purpose

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by RMR Aggregates, Inc. to prevent oil discharges from occurring, and to prepare RMR Aggregates, Inc. to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations*, Part 112 (40 CFR part 112).

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

RMR Aggregates, Inc. management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the “Substantial Harm Determination” included in this Plan.

This Plan provides guidance on key actions that RMR Aggregates, Inc. must perform to comply with the SPCC rule:

Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists.

- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 8 Regional Administrator (RA) and the Colorado Department of Public Health and Environment (CDPHE), along with other information as detailed in Section 5 of this Plan:
 - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or
 - The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.

- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).

Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log, but do not have to be certified by a PE.

Part 1: Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

RMR Aggregates, Inc. is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan has the full approval of RMR Aggregates, Inc. management. RMR Aggregates, Inc. has committed the necessary resources to implement the measures described in this Plan.

The Facility Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Authorized Facility Representative (facility response coordinator): Robert Wagner

Signature: _____

Title: _____

Date: _____

1.2 Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [40 CFR 112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan.

1.2.1 Required Improvements

The Professional Engineer’s certification of this plan is contingent on the following facility improvements being implemented for compliance with SPCC regulations 40 CFR 112:

Signature: _____

Name: _____

State and Registration #: _____

Company: _____

Date: _____

1.3 Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e)(2), a complete copy of this SPCC Plan is maintained at the RMR Aggregates, Inc. headquarters.

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), RMR Aggregates, Inc. periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- < commissioning of containers;
- < reconstruction, replacement, or installation of piping systems;
- < construction or demolition that might alter secondary containment structures; or
- < changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- < change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- < change in the name or contact information of spill response or cleanup contractors.

RMR Aggregates, Inc. must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), RMR Aggregates, Inc. reviews this SPCC Plan at least once every five years (in the past, such reviews were required every three years). Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). This Plan is dated 3/5/2019. The next plan review is therefore scheduled to take place on or prior to November, 2023.

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log. This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by November, 2023.

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

Bulk storage containers at this facility have never been tested for integrity since their installation. Section 4.2.6 of this Plan describes the inspection program to be implemented by the facility following a regular schedule, including the dates by which each of the bulk storage containers must be tested.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

This SPCC Plan does not follow the exact order presented in 40 CFR part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR part 112.

Table 1-1: Plan Review Log

By	Date	Activity	PE certification required?	Comments
Ben Langenfeld	3/5/2019	Writing plan	Yes	Initial SPCC plan

Date	Scope	PE Name	Licensing State and Registration #
3/5/2019	Initial SPCC Plan Preparation	Ben Langenfeld	CO 0047151

Table 1-2: SPCC Plan Cross-Reference with CFR

Provision	Plan Section	Page
112.3(d)	Professional Engineer Certification	6
112.3(e)	Location of SPCC Plan	7
112.5	Plan Review	7
112.7	Management Approval	5
112.7	Cross-Reference with SPCC Rule	10
112.7(a)(3)	Site Plan and Facility Diagram	14 and Appendix A
112.7(a)(4)	Discharge Notification	37
112.7(a)(5)	Part 5: Discharge Response	34
112.7(b)	3.4 Potential Discharge Volumes and Direction of Flow	14
112.7(c)	3.5 Containment and Diversionary Structures	15
112.7(d)	3.6 Practicability of Secondary Containment	15
112.7(e)	3.7 Inspections, Tests, and Records	16
112.7(f)	3.8 Personnel, Training and Discharge Prevention Procedures	22
112.7(g)	3.9 Security	24
112.7(h)	3.10 Tank Truck Loading/Unloading	24
112.7(i)	3.11 Brittle Fracture Evaluation	25
112.7(j)	3.12 Conformance with Applicable State and Local Requirements	25
112.8(b)	4.1 Facility Drainage	26
112.8(c)(1)	4.2.1 Construction	28
112.8(c)(2)	4.2.2 Secondary Containment	28
112.8(c)(3)	4.2.3 Drainage of Diked Areas	28
112.8(c)(4)	4.2.4 Corrosion Protection	28
112.8(c)(6)	4.2.6 Inspection - Facility Inspection Checklists	29
112.8(c)(8)	4.2.8 Overfill Prevention System	32
112.8(c)(10)	4.2.10 Visible Discharges	32

Part 2: General Facility Information

Name: RMR Aggregates, Inc., Inc.

Address: Mid-Continent Quarry
1001 Transfer Trail
Glenwood Springs 81601

Type: Limestone Quarry

Date of Initial Operations: 2019 (SPCC start up)

Owner/Operator: RMR Aggregates, Inc.
4601 DTC Blvd, Suite 130,
Denver, CO 80237
720-614-5213

Primary contact: Robert Wagner
Work: 720-614-5213
Cell (24 hours):

2.1 Facility Description (40 CFR 112.7(a)(3))

2.1.1 Location and Activities

The Mid-Continent Quarry is a limestone quarry operation located 2 miles north of Glenwood Springs, Colorado. The limestone deposit is approximately 175 feet thick is overlain by soil and overburden ranging from 0 to 48 inches. The entire operation takes place within the limestone deposit, which sits atop the hill knob located between Cascade and Oasis Creeks.

Mining activity consists of drilling and blasting a limestone deposit followed by crushing the material to specific sizes for sale. Primary crushing and screening on the active mining bench is portable and moves throughout the site as active mining moves across the site. Secondary processing takes place in the mill building on the mill level.

The operations at the Mid-Continent Quarry involve the use of numerous diesel powered mobile equipment. Therefore large quantities of off-highway diesel are stored on site.

2.1.2 Oil and Fuel Storage

The capacities of oil containers present at the site are listed below and are also indicated on Map C-4 and Map C-6. The 10,000 gallon tanks are located at the fuel farm on the Mill Level (Map C-4). The 2,000 gallon tank is located on the active mining bench (Map C-6).

Table 2-1: Oil Containers

ID	Content	Size	Location	Secondary Containment
DB1	Off-road diesel	10,000 gallon	Mill Level	Double Wall Tank
DB2	Off-road diesel	10,000 gallon	Mill Level	Double Wall Tank
DB3	Off-road diesel	2,000 gallon	Active Mining Bench	Double Wall Tank

Other Containers:

1. Various other tanks associated with mobile equipment used for the sole purpose of motive power. These tanks are not regulated under the SPCC rule. See **40 CFR 112.1(d)(2)(ii)(B)**

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located roughly a mile north of the Colorado River. An unnamed drainage south of the mill level is what the entire facility drains to. Oasis Creek is 2000 feet to the west and Cascade Creek is 450 feet to the east. Both creek drainages are separated from the facility topographically by ridgelines or by runoff control structures implemented during operations.

2.2.2 Discharge History

Table 2-1 summarizes the facility's discharge history.

Table 2-2: Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
None		

PART 3: Discharge Prevention - General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

All oil containing tanks are either double-walled (DB1, 2, & 3) or located within a storage container for secondary containment (all <55 gallon drums).

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Maps C-4 and C-6 show the locations of the mill level fuel farm (2-10,000 gallon tanks) and the 2,000 gallon tank located on the active mining bench. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of AST.

3.3 Spill Reporting (40 CFR 112.7(a)(4))

The discharge notification form will be completed upon detection of a discharge by the Environmental Manager and prior to reporting a spill to the proper notification contacts.

3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 3-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

3.4.1 Tank Labeling

All tanks with a capacity of ten barrels or greater will be labeled with the following information: name of operator, operator's emergency contact telephone number, tank capacity, tank contents, and National Fire Protection Association (NFPA) label. Smaller tanks will be labeled with contents and NFPA label

Table 3-1: Potential Discharge Volumes and Direction of Flow

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Failure of aboveground tank (collapse or puncture below product level)	10,000	Gradual to instantaneous	Varies	Double-walled tanks
Tank overfill	1 to 120	60 gal/min	Varies	Site berms and site topography
Pipe failure	100	50 gal/min	Varies	Land-based spill response capability (spill kit)
Leaking pipe or valve packing	100	1 gal/min	Varies	Land-based spill response capability (spill kit)
Diesel dispenser hose/connections leak	1 to 150	30 gal/minute	Varies	Land-based spill response capability (spill kit)
Leak or failure of drum	1 to 55	Gradual to instantaneous	Varies	Storage container walls

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

Methods of secondary containment at this facility include a combination of structures (e.g., berm and site topography) and land-based spill response (e.g., sorbents) to prevent oil from reaching the nearest drainage. The capacities of the containment are shown in Table 2-1.

- < For bulk storage containers (refer to Section 4.2.2 of this Plan):
 - < All double walled tanks.
- < In transfer areas and other parts of the facility where a discharge could occur:
 - < **Drip pans.** Fill ports for all ASTs are equipped with drip pans to contain small leaks from the piping/hose connections.
 - < **Sorbent material.** a Spill cleanup kit of at least 90 gallons or more that include absorbent material, booms, and other portable barriers is located near the FB1 Tank. The spill kit is located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

RMR Aggregates, Inc. management has determined that secondary containment is practicable at this facility.

3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

As required by the SPCC rules, RMR Aggregates, Inc. performs the inspections, tests, and evaluations listed in the following Table 3-2. The table summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

Table 3-2: Inspection and Testing Program

Facility Component	Action	Frequency/Circumstances
Aboveground container with all sides visible	Test container integrity by conducting visual inspection. Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Container supports and foundation	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
Diked area, lined berms and site berms	Inspect for signs of deterioration, discharges, or accumulation of oil inside diked areas. Visually inspect content for presence of oil.	Monthly Prior to draining
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly
Buried piping	Inspect for deterioration. Integrity and leak testing.	Whenever a section of buried line is exposed for any reason. At the time of installation, modification, construction, relocation, or replacement.

Note: If any above ground container is added to the site at a later date, where all sides are not visible, alternative testing requirements will be needed and the plan will need to be modified.

All secondary containment will be inspected following a rainstorm and pumped out as needed.

3.7.1 Daily Inspection

A RMR Aggregates, Inc. employee performs a complete walk-through of the facility each day during normal operation. This daily visual inspection involves: looking for tank/piping damage or leakage, stained or discolored soils, or excessive accumulation of water in the containment. All types of secondary containment should be visually checked for damage.

Monthly Inspection Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed or during normal site closure. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives “yes” as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
<i>Tank surfaces show signs of leakage</i>			
<i>Tanks are damaged, rusted or deteriorated</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Precipitation present in secondary containment</i>			
<i>Secondary containment is damaged or stained</i>			
<i>Site berms are Damaged</i>			
Piping			
<i>Valve seals, gaskets, or other appurtenances are leaking</i>			
<i>Pipelines or supports are damaged or deteriorated</i>			
<i>Joints, valves and other appurtenances are leaking</i>			
<i>Buried piping is exposed</i>			
Loading/unloading and transfer equipment			
<i>Connections are not capped or blank-flanged</i>			
Security			
<i>Fencing, gates, or lighting is non-functional</i>			
<i>Pumps and valves are locked if not in use</i>			
Response Equipment			

Date: _____

Signature: _____

Annual Inspection Checklist

This inspection record must be completed *each year*. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives “yes” as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
<i>Tank surfaces show signs of leakage</i>			
<i>Tanks are damaged, rusted or deteriorated</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Precipitation present in secondary containment</i>			
<i>Secondary containment is damaged or stained</i>			
Piping			
<i>Valve seals, gaskets, or other appurtenances are leaking</i>			
<i>Pipelines or supports are damaged or deteriorated</i>			
<i>Joints, valves and other appurtenances are leaking</i>			
<i>Buried piping is exposed</i>			
Loading/unloading and transfer equipment			
<i>Connections are not capped or blank-flanged</i>			
Secondary Containment			
<i>Site berm is not preventing discharge</i>			
<i>Concrete Bunker is damaged or stained</i>			
Security			
<i>Fencing, gates, or lighting is non-functional</i>			
<i>Pumps and valves are locked if not in use</i>			
Response Equipment			
<i>Response equipment inventory is complete</i>			

Date: _____ Yr: _____ Signature: _____

Annual reminders:

- * Hold SPCC Briefing for all oil-handling personnel (and update briefing log in the Plan);
- * Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed;

3.7.4 Periodic Integrity Testing

In addition to the above monthly and annual inspections by facility personnel, tank integrity is verified with the leak detection system. Leak detection systems consist of an interstitial monitoring device installed in the double-walled tanks. These may be automatic electronic sensors or manual visual monitors. If the interstitial monitor is a manual visual one, it is to be checked a minimum of once a month.

3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))

The Facility Manager is the facility designee and is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

RMR Aggregates, Inc. management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Facility Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the Training Form and maintained with this SPCC Plan for a period of three years.

3.9 Security (40 CFR 112.7(g))

RMR Aggregates, Inc. takes steps at each site to ensure they are safe and secure. Gates on access roads will be the primary security measure. The quarry will also be operating 24 hours a day, with personnel constantly present on site.

3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7(h))

The potential for discharges during tank truck loading and unloading operations is addressed at each facility using site berms. RMR Aggregates, Inc. management is committed to ensuring the safe transfer of material to and from storage tanks. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

3.10.1 Secondary Containment (40 CFR 112.7(h)(1))

All drums and tanks have secondary containment. The containment consists of structures directly around the tanks (double-walled, berms, etc.) and the site berm which is the end of the flow path. The quarry has sufficient capacity to collect all tank capacity plus precipitation. All loading areas have drip pans to be used during the disconnection of transfer hoses.

Secondary containment will always be sized to have a volume of 110% of the largest tank or drum stored in said secondary containment. Such secondary containment volume will be confirmed prior to filling any tank or drum to be stored within.

3.10.2 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation. RMR Aggregates, Inc. ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Facility Manager or his/her designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in Table 3-3. This table is also posted next to the loading/unloading point.

Table 3-3: Fuel Transfer Procedures

Stage	Tasks
Prior to loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume (ullage) is available in the storage tank or truck. <input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks. <input type="checkbox"/> Ensure that the vehicle’s parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system.
During loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Driver must stay with the vehicle at all times during loading/unloading activities. <input type="checkbox"/> Periodically inspect all systems, hoses and connections. <input type="checkbox"/> When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. <input type="checkbox"/> When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Make sure the transfer operation is completed. <input type="checkbox"/> Close all tank and loading valves before disconnecting. <input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting. <input type="checkbox"/> Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. <input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.

3.11 Brittle Fracture Evaluation (40 CFR 112.7(i))

There are no field constructed tanks on site.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))

All bulk storage tanks at this facility are registered with the state and local authorities if required and have current certificates of registration and special use permits required by the local fire code. All above ground tanks are strictly for the limestone mining and processing operation. No off site trucks are loaded from these tanks. For this reason, the above ground tanks do not fall under the rules of the Colorado Division of Oil and Public Safety.

PART 4: Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Production Facilities)

4.1 Facility Drainage (40 CFR 112.8(b))

All secondary containment structures do not drain. RMR Aggregates, Inc. takes steps at each facility to ensure that any spills are contained. The site is covered under a Stormwater Management Plan, which can be found with this SPCC Plan.

Record of Containment Stormwater Pumping

This record must be completed when rainwater from containment areas is pumped out of the containment. Discharge of water which is free of an oil sheen, can be to the pit floor.

Date	Diked Area	Oil Sheen	Time	Signature

4.2 Bulk Storage Containers (40 CFR 112.8(c))

Table 4-1 summarizes the construction, volume, and content of bulk storage containers at the Mid-Continent Quarry.

Table 4-1: List of Oil Containers

Tank	Location	Type (Construction Standard)	Capacity (gallons)	Content	Discharge Prevention & Containment
DB1&2	Mill Level	Steel tank	10,000	Diesel	Double-walled
DB1	Active Mining Bench	Steel tank	2000	Diesel	Double-walled

4.2.1 Construction (40 CFR 112.8 (c)(1))

All oil tanks used at this facility are constructed of steel, in accordance with industry specifications as described above. The design and construction of all bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

The full complement of tanks and their respective secondary containment is shown in Table 2-1. Precipitation is not a concern for double walled tanks. **All secondary containments must be maintained in good condition and evaluated monthly, as shown on the monthly inspection sheet. Any secondary containment used must be measured to confirm sufficient volume prior to storage of containers in said secondary containment.**

4.2.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

This does not apply to the quarry.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

There are no underground storage tanks on site and all above ground tanks are elevated therefore, no cathodic protection is required on all above ground tanks.

4.2.5 Partially Buried and Bunkered Storage Tanks (40 CFR 112.8(c)(5))

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility.

4.2.6 Inspections and Tests (40 CFR 112.8(c)(6))

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in STI Standard SP-001. The external inspection includes ultrasonic testing of the shell, as specified in the standard, or if recommended by the certified tank inspector to assess the integrity of the tank for continued oil storage.

Records of certified tank inspections are kept at the facility for at least three years. Shell test comparison records are retained for the life of the tanks.

Table 4-2 summarizes inspections and tests performed on bulk storage containers ("EE" indicates that an environmentally equivalent measure is implemented in place of the inspection/test, as discussed in Section 3.1 of this Plan).

The recommendations for integrity testing are based on a) the knowledge of the tank history, b) the fact that all tanks are shop constructed, c) past tank performance, d) the visible condition of the tanks, and e) the quality and volume of secondary containment.

Table 4-2: Scope and Frequency of Bulk Storage Containers Inspections and Tests

Inspection/Test	Tank ID		
	DB1	DB2	DB3
Visual inspection by facility personnel (as per checklist of Section 3.7)	M A	M A	M A
External inspection by inspector (as per STI Standard SP-001)	5Y	5Y	5Y
Internal inspection by certified inspector (as per STI Standard SP-001)	5Y	5Y	5Y
Tank tightness test meeting requirements of 40 CFR 280			

Legend: M: Monthly
 A: Annual
 5Y: Inspection not required until 2023
 * Or earlier, as recommended by the certified inspector based on findings from an external inspection.
 † Internal inspection may be recommended by the certified inspector based on findings from the external inspection.

Rationale for the initial external shell testing of tanks is demonstrated in Table 4-3 below. Initial ultrasonic shell testing will be performed by a qualified person according to the protocol included in Appendix B. The report of the testing will be attached to this plan and will be available on site. Based on the results of this testing, the tanks will either be placed out of service or a new test period will be established.

Table 4-3 Rationale for Determination of Tank Shell testing per SP-001

Site

Tank ID	DB1	DB2	DB3	
Tank Size (gallons)	10,000	10,000	2000	
Liquid	Diesel	Diesel	Diesel	
Shop Constructed	Yes	Yes	Yes	
Year Placed in Service	0	0	0	
Past leaks or other problems	No	No	No	
All Sides Visible	Yes	Yes	Yes	
Bottom Visible	Yes	Yes	Yes	
Visible Condition				
Type of Secondary Containment	Double-walled	Double-walled	Double-walled	
Secondary Containment Volume	11,000	11,000	2200	
Containment % of Tank Size	110%	110%	110%	
Leak Detection	Yes	Yes	Yes	
Visual Inspection Frequency	Monthly	Monthly	Monthly	
Required Shell Test Inspection date	2023	2023	2023	

4.2.7 Heating Coils (40 CFR 112.8(c)(7))

None of the tanks onsite have heating coils.

4.2.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))

General secondary containment is provided in the event of overfills, as described in this Plan. Storage drums are not refilled, and therefore overfill prevention systems do not apply.

4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

Water discharge takes place from the mill level via the approved outfall. This outfall are for the discharge of stormwater only and are visually monitored per Colorado Dept. of Public Health and Environment permit requirements for the site. This visual monitoring includes checking for the presence of petroleum products.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are quickly corrected upon discovery.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Small containers (<55 gallons) are stored at the Fuel Farm on the mill level in a storage container. There are no mobile tanks.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

Transfer operations at this facility include:

- * The filling of mobile equipment.

Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin.

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are visually inspected during the monthly inspection of the facility.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

Mobile fueling will occur in a designated area on the active production bench and the mill bench. This area will have a collection trough installed over which all mobile fueling is to occur to collect drips of

fuel or small spills during fueling. This trough will be emptied daily or when it is 2/3rds full. The active production bench fueling area will be near the crusher. The mill bench fueling area will be adjacent to the fuel farm.

Part 5: Discharge Response

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater and/or surface water is prohibited by state and federal laws. Immediate action must be taken to control, contain, and recover discharged product.

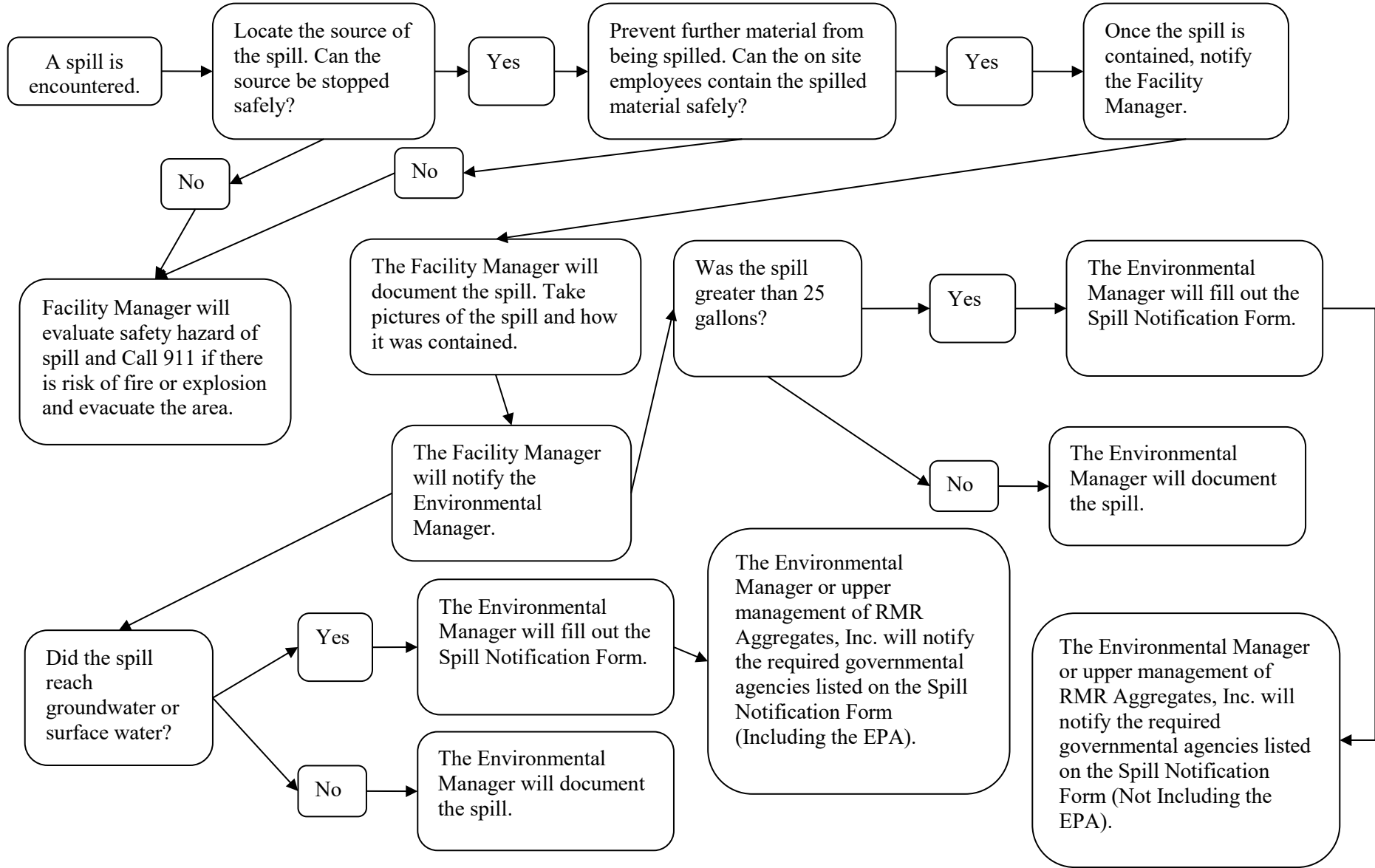
This section describes the cleanup response and protocols to follow in the event of an oil or diesel spill. The uncontrolled discharge of oil or diesel to groundwater, surface water or soil is prohibited by State or Federal laws. It is imperative that action be taken to respond to a spill once it has occurred. In the event of an oil spill, depending on the volume and characteristics of the material released, the operator has defined spill response as either a “Minor Spill Response” or “Major Spill Response” (“Spill Emergency”). A list of Emergency Contacts is included.

BLM Spill Contact Plan

RMR will contact the Colorado River Valley Field Office and report any spills that take place at the quarry. Minor spills will be detailed within 48 hours of occurrence. Major spills will be detailed to the BLM office IMMEDIATELY.

The Facility Manager, or someone they designate, will be responsible for contacting the BLM office. If a major spill takes place during a time when the BLM office is closed, an appropriate message will be left, and the office contacted again during normal business hours. All communication efforts will be documented by site personnel.

5.1 Minor Spill Response



5.2 Response to a Major Discharge

Due to the secondary containment of the oil and fuel tanks on site, and the 3rd level of containment, which is the site berms and topography, the possibility of a major discharge to any River is very unlikely. However, the possibility is addressed below.

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- * The discharge is large enough to spread beyond the immediate discharge area;
- * The discharged material enters water;
- * The discharge requires special equipment or training to clean up;
- * The discharged material poses a hazard to human health or safety; or
- * There is a danger of fire or explosion.

In the event of a major discharge from the site, the following guidelines apply:

- * If there is a chance of an ignition or any other condition that would put the site personnel at risk, all workers must immediately evacuate the discharge site via the designated access road.
- * If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. For example, if oil reaches a sanitary sewer, the publicly owned treatment works (POTW) should be notified immediately. A discharge that threatens the Colorado River may require immediate notification to downstream users such as the area drinking water plant. The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.
- * The Facility Manager (or senior on-site person) must notify the Fire Department or Police Department.
- * The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in this section.
- * The Facility Manager (or senior on-site person) must immediately contact the CDPHE Colorado Office of Emergency Management: 303-273-1778 and the National Response Center (888-424-8802).
- * The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in this section and attach a copy to this SPCC Plan.
- * The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

5.3 Waste Disposal

Wastes resulting from a minor spill response will be containerized in impervious bags, drums or buckets. The waste will be removed from the site by a licensed waste hauler within two weeks. Wastes resulting from a major spill response will be removed and disposed of by a cleanup contractor.

5.4 Spill Notification Forms and Discharge Notification

If a minor spill exists and the can be contained by site personnel, after the appropriate phone calls are made and the spill is contained, a Spill Notification Form shall be completed and submitted to the Facility Manager. This form is included in the following pages. The Spill Notification Form includes a checklist to document the proper notification of state and federal agencies. The form shall be filed and maintained for 3 years.

Any size discharge occurs, (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in this section to facilitate reporting. The person reporting the discharge must provide the following information:

- * Name, location, organization, and telephone number
- * Name and address of the party responsible for the incident
- * Date and time of the incident
- * Location of the incident
- * Source and cause of the release or discharge
- * Types of material(s) released or discharged
- * Quantity of materials released or discharged
- * Danger or threat posed by the release or discharge
- * Number and types of injuries (if any)
- * Media affected or threatened by the discharge (i.e., water, land, air)
- * Weather conditions at the incident location
- * Any other information that may help emergency personnel respond to the incident

5.5 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors are provided in this section. These contractors have the necessary equipment to respond to a discharge of oil that can affect a navigable water, including floating booms and oil skimmers.

The 90+ Gallon Spill kit is located near DB 2&3. The inventory of response supplies and equipment is typical of a large spill kit, which includes booms, pillow, socks, pads, overpack container with screw lid, bags, gloves and instructions. The inventory is verified on a monthly basis. Additional supplies and equipment may be ordered from the following sources:

Spill 911	(800) 474 5911
Creative Safety Supply	(866) 754-0160

Contractors for Significant Spills and/or Significant Discharges

Custom Environmental Services, Inc.
Arvada, CO 80002
Tel+1 (303) 423-9949
Tel+1 (800) 310-7445
Fax+1 (303) 423-1854
Environmental contractor incl. oil spill,
HAZMAT and asbestos.

Veolia ES Special Services
Henderson, CO 80640
Tel +1 (800) 688-4005
Fax +1 (303) 371-7678

Custom Environmental Services, Inc.
Colorado Springs, CO 80907
Tel+1 (719) 598-1557
Tel+1 (800) 310-7445
Fax+1 (719) 598-2687

Environmental Restoration LLC
Commerce City, CO 80022
Tel +1 (303) 382-1258
Tel +1 (888) 814-7477
Fax +1 (303) 382-1285

Emergency Contacts	
Spill Reporting	
	Telephone #
EPA (Natl Response Center)	(800) 424-8802
Colorado Dept. of Health and Environment	(877) 518-5608
Bureau of Land Management, Colorado River Valley Field Office	(970) 876-9000
Colorado DRMS	(303) 866-3567
Local Health Department	(970) 945-6614
MSHA	(303) 231-5465
Local Emergency Agencies	
	Telephone #
Fire Department	911
Sheriff/Police	911
Spill Response Contractors	
	Telephone #
Greg Lewicki and Associates	(720) 842-5321
Adequate Heavy Equipment Kept Onsite for Rapid Spill Response	
Owner/Operator	
	Telephone #
RMR Aggregates, Inc.	720-614-5213
Robert Wagner	720-614-5213

This emergency contact list is to be posted on a large placard within the mine office.

Spill Notification/Documentation Form		
Part A: Basic Spill Data		
Spill Type: Major / Minor <input type="checkbox"/> Major <input type="checkbox"/> Minor		Spill Date:
Type of Spilled Substance:		Spill Time:
Quantity Spilled:		Spill Duration:
Facility Name:		Location of Spill:
Owner / Company Name:		Release to : <input type="checkbox"/> Containment <input type="checkbox"/> River <input type="checkbox"/> Pond <input type="checkbox"/> Soil <input type="checkbox"/> Air <input type="checkbox"/> Ground water <input type="checkbox"/> Other
Nature of spill and any environmental or health effects:		<input type="checkbox"/> Injuries <input type="checkbox"/> Fatality
*Complete Part B if the spill is greater than 25 gallons		
Part B: Notification Checklist		
Spill of greater than 25 gallons of petroleum product:	Notification Date and Time	Name of Person the Received Call
Colorado Department of Public Health and Environment (877) 518-5608		
Local Health Department (970) 945-6614		
Colorado Division of Reclamation, Mining and Safety (303) 866-3567		
MSHA (303) 231-5465		
BLM Colo. River Valley Field Office (970) 876-9000		
EPA National Response Center (800) 424-8802		
Spill reaches ground water or surface water:		
Form Completed By (Print Name):		Sign and Date:

This form must be submitted to the Facility Manager. A copy must be retained on-site and included with the SPCC Plan.

Substantial Harm Determination

Facility Name: Mid-Continent Quarry
Facility Address: Mid-Continent Quarry
1001 Transfer Trl
Glenwood Springs 81601

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 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 appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III 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 appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III 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.

Signature: _____

Title: EHS Manager

Robert Wagner

Date: _____

Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Robert Wagner Cell (24 hrs):		
Discharge in amount exceeding 10 gallons and <i>not affecting a waterbody or groundwater</i>		
Local Fire Department 911		
Colorado Department of Public Health and Environment (877) 518-5608		
Discharge in any amount and affecting (or threatening to affect) a waterbody		
Local Fire Department Fire Chief: Unknown or 911		
Colorado Department of Public health and Environment (877) 518-5608		
National Response Center (800) 424-8802		
*Local Water Department Unknown		
Custom Environmental Services, Inc. Arvada, CO 80002 Tel+1 (303) 423-9949		

* The Water Department should be notified of a discharge only if oil/diesel has reached or threatens the intake system along a significant navigable waterway near the site.

Appendix A – Figures

Appendix B – Ultrasonic Shell Test Protocol

RMR Aggregates, Inc., INC.
Tank Thickness Testing Protocol

In addition to physical inspections conducted at intervals specified in Spill Prevention Countermeasure and Control Plans, external ultrasonic thickness (UT) measurements of the above ground storage tank (AST) shells shall be performed. External UT measurements of the tank shell are a form of non-destructive testing used to locate potential flaws or areas of localized corrosive attack and establish a general rate of shell corrosion on the interior surface of the tank shell.

To insure that primary containment is satisfactory to contain petroleum products, integrity testing shall be conducted on each vessel designated for testing in the SPCC Plan. The following protocol shall be followed in determining the wall thickness of those individual tanks specified for testing:

Field UT measurements are taken with a Hitachi HT300 Ultrasonic Digital ThicknessMeter. The Ultrasonic Meter shall be set per manufacturer recommendations for the type of metal being tested. Field calibrations shall be performed prior to and during testing using the Zero Adjustment test piece attached to the meter at increments not to exceed 1 hour.

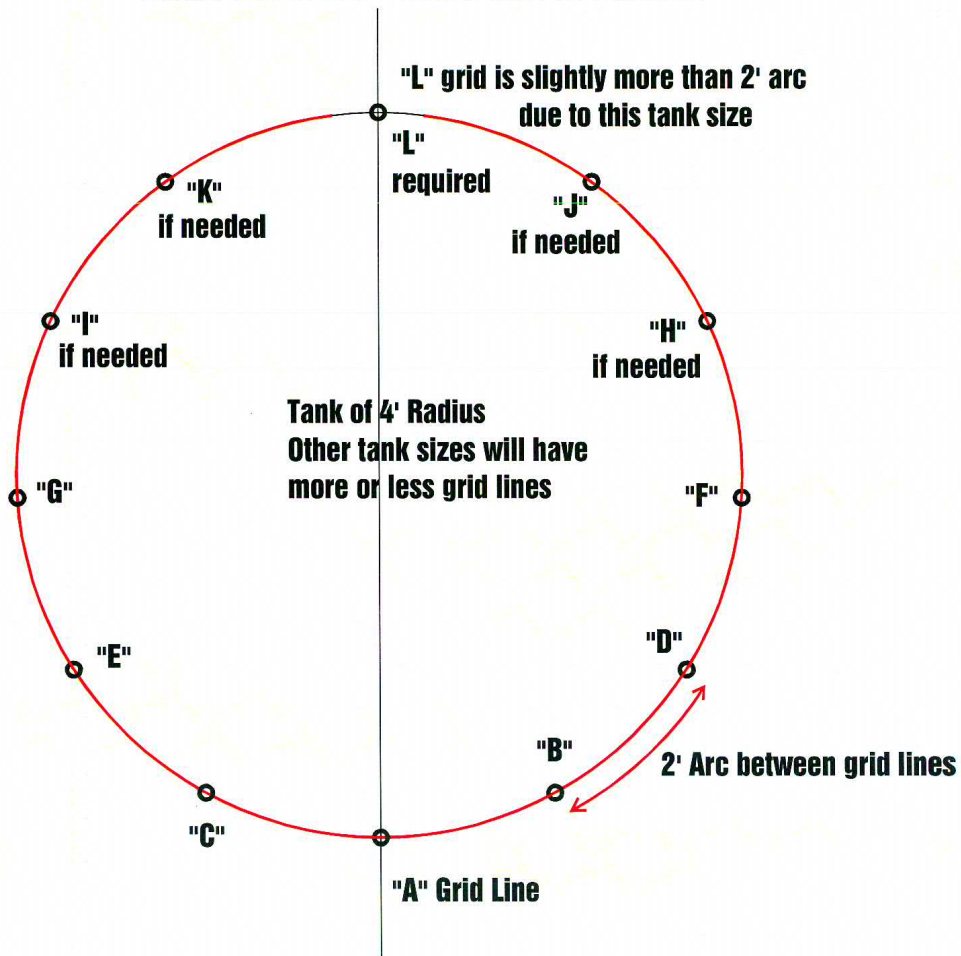
It is expected that the surface of the tanks will have a painted surface to prevent corrosion. The gage shall be adjusted to account for the painted surface. If the gage does not have an adjustment for paint, the gage shall be calibrated by measuring the known thickness of plate steel with and without paint coating. The gage shall be adjusted, if possible to account for the painted surface. If no adjustment can be made to the meter, adjustment to the reading shall be noted on the field test form.

UT measurements shall be concentrated in areas of the shell where corrosion is most likely to be present. The areas of the shell for UT testing are divided into grid lines at approximate arc lengths of 2 feet apart, starting at the bottom of the tank. Where possible, measurements shall be along the longitudinal “A” grid or bottom of the tank. Additional measurements shall be taken along the “B” and “C-C” longitudinal grid line, which are 2 feet from the longitudinal “A” grid and on both sides of the “A” grid. In cases where the “A” grid is not accessible, measurements shall be taken as close to the “A” grid as possible on both sides of the “A” grid. Additional measurements shall be taken on the longitudinal grid line 2-feet away from the first grid line. By example only, grid “C” is the closest a measurement is taken to the preferred grid “A”. The next measurement shall be taken along grid “E”. See attached sketch of the grid lines. The number of measurements taken along any longitudinal grid line is in part determined by the total length of the tank and the number of suspected areas which exhibit signs of corrosion. Normally, these measurements are no greater than 3 feet apart. In addition to measurements taken along the longitudinal axis of the tank shell, two measurements shall be taken on both end plates of the tanks and the top of the tank.

Once test grid points are determined, the tester shall take four measurements within two inches of the specified grid point and record on the field test form. An average of these four measurements shall also be calculated and recorded on the field test form. The tester must be qualified and experienced in the use of the Hitachi HT300 Ultrasonic Digital Thickness Meter. If the tester encounters areas of thin wall thickness, additional readings may be taken to better identify the thin area. The test results will be passed on to the P.E. and the tester will work with the P.E. to determine if the tank should be removed from service, should be repaired, or can continue in service with a designated shell test interval. The SPCC Plan will be then modified accordingly.

For double walled tanks, all liquid will need to be removed from the tank and the testing

Tank Shell Test Grid Lines



Note: Longitudinal measurements along each grid line are no further than 3 feet apart.
Note: Grid lines H, I, J, and K are to be measured if visual inspection shows cause for the measurement.

