



# **SPILL PREVENTION, CONTROL & COUNTERMEASURES PLAN**

San Antonio Airport System  
San Antonio International Airport (SAT)  
9800 Airport Blvd  
San Antonio, Texas 78216

January 2013

## TABLE OF CONTENTS

112.3 (d) - Professional Engineer's Certification .....	1
112.3 (e) - SPCC Plan Location .....	3
112.4 (a) – Amendment of SPCC Plan by the Regional Administrator .....	3
112.5 (b) - Periodic Review of Plan .....	4
112.7 – General Requirements .....	5
112.7 (a)(1) – Conformance .....	5
112.7 (a)(2) – Deviations from Plan Requirements .....	5
112.7(a)(3) – Facility Description.....	6
112.7(a)(4) – Discharge Reporting .....	15
112.7(a)(5) – Discharge Response Procedures.....	15
112.7(b) – Fault Analysis .....	15
112.7(c) – Containment, Diversionary Structures and Equipment.....	15
112.7(d) – Contingency Planning .....	15
112.7(e) – Inspections, Tests, and Records .....	16
112.7(h) – Loading/Unloading .....	22
112.7(i) – Brittle Fracture Evaluation .....	22
112.7(j) – State Rules, Other Programs, Regulations and Requirements.....	23
112.8 (b) – Storage Area Drainage .....	23
112.8 (c) - Bulk Storage Tanks/Secondary Containment .....	24
112.8 (d) - Facility Transfer Operations .....	26

### APPENDICES

APPENDIX A...MANAGEMENT APPROVAL	
APPENDIX B...FACILITY LAYOUT AND SITE PLANS	
APPENDIX C...SECURITY, INSPECTION AND UNLOADING GUIDE - 112.7(a)(3)(ii)	
APPENDIX D...PERSONNEL TRAINING - 112.7(a)(5)	
APPENDIX E...RESPONSE & DISCHARGE CONTAINMENT ACTION - 112.7(a)(5)	
APPENDIX F...TELEPHONE DISCHARGE REPORT FORM - 112.7(a)(4)	
APPENDIX G...GUIDANCE FOR INSPECTION OF ASTs FOR SPCC PLANS	
APPENDIX H...CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST - 112.20(e)	
APPENDIX I...SECONDARY CONTAINMENT CALCULATIONS	
APPENDIX J...INSPECTION SCHEDULE AND REPORT FORMS	
APPENDIX K...UST / AST RECORDS	
APPENDIX L...CONTAINMENT DRAINAGE LOG	
APPENDIX M...TENANT LIST	

## 40 CFR Part 112 - Introduction

Originally published in 1973 under the authority of §311 of the Clean Water Act, the Oil Pollution Prevention regulation sets forth requirements for prevention of, preparedness for, and response to oil discharges at specific non-transportation-related facilities. To prevent oil from reaching navigable waters and adjoining shorelines, and to contain discharges of oil, the regulation requires these facilities to develop and implement Spill Prevention, Control, and Countermeasure (SPCC) Plans and establishes procedures, methods, and equipment requirements (Subparts A, B, and C). In 1990, the Oil Pollution Act amended the Clean Water Act to require some oil storage facilities to prepare Facility Response Plans. On July 1, 1994, the Environmental Protection Agency (EPA) finalized the revisions that direct facility owners or operators to prepare and submit plans for responding to a worst-case discharge of oil (Subpart D).

Following the Floreffe, Pennsylvania oil spill in 1988, EPA formed the SPCC Task Force to examine federal regulations governing oil spills from aboveground storage tanks. The SPCC Task Force recommended that EPA clarify certain provisions in the Oil Pollution Prevention regulation, establish additional technical requirements for regulated facilities, and require the preparation of facility-specific response plans. In response to the Task Force recommendation, EPA proposed revisions to the Oil Pollution Prevention regulation in the 1990s and finalized the amendments in 2002. EPA has since amended the SPCC requirements of the Oil Pollution Prevention regulation to extend compliance dates and clarify and/or tailor specific regulatory requirements.

The objectives of this SPCC Plan are to (1) prevent the occurrence of discharges by the use of sound engineering and management controls where the potential for discharges exist, (2) prevent the discharge of oil and other regulated material into “navigable waters of the United States or adjoining shorelines, or waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act, or affecting certain natural resources,” (3) prevent exposure of personnel and the community, (4) prevent contamination of the environment, and (5) provide an expeditious and effective response to minimize the potential for environmental impact in the event of an oil discharge.

## 112.3 – Requirements to prepare and implement a SPCC Plan

### 112.3 (d) - Professional Engineer's Certification

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 he or his agent has visited and examined the facility in December 2012. 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.

Registered Professional Engineer: \_\_\_\_\_

Signature of Registered Professional Engineer: \_\_\_\_\_

Registration: \_\_\_\_\_ State: \_\_\_\_\_ Date: \_\_\_\_\_

**112.3 (e) - SPCC Plan Location**

A complete copy of this Plan shall be maintained at the facility if the facility is normally attended at least four hours per day or at the nearest field office if the facility is not so attended. This Plan is available to the EPA Regional Administrator for on-site review during normal working hours in the Environmental Stewardship Division Office.

**112.4 – Amendment of SPCC Plan by Regional Administrator****112.4 (a) – Amendment of SPCC Plan by the Regional Administrator**

Whenever your facility has discharged more than 1,000 U.S. gallons of oil in a single discharge as described in 112.1(b), or discharged more than 42 U.S. gallons of oil in each of two discharges, occurring within any twelve month period, you must submit the following information to the Regional Administrator within 60 days:

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

The Regional Administrator may require you to amend this SPCC Plan if he finds that it does not meet the requirements of 40 CFR 112 or that the amendment is necessary to prevent and contain discharges from your facility.

## 112.5 – Amendment of SPCC Plan by Owners or Operators

### 112.5 (a) – Plan Amendments

This SPCC Plan designed for the San Antonio International Airport (SAT) must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge. Examples include commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement or installation of piping systems; construction or demolition that might alter secondary structures; changes of product or service; or revision of standard operation or maintenance procedures. An amendment must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.

### 112.5 (b) - Periodic Review of Plan

The City of San Antonio – Aviation Department must complete a review and evaluation of this SPCC Plan at least once every five years. As a result of this review and evaluation, the City of San Antonio – Aviation Department must amend the SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of review and will significantly reduce the likelihood of a discharge as described in 112.1(b) from the facility. A SPCC amendment must be implemented as soon as possible, but not later than six months following preparation of any amendment. The City of San Antonio – Aviation Department must document the completion of the review and evaluation, and a company officer must sign the statement below. Note: Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer.

“I have completed review and evaluation of the SPCC Plan for the San Antonio International Airport on \_\_\_\_\_, and will (will not) amend the Plan as a result.”

Name: \_\_\_\_\_

Title: \_\_\_\_\_

## 112.7 – General Requirements for SPCC Plans

The City of San Antonio – Aviation Department 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 the City of San Antonio - Aviation Department Management. (Management Commitment is contained in Appendix A).

### 112.7 (a)(1) – Conformance

This SPCC Plan has been designed for the San Antonio International Airport in accordance with applicable requirements of Environmental Protection Agency's (EPA) regulations under 40 CFR Part 112 and state regulations under Chapter 26 of the Texas Water Code and 30 Texas Administrative Code (TAC) Chapter 334. This facility is in conformance with the requirements of 40 CFR Part 112, except for the following deficiencies:

#### *112.7(g)(2) – Flow Valves Locked*

Master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface must have adequate security measures so that they remain in the closed position when in non-operating or non-standby status. The maintenance yard used oil tote does not have a locking mechanism.

#### *112.7(g)(3) – Starter Controls Locked*

The starter controls on each pump shall be locked in the "off" position and located at a site accessible only to authorized personnel when the pump is in non-operating or non-standby status. The maintenance yard used oil tote does not have a locking mechanism.

#### *112.8(b)(1) – Diked Storage Areas (Containment Areas)*

Tanks G3, G4, G6, G7, G10, GT1, GT2, and GT4 through GT6 are single-walled tanks that are not provided with secondary containment. All hydrocarbon tanks must be equipped with an appropriately sized secondary containment.

### 112.7 (a)(2) – Deviations from Plan Requirements

This Plan may deviate from certain requirements of Part 112, except for secondary containment requirements, provided that equivalent environmental protection by some other means of spill prevention, control, or countermeasure is utilized. Tanks GT1, GT4, GT5 and GT6 are scheduled to be replaced with double walled tanks to provide secondary containment. Tanks G3, G4, G6, G7, G10 and GT2 will need to have dikes installed to prevent any leaks from flowing to drainage areas. The maintenance yard used oil tote is in a controlled access facility that is supervised during working hours and is locked outside of business hours.

**112.7(a)(3) – Facility Description**

Owner Information	
Facility Owner:	City of San Antonio – Aviation Department
Facility Owner Address:	9800 Airport Blvd, San Antonio, Texas 78216
Facility Owner Telephone Number:	(210) 207-3450
Operator Information	
Facility Operator:	City of San Antonio – Aviation Department
Facility Name:	San Antonio International Airport (SAT)
Facility Operator Address:	9800 Airport Blvd, San Antonio, Texas 78216
Facility Operator Telephone Number:	(210) 207-3450
Geographical Coordinates:	N 29 <sup>0</sup> 31' 46.50" , W 98 <sup>0</sup> 28' 29.00"
Facility Type:	Air Transportation Facility
NAICS / SIC Code:	488111 / 4581
Hours of Operation:	24 hours/day, 7 days/week, 52 weeks/year
Responsible Individuals	
The individual responsible at this facility to coordinate all efforts to effectively implement this SPCC Plan and required actions as stated within this SPCC Plan	
Name: <b>Steven Southers</b> Title: Environmental Stewardship Division Manager	Office Telephone Number: (210) 207-3402 Mobile Telephone Number: (210) 218-2232
The following individuals shall serve as back-up Contacts in case of the primary contact's absence.	
Name: <b>Candyce Selby</b> Title: Senior Engineer	Office Telephone Number: (210) 207-3518
<i>OR</i>	
Name: <b>Carlos Alonso</b> Title: Airport Maintenance Manager	Office Telephone Number: (210) 207-3511

**San Antonio International Airport (Appendix B contains Facility Layout and Site Plans)****Operation Summary:**

SAT is a public-use airport offering both commercial service and general aviation facilities which is operated by the City of San Antonio, Department of Aviation. As a commercial service facility, SAT provides scheduled airline operations. The general aviation operations include aircraft ranging from small single-engine private aircraft to multi-engine, intercontinental jet transports.

SAT includes a variety of land uses such as:

- Runways;
- Hangars and related maintenance operations;
- Taxiways for aircraft to access the runways;
- Aprons or ramps for aircraft parking;

- Gates and/or terminals providing interface between airside operations and land operations;
- Parking lots; and
- Perimeter roads and airport access roads.

The above listed land uses identified as hangars, ramps, and aprons represent most of the leased tenant facilities at SAT. These tenant facilities occupy a significant portion of the land along the airport perimeter.

SAT is located in north central San Antonio, northeast of the intersection of U.S. Highway 281 North and Interstate Loop 410, and approximately eight miles north of San Antonio's downtown central business district. The elevation of SAT is 809 feet above the National Geodetic Vertical Datum (NGVD).

SAT covers 2,600 acres and is the primary airport serving the city and metropolitan area. SAT has two terminals serving the public. Terminal A (previously Terminal One) was built in 1984 and occupies 395,000 square feet with 16 gates. Terminal B (completed in November 2010) occupies 210,000 square feet and 12 gates.

SAT's primary activity is the management of arriving and departing aircraft. SAT manages all airport property and leases specific tracts to a variety of leaseholders that include but are not limited to commercial airlines, air-cargo handlers, small-aircraft operators, and aviation manufacturing and repair facilities. These tenants are listed in Appendix M.

The primary sources of potential pollution at SAT originate with the various leaseholders and their operations. Activities include the fueling of aircraft and equipment, deicing, fuel storage, aircraft fabrication, maintenance, and repair, cleaning and servicing of aircraft, painting, chemical storage, and waste storage.

### AIR CARGO

Cargo warehouses are located within two Foreign Trade Zones (FTZ). These warehouses are divided into two categories. They are as follows:

- Air Cargo East: 104,000 square feet of warehouse space with 1,112,327 square feet of aircraft apron
- Air Cargo West: 65,280 square feet of warehouse space with 248,144 square feet of aircraft apron.

### RUNWAYS

SAT has two all-weather air carrier runways. Runway 12R/30L is 8,502 feet long and 150 feet wide. Runway 3/21 is 7,505 feet long and 150 feet wide. The airport also has one general aviation runway, Runway 12L/30R, which is 5,519 feet long and 100 feet wide. The aircraft parking area covers 3,836,610 square feet of apron space.

## COMMERCIAL AVIATION

In the year 2010, SAT had an average of 260 daily domestic and international departures and arrivals. Commercial aviation at San Antonio International Airport accounted for a total of 8,034,720 passengers. SAT is serviced by 14 commercial air carriers. These airlines servicing SAT provide non-stop flights to and from 31 non-stop destinations including both domestic and international cities.

## PRIVATE AVIATION

Private and corporate aviation operations include the fueling, servicing, storage, and maintenance of smaller aircraft, flight training, and other operations. From time to time some operators are relocated due to new construction projects at SAT.

## MANUFACTURING

Several aircraft manufacturing and repair facilities are located at the San Antonio International Airport. These manufacturers include, but are not limited to, aircraft manufacturers and aircraft modification companies. A list of these entities is listed in the tenant list.

## PARKING

The airport provides daily, hourly and economy parking for more than 7,076 vehicles, including designated parking for persons with disabilities. In addition, SAT has a cell phone waiting lot located at the western end of the airport, where individuals can wait for arriving passengers free of charge.

## IN-TERMINAL PASSENGER SERVICES

SAT offers its patrons a variety of services including restaurants, gift shops, ATMs, computer plug-ins, game rooms, a chapel and public lavatories.

## FEDERAL INSPECTION STATION

A Federal Inspection Station is located inside Terminal 1, which processes non-stop flight arrivals from international destinations. The station supports operations of the U.S. Department of Immigration and Customs Enforcement as well as U.S. Animal and Plant Health Inspection Service.

1. *Loading and unloading areas (including areas where chemicals and other materials are transferred):* Bulk loading operations, material-dispensing operations, and loading/unloading docks are located throughout SAT. Areas where significant materials are loaded or unloaded are generally located at maintenance buildings and aircraft hangars.

The material dispensed in the largest quantity at SAT is jet fuel. Aircraft are fueled at apron fuel stations located at each aircraft gate position. Refueling of

aircraft using refueling trucks can be performed at any location within the aircraft operation area. Private or corporate aircraft are refueled by privately owned and operated refueling trucks.

Additionally, the loading and unloading of hydrocarbons take place at the SAT backup generators and at the Terminal buildings grease vats/tanks. Backup generators used for emergency power are located at the airport terminal buildings, the parking garages, and airport operation areas (emergency lighting).

Grease traps/tanks are utilized by SAT concession vendors to store used cooking grease/oil until it is picked up for recycling.

2. *Outdoor storage areas:* Outdoor storage areas are located at maintenance facilities throughout SAT. Materials stored outdoors at SAT include jet fuel, gasoline, diesel, used oil, lubricating oil, ethylene glycol, propylene glycol, potassium acetate, and aircraft and vehicle detergents. Ground support equipment (GSE) and vehicles are also parked or stored outdoors at various locations throughout SAT.
3. *Outdoor processing areas:* Airport construction activities are the main areas where processing takes place at SAT. SAT tenants perform services such as freight delivery and handling, aircraft maintenance and repair, fueling services, etc...
4. *Dust producing activities:* Airport construction activities are the main dust producing activities at SAT. On-going construction activities include, but are not limited to the upkeep, maintenance, and new construction of airport facilities such as, hangars, aprons, parking, terminals and tenant facilities.
5. *On-site waste disposal:* Onsite waste disposal varies by activity and tenant. In general, waste oils, antifreeze, degreasing solvents, fuel, paint, paper, plastic, cardboard, scrap tires, pallets, toner cartridges, and batteries are collected and stored onsite in designated areas and then removed for recycling or disposal by properly licensed contractors. SAT operates a solid waste program in which SAT provides tenants with open top containers and/or compactors for disposal of solid waste. A contractor is used for collecting the containers and disposes of the trash at a properly permitted landfill.
6. *Aircraft, Runway, Vehicle/equipment maintenance, cleaning and fueling areas:* Aircraft maintenance and cleaning activities (performed by tenants) generally occur at the aircraft maintenance hangars, East Cargo Area, and West Cargo Area. SAT currently implements a no wash policy effective for all airport tenants. Minor aircraft maintenance activities (e.g., addition of jet engine oil) may also occur at the terminal gates. Ground vehicle and equipment maintenance and cleaning activities may occur outdoors at specified locations on the aprons or in the parking lots. While, most ground vehicle and equipment maintenance and cleaning activities generally occur indoors at specified locations, there are some airport tenants without interior maintenance facilities that conduct minor vehicle and equipment maintenance outdoors.

Runway paint and rubber removal is performed periodically by a subcontractor. The method utilized uses a truck that provides hydroblasting followed by a vacuum. All materials and wastewater generated from these processes are collected during the removal process, analyzed, and appropriately disposed by SAT. The Airport is constantly exploring more economical and environmentally friendlier techniques for these activities.

In order to improve runway traction grinding and grooving is currently performed on an as needed basis on worn runway pavements. The current method utilizes a steel shot blast method. Any generated wastes are collected and appropriately disposed.

7. *Deicing / Anti-icing operations:* Deicing/anti-icing operations protect aircraft from accidents, which can result from ice and snow build-up on aircraft and runways during inclement weather. The deicing/anti-icing season for SAT is generally between November and February. The deicing/anti-icing season may fluctuate based on local weather conditions and other weather conditions around the country.

Aircraft, runways, taxiways, and aprons are deiced or anti-iced at SAT. Aircraft deicing/anti-icing activities are performed by tenants that use ethylene glycol and/or propylene glycol. The ratio of glycol to water in Type I deicing fluid varies from tenant to tenant. Type IV anti-icing fluid is usually applied without dilution. Application ratios vary depending on use and weather conditions. SAT runway, taxiway, and apron anti-icing operations use liquid and/or granular sodium acetate.

8. *Liquid storage tank areas and fueling areas/systems:* Tenant facilities such as: Allied Aviation Fueling Company, Aviation Airstar, Million Air, Nayak Aviation, Landmark Aviation and Signature Flight Support are the primary providers of jet fuel and AV gas at SAT and provide fuels for many of the air freight carriers and airlines operating at SAT. These operations operate bulk fuel storage facilities.

SAT operates a maintenance shop which conducts general equipment and vehicle maintenance along with gasoline/diesel refueling activities. Hydrocarbon storage at the maintenance shop consists of one 10,000-gallon underground diesel tank, one 10,000-gallon underground gasoline tank, one 250-gallon portable used oil tote, one 8-gallon portable used oil/used oil filter crusher, and approximately twenty four 55-gallon drums containing a variety of oils and lubricants.

In addition, SAT operates emergency generators equipped with fuel tanks. These generators are located at the maintenance shop, west cargo, east cargo, ARFF, Terminal 1, Terminal B, and the parking facilities.

Grease traps/tanks are found in both terminal buildings. These traps/tanks are utilized by SAT concession operators for the collection of used/spent cooking oil/grease.

9. *Railroad sidings, tracks, and railcars:* There are no rail sidings, tracks or railcars serving SAT. However, railroad tracks are located along the east side of SAT, along Wetmore Road.

*General:* The facility receives bulk deliveries of fuels and lubricants, by tanker truck, as well as oils in 55-gallon drums delivered by suppliers in commercial motor vehicles.

According to facility personnel, this facility has not experienced a reportable discharge of hydrocarbons for the last three years.

**112.7(a)(3)(i) – Facility Storage Capacity**

Map ID #	Tank ID #	Container Contents	Number of Containers	Capacity (gallons)	Type of Containment	Containment ID	Description & Storage Location
1	G1	DF	One (1)	2,500	N/A, UST	N/A	West Cargo UST Generator Tank
2	G2	DF	One (1)	250	S, B	CT-1	SBT East Cargo AST Generator Tank
3	G3	DF	One (1)	100	S, None	N/A	SBT ARFF AST Generator Tank
4	G4	DF	One (1)	500	S, None	N/A	SBT T-1 Baggage AST Generator Tank
5	G5	DF	OS	OS	OS	OS	SBT Terminal 2 AST Generator Tank
6	G6	DF	One (1)	250	S, None	N/A	SBT Central Plant AST Generator Tank
7	G7	DF	One (1)	50	S, None	N/A	SBT L.T. Parking AST Generator Tank
8	G9	DF	One (1)	800	DW	N/A	SBT Central Plant AST Generator Tank
9	G10	DF	One (1)	150	S, None	N/A	SBT Maintenance AST Generator Tank
10	M1	DF	One (1)	10,000	N/A, UST	N/A	Maintenance UST Tank
11	M2	G	One (1)	10,000	N/A, UST	N/A	Maintenance UST Tank
12	GT1	VO	One (1)	990	S, None	None	TA Grease Tank
13	GT2	VO	One (1)	275	S, None	None	TA Grease Vat
14	GT3	VO	One (1)	600	S, B	CT-2	Gate A7 Grease Tank
15	GT4	VO	One (1)	985	S, None	None	Gate A3 Grease Tank
16	GT5	VO	One (1)	430	S, None	None	Gate A3 Grease Tank
17	GT6	VO	One (1)	435	S, None	None	Gate 14 Grease Tank
18	GT7	VO	One (1)	Unknown	NA, UST	N/A	TB UST Grease Tank
<b>Aboveground Portable Containers</b>							
19	N/A	UO / UOF	One (1)	8.0	None	N/A	Maintenance Shop
20	N/A	UO	One (1)	250	SP	N/A	Maintenance Shop
21	N/A	V	Four (4)	220	C	N/A	Maintenance Shop (South)
22	N/A	V	Varies, up to twenty (20)	1,100	SP, C	N/A	Maintenance Shop Area
23	N/A	V	Varies, up to Ten (10)	550	B	N/A	ARFF
<b>Total Hydrocarbon Storage (gallons):</b>					<b>30,443</b>		

**KEY**

AST = Aboveground Storage Tank  
DF = Diesel Fuel  
N/A = Not Applicable  
SP = Spill Pallet  
UST = Underground Storage Tank

B = Building  
DW = Double-walled Tank  
OS = Out of Service  
UO = Used Oil  
V = Various Oils & Lubricants

C = Curbing  
G = Gasoline  
S = Single-walled Tank  
UOF = Used Oil Filters  
VO = Vegetable Oil Tank

**112.7(a)(3)(ii) – Discharge Prevention Measures**

Discharge prevention measures and procedures for routine handling of products (loading, unloading, and facility transfers, etc.) are detailed in the **Security, Inspection and Unloading Guide** (Appendix C).

**112.7(a)(3)(iii) – Discharge Controls and Secondary Containment**

The following discharge or drainage controls, structures, equipment, and procedures are present to prevent any discharged material from leaving the facility and reaching navigable waters: double-walled tanks, secondary containment and covered storage. Secondary containment calculations to verify the adequacies of the containments are included in this SPCC Plan (Appendix I).

**112.7(a)(3)(iv) – Discharge Countermeasures**

A list of Emergency Contacts and phone numbers is included in this plan and City of San Antonio – Aviation Department personnel are on-call at all times. The personnel have knowledge of equipment and materials necessary to control and clean up a spill. Discharge control equipment on site includes granular absorbent, empty drums, brooms and shovels. These items are maintained in the shop and yard areas. Additional spill cleanup equipment is located within the equipment/aircraft refueling trucks.

**The emergency telephone number for personnel and equipment is**

**(210) 207-3433 (Airport Communications)**  
**(210) 413-4928 (Airport Operations – Ops 202)**

**Management remains on-call during hours when the facility is not in operation.**

**112.7(a)(3)(v) – Disposal of Recovered Material**

Contact the City of San Antonio – Aviation Department management and refer to the discharged material's Material Safety Data Sheet (MSDS) for information detailing proper disposal procedures. Recovered material must be disposed of in accordance with all applicable federal, state and local requirements.

**112.7(a)(vi) – Emergency Contacts**

## Facility Contacts

<b>Name</b>	<b>Title</b>	<b>Office Number</b>	<b>Mobile Number</b>
Airport Communications		(210) 207-3433	
Operations 202			(210) 413-4928
Steven Southers	Environmental Stewardship Manager	(210) 207-3402	(210) 218-2232
Chris Yzaguirre	Senior Environmental Protection Officer	(210) 207-3862	(210) 445-5620
Candyce Selby	Senior Engineer	(210) 207-3518	(210) 872-0725
John Chase	Safety Manager	(210) 207-1656	(210) 213-7860
Ryan Rocha	Airport Operations Manager	(210) 207-3477	(210) 854-8398
Carlos Alonso	Facilities Maintenance Manager	(210) 207-3511	(210) 908-8714
Mark McCarthy	Airfield Maintenance Manager	(210) 207-3538	(210) 908-8668
Oscar Tovar	Airport Maintenance	(210) 207-3555	(210) 296-7284
Chris Reininger	Airport Electrical	(210) 207-3481	(210) 207-3433
Captain Georgia Rakowitz	Airport Fire & Rescue	(210) 207-3474	(210) 207-3433

## Emergency Response Numbers

<b>Agency</b>	<b>Contact Number</b>
State Emergency Response Commission	(512) 463-7727
National Response Center	(800) 424-8802
US EPA Region 6 - Dallas 24 hr	(866) 372-7745
TCEQ 24 hr	(800) 832-8224
TCEQ Region 13 San Antonio	(210) 490-3096
Bexar County LEPC	(210) 335-6975
Bexar County Emergency Management	(210) 335-0300
CHEMTREC	(800) 424-9300
Northeast Methodist Hospital	(210) 297-2000 (General)

## Other Emergency Numbers

<b>Agency</b>	<b>Contact Number</b>
Fire Department, EMS, etc	911
Airport Fire/Rescue	(210) 207-3433
Airport Police	(210) 207-3433

**112.7(a)(4) – Discharge Reporting**

The **Response and Discharge Containment Action Guide** (Appendix E) details discharge response and reporting requirements. The **Telephone Discharge Report Form** (Appendix F) is designed to assure the person reporting the discharge provides accurate and detailed information.

**112.7(a)(5) – Discharge Response Procedures**

Discharge Response Procedures are detailed in the **Response and Discharge Containment Action Guide** (Appendix E).

**112.7(b) – Fault Analysis**

A potential for equipment failure exists during loading of equipment, unloading of equipment, tank overflow, tank rupture, piping rupture, tank leakage, piping leakage, or valve leakage. A site plan is included in this plan (Appendix B) and indicates the probable direction of the spill flow, and an area map that identifies any nearby drainage ways (site flows to Salado Creek and/or Olmos Creek). The Facility Storage Capacity, section 112.7(a)(3)(i) of this plan, lists storage tank capacities that can be used to determine the amount of hydrocarbons that could be discharged.

**112.7(c) – Containment, Diversionary Structures and Equipment**

Appropriate containment and/or diversionary structures or equipment to prevent a discharge must be provided and are detailed in the following sections of this Plan:

- 112.8(b) - Storage Area Drainage;
- 112.8(c) - Bulk Storage Tanks/Secondary Containment; and
- 112.8(c)(11) - Appropriate Position of Mobile or Portable Oil Storage Tanks

**112.7(d) – Contingency Planning**

Not Applicable – this facility utilizes the structures and equipment listed in 112.7(c) to prevent a “discharge” as describe in 112.1(b).

**112.7(e) – Inspections, Tests, and Records**

Inspections and testing (integrity, leak, etc...) of hydrocarbon storage tanks at the San Antonio International Airport will be performed as per the Recommended Inspection Schedule. This schedule and the associated inspection forms are found in Appendix J.

Periodic inspections (monthly/annual) will be performed on tanks, storage containers, and oil-filled operating equipment by the tank owner or his designee. The personnel performing these inspections shall be knowledgeable of storage facility operations, the type of tank or storage container and its associated components, the type of oil-filled operating equipment, and the characteristics of the liquid stored. Monthly and annual inspection records will be kept for a period of three years.

Tank integrity is addressed through Formal Certified Inspections. These inspections must be conducted by a “certified inspector” (i.e., a person who is certified by the American Petroleum Institute (API) or Steel Tank Institute (STI)) as per the Recommended Inspection Schedule found in Appendix J. AST Records, Certified Inspections and Leak Testing will be kept for the life of the facility.

**112.7(f) – Employee Training****112.7(f)(1) – Personnel Instructions**

At a minimum, oil-handling personnel shall be trained in the operation and maintenance of equipment to prevent discharges, discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan (Appendix D).

**112.7(f)(2) – Designated Person Accountable for Discharge Prevention**

Steven Southers, Environmental Stewardship Manager, is the designated person accountable for discharge prevention and reports to facility management.

**112.7(f)(3) – Discharge (Spill) Prevention Briefings**

Discharge prevention briefings, held at least once a year, must be conducted to assure adequate understanding of the SPCC Plan for the facility. These briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures.

**112.7(g) – Security****112.7(g)(1) – Fencing**

Each facility that handles, processes, or stores oil must be fully fenced and the entrance gate must be locked and/or guarded when the facility is not in production or is unattended.

Container	Fencing/Security
G1 – UST West Cargo Generator Tank	UST is located within the fenced Airport Operations Area (AOA). Building is locked when unattended.
G2 – SBT East Cargo AST	Tank is located within a building in the AOA. In addi-

Generator Tank	tion, the building is locked when unattended.
G3 – SBT ARFF AST Generator Tank	Tank is located within the AOA. Access is limited to authorized personnel.
G4 – SBT T-1 Baggage AST Generator Tank	Tank is located within Terminal 1 & AOA. Building is locked when unattended.
G5 – SBT T-2 AST Generator Tank	Tank has been removed.
G6 – SBT Central Plant AST Generator Tank	Area is secured and patrolled by Airport Police and staff.
G7 – SBT L.T. Parking AST Generator Tank	Area is secured and patrolled by Airport Police and staff.
G9 – SBT Central Plant AST Generator Tank	Area is secured and patrolled by Airport Police and staff.
G10 – SBT Maintenance AST Generator Tank	Maintenance Yard is fully fenced and locked when unattended.
M1 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when unattended.
M2 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when unattended.
GT1 – TA Grease Tank	Grease tank is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT2 – TA Grease Vat	Grease vat is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT3 – Gate A7 Grease Tank	Tank is located within the AOA. Access is limited to authorized personnel.
GT4 – Gate A3 Grease Tank	Tank is located within the AOA. Access is limited to authorized personnel.
GT5 – Gate A3 Grease Tank	Tank is located within the AOA. Access is limited to authorized personnel.
GT6 – Gate 14 Grease Tank	Tank is located within the AOA. Access is limited to authorized personnel.
GT7 – TB UST Grease Tank	Tank is located within the AOA. Access is limited to authorized personnel.
Maintenance Yard Portable Container – Used Oil Filter Drain Tank	Maintenance Yard is fully fenced and locked when unattended.
Maintenance Yard – Portable Used Oil Tote	Maintenance Yard is fully fenced and locked when unattended.
Maintenance Yard – Portable Containers – 55 Gallon Drums	Maintenance Yard is fully fenced and locked when unattended.
ARFF – Portable Containers - 55 Gallon Drums	ARFF Building is closed and locked when unattended.

**112.7(g)(2) – Flow Valves Locked**

Master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface must have adequate security measures so that they

remain in the closed position when in non-operating or non-standby status. The table below describes the method of flow valve security for each container.

<b>Container</b>	<b>Flow Valve Security</b>
G1 – UST West Cargo Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G2 – SBT East Cargo AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G3 – SBT ARFF AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G4 – SBT T-1 Baggage AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G5 – SBT T-2 AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G6 – SBT Central Plant AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G7 – SBT L.T. Parking AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G9 – SBT Central Plant AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
G10 – SBT Maintenance AST Generator Tank	Tank is plumbed directly into the generator that it services. There are no flow valves that would allow for the outward flow of the container's contents to the surface.
M1 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when the facility is unmanned. In addition, employees' must enter a proper badge number to activate the fuel pump.
M2 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when the facility is unmanned. In addition, employees' must enter a proper badge number to activate the

	fuel pump.
GT1 – TA Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT2 – TA Grease Vat	No flow valves are present on the vat. Additionally the grease vat is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT3 – Gate A7 Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT4 – Gate A3 Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT5 – Gate A3 Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT6 – Gate 14 Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT7 – TB UST Grease Tank	No flow valves are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
Maintenance Yard Portable Container – Used Oil Filter Drain Tank	Maintenance Yard is fully fenced and is closed and locked when unattended. Drain is operated by an air compressor that is unavailable when facility is unattended.
Maintenance Yard – Portable Used Oil Tote	Maintenance Yard is fully fenced and is closed and locked when unattended. Drain must be locked in the closed position when in non-operating or in non-standby status.
Maintenance Yard – Portable Containers – 55 Gallon Drums	Maintenance Yard is fully fenced and is closed and locked when unattended.
ARFF – Portable Containers - 55 Gallon Drums	Drums are stored within a building that is closed and locked when unattended.

### 112.7(g)(3) – Starter Controls Locked

The starter controls on each pump shall be locked in the “off” position and located at a site accessible only to authorized personnel when the pump is in non-operating or non-standby status. The table below describes the method of starter control security for each container. These areas are accessible to authorized personnel only and are locked when the facilities are unattended.

Container	Starter Control Security
G1 – UST West Cargo Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G2 – SBT East Cargo AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G3 – SBT ARFF AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G4 – SBT T-1 Baggage AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G5 – SBT T-2 AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G6 – SBT Central Plant AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G7 – SBT L.T. Parking AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G9 – SBT Central Plant AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
G10 – SBT Maintenance AST Generator Tank	Tank is plumbed directly into the generator that it services. Fuel is pumped to the generator only when the generator is turned on.
M1 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when the facility is unmanned. In addition, employees' must enter a proper badge number to activate the fuel pump.
M2 – UST Maintenance Tank	Maintenance Yard is fully fenced and locked when the facility is unmanned. In addition, employees' must enter a proper badge number to activate the fuel pump.
GT1 – TA Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT2 – TA Grease Vat	No starter controls are present on the vat. Additionally the grease vat is located within the Basement of Terminal A. Access is limited to authorized personnel.
GT3 – Gate A7 Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.

GT4 – Gate A3 Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT5 – Gate A3 Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT6 – Gate 14 Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
GT7 – TB UST Grease Tank	No starter controls are present on the tank. Additionally the grease tank is located within the AOA. Access is limited to authorized personnel.
Maintenance Yard Portable Container – Used Oil Filter Drain Tank	Maintenance Yard is fully fenced and is closed and locked when unattended. Drain is operated by an air compressor that is unavailable when facility is unattended.
Maintenance Yard – Portable Used Oil Tote	Maintenance Yard is fully fenced and is closed and locked when unattended. Drain must be locked in the closed position when in non-operating or in non-standby status.
Maintenance Yard – Portable Containers – 55 Gallon Drums	Maintenance Yard is fully fenced and is closed and locked when unattended.
ARFF – Portable Containers - 55 Gallon Drums	Drums are stored within a building that is closed and locked when unattended.

#### **112.7(g)(4) – Pipeline Loading/Unloading Connections Securely Capped**

Loading/Unloading connections of oil pipelines or facility piping must be securely capped or blank-flanged when not in service or in standby status for an extended time.

#### **112.7(g)(5) – Lighting Adequate to Detect Spills**

Facility lighting must be provided to assist in the discovery of a discharge during hours of darkness and to prevent discharges due to acts of vandalism.

<b>Container</b>	<b>Lighting</b>
G1 – UST West Cargo Generator Tank	Tank is underground, lighting is not an issue.
G2 – SBT East Cargo AST Generator Tank	Adequate lighting is provided.
G3 – SBT ARFF AST Generator Tank	Tank is located within the AOA and the area is patrolled by Airport Police and staff.
G4 – SBT T-1 Baggage AST Generator Tank	Adequate lighting is provided.
G5 – SBT T-2 AST Generator Tank	Adequate lighting is provided.
G6 – SBT Central Plant AST Generator Tank	Tank location is patrolled by Airport Police and staff.
G7 – SBT L.T. Parking AST	Tank location is patrolled by Airport Police and staff.

Generator Tank	
G9 – SBT Central Plant AST Generator Tank	Adequate lighting is provided.
G10 – SBT Maintenance AST Generator Tank	Tank location is patrolled by Airport Police and staff.
M1 – UST Maintenance Tank	Tank is underground, lighting is not an issue.
M2 – UST Maintenance Tank	Tank is underground, lighting is not an issue.
GT1 – TA Grease Tank	Adequate lighting is provided.
GT2 – TA Grease Vat	Adequate lighting is provided.
GT3 – Gate A7 Grease Tank	Adequate lighting is provided.
GT4 – Gate A3 Grease Tank	Adequate lighting is provided.
GT5 – Gate A3 Grease Tank	Adequate lighting is provided.
GT6 – Gate 14 Grease Tank	Adequate lighting is provided.
GT7 – TB UST Grease Tank	Tank is underground, lighting is not an issue.
Maintenance Yard Portable Container – Used Oil Filter Drain Tank	Adequate lighting is provided.
Maintenance Yard – Portable Used Oil Tote	Adequate lighting is provided.
Maintenance Yard – Portable Containers – 55 Gallon Drums	Adequate lighting is provided.
ARFF – Portable Containers - 55 Gallon Drums	Adequate lighting is provided.

### **112.7(h) – Loading/Unloading**

Loading/Unloading Procedures Meet DOT Regulations: City of San Antonio – Aviation Department requires drivers to comply with State and Federal regulations as well as facility standard operating procedures.

### **112.7(h)(1) – Secondary Containment for Vehicles Adequate**

Not Applicable – The facility’s loading and offloading areas do not meet the definition of a “loading/unloading rack”.

### **112.7(h)(2) – Warning or Barrier System for Vehicles**

Not Applicable.

### **112.7(h)(3) – Vehicles examined for lowermost drainage outlets before leaving**

Not Applicable

### **112.7(i) – Brittle Fracture Evaluation**

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, the container must be evaluated for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, appropriate action taken.

**112.7(j) – State Rules, Other Programs, Regulations and Requirements**

This plan has been designed for the City of San Antonio – Aviation Department's San Antonio International Airport in accordance with applicable requirements of regulations under 40 CFR Part 112, Chapter 26 of the Texas Water Code and 30 TAC Chapter 334.

In addition, the following required Plans and/or Programs are available at San Antonio International Airport.

- (1) *Emergency Response and Evacuation Plan* – This plan outlines the procedures to be followed in the event of an emergency and is consistent with this SPCC Plan.
- (2) *Material Safety Data Sheets (MSDS)* - The MSDS files contains information on the chemical substances that are used, handled, or stored at the facility. The MSDSs include information on proper use, storage, and response to spill/releases for these substances.
- (3) *Hazard Communication Program* - This Program identifies chemical compounds and materials which are used in the operations of the facility which may present health hazard or risk of injury for employees. This program includes: training requirements; identifies levels of exposure which may be present; and provides recordkeeping requirements.
- (4) *Aboveground Storage Tank Registration* - 30 TAC Chapter 334, Subchapter F §334.127 requires that all aboveground storage tanks with a capacity of 1,100 gallons or more that stores a petroleum product capable of propulsion of a motor vehicle or aircraft must be registered with the TCEQ within 30 days from the date any petroleum product is first placed into the tank.
- (5) *National Fire Protection Association (AST Decals)* - All appropriate warnings, such as the National Fire Protection Association (NFPA) decals/markings, should be displayed on the sides of the aboveground storage tanks (AST) containing flammable and combustible liquid products.

**112.8 – SPCC Plan requirements for onshore facilities****112.8 (b) – Storage Area Drainage****112.8(b)(1) – Diked Storage Areas (Containment Areas)**

Tanks G1, M1, M2 and GT7 are fiberglass underground tanks.

Tanks G3, G4, G6, G7, G10, GT1, GT2, and GT4 through GT6 are single-walled tanks that are not provided with secondary containment. Tanks GT1, GT4, GT5 and GT6 are scheduled to be replaced with double walled tanks to provide secondary containment. Tanks G3, G4, G6, G7, G10 and GT2 will need to have dikes installed to allow for secondary containment.

Tank G2 is a single-walled tank that is equipped with building secondary containment. Discharges from the tank will flow into and be captured by the walls and floor of the building in which it is located.

Tank G5, Terminal 2 generator diesel tank is out of service and has been removed.

Tank G9 is a double-walled diesel tank. Discharges from the tank will flow into the interstices of the tank that constrain it.

Tank GT3 is a single-walled tank that is equipped with building secondary containment. Discharges from the tank will flow into and be captured by the walls and floor of the building in which it is located.

**112.8(b)(2) – Valves on Diked Storage Areas**

Valves of manual, open-and-closed design must be used for the drainage of diked areas. The exterior drainage valve is equipped with a locking device and may be unlocked and opened to drain accumulated precipitation in accordance with the Containment Drainage Log (Appendix L)

**112.8(b)(3) – Facility Drainage Systems from Undiked Areas**

The areas around the airport, equipment parking, fueling areas and maintenance areas are contoured so any waters spilling upon the site could flow off site.

**112.8(b)(4) – Final Discharge of Drainage**

This section is not applicable. Operating areas are engineered so that any discharge will be controlled on site.

**112.8(b)(5) – Drainage Waters Treatment Systems**

There is no pump controlled drainage water treatment system at this facility.

**112.8 (c) - Bulk Storage Tanks/Secondary Containment**

**112.8(c)(1) – Tank Compatibility with Its Contents**

Hydrocarbon aboveground containers on site are constructed of welded steel, fiberglass or plastic and are compatible with the material stored and conditions of storage such as pressure and temperature.

**112.8(c)(2) – Secondary Containment Construction**

Tank G2 is a single-walled tank that is equipped with building secondary containment. The flooring and walls of the building is constructed of steel and concrete and is sufficiently impervious to diesel.

Tank GT9 is a double-walled diesel tank. The flooring, walls and roof of AST G9 is constructed of steel and is sufficiently impervious to diesel.

Tank GT3 is a single-walled tank that is equipped with building secondary containment. The flooring and walls of the building is constructed of steel, concrete and wood and is sufficiently impervious to diesel.

**112.8(c)(3) – Secondary Containment, Inspection and Drainage of Rainwater**

Rainwater from inside secondary containments must be removed as soon as practicable by draining the rainwater or is allowed to evaporate and may be pumped out by a licensed recycler if needed.

If rainwater is to be drained from the secondary containment, the following procedures must be met:

- Valves are normally sealed closed.
- Retained rainwater must be inspected to ensure that its presence will not cause a “discharge”.
- The valve is opened and resealed under responsible supervision.
- Records of each drainage event are kept in Appendix L.

#### **112.8(c)(4) – Corrosion Protection of Buried Metallic Storage Tanks**

There are no buried metallic tanks at San Antonio International Airport. The three (3) underground storage tanks on site are constructed of fiberglass.

#### **112.8(c)(5) – Corrosion Protection of Partially Buried Metallic Tanks**

There are no partially buried metallic tanks at San Antonio International Airport.

#### **112.8(c)(6) – Aboveground Tank Periodic Inspection/Testing**

Periodic Inspections, Leak Testing, and Formal Certified Inspections for Shop Fabricated Tanks, Portable Containers, and Field-Erected Tanks will be performed and documented in accordance with Guidance for the Inspection of Aboveground Storage Tanks for SPCC Plans, attached as Appendix G. A Recommended Inspection Schedule is included as Appendix J.

Aboveground tanks will be inspected and will be integrity tested on a regular schedule and whenever material repairs are made. The Recommended Inspection Schedule takes into account the container size and design, as described on the AST Record, attached as Appendix K.

Tanks will be visually inspected daily when personnel are on site and appropriate corrective action is taken if necessary.

Periodic inspections (monthly/annual) will be performed on tanks, storage containers, and oil-filled operating equipment by the tank owner or his designee. The personnel performing these inspections shall be knowledgeable of storage facility operations, the type of tank or storage container and its associated components, the type of oil-filled operating equipment, and the characteristics of the liquid stored. Monthly and annual inspection records will be kept for a period of three years.

Formal Certified Inspections must be conducted by a “certified inspector” as per the Recommended Inspection Schedule found in Appendix J. AST Records, Certified Inspections and Leak Testing will be kept for the life of the facility.

#### **112.8(c)(7) – Control of Leakage through Internal Heating Coils**

There are no tanks or containers equipped with internal heating coils at this facility.

**112.8(c)(8) – Tank Installation Fail-Safe Engineered**

Overfilling of tanks is prevented by personnel checking tank levels prior to filling and verifying that there is sufficient available volume for filling. In addition, each tank is visually monitored as it is being filled.

**112.8(c)(9) – Observation of Disposal Facilities for Effluent Discharge**

There are no facility effluents systems that discharge into navigable waters at this facility.

**112.8(c)(10) – Visible Oil Leak Correction from Tank Seams, Gaskets, Piping and Pumps**

Visible discharges which result in a loss of oil from a container, including: seams, gaskets, piping, pumps, valves, rivets and bolts, must be promptly corrected. Any accumulation of discharged oil must be promptly removed.

**112.8(c)(11) – Appropriate Position of Mobile or Portable Oil Storage Tanks**

Mobile or portable oil storage containers with capacities  $\geq$  55-gallons must be furnished with a secondary means of containment. A secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation must be provided.

The portable used oil tote and used oil filter drain tank, located at the maintenance shop must be equipped with appropriate secondary containment.

Mobile equipment with tanks 55-gallons or larger are parked such that, in the event of a discharge, they would be contained on site.

Inventory and “In use” drums are stored together at ARFF, within a building secondary containment and out of the way of any facility traffic.

Inventory and “In use” drums should be stored together at the maintenance shop, within secondary containment and out of the way of any facility traffic. The maintenance shop utilizes a concrete secondary containment curb for the drums stored on the south side of the shop. This containment is large enough to contain the four 55-gallon drums that are stored within it (110%) and is covered. Additionally, any drums not stored within the containment curb are stored on plastic spill pallets.

Aircraft refuelers are owned and operated by one of SAT tenants, such as Allied Aviation or Landmark Aviation. These refueling companies equip their refuelers with spill response equipment in the event of a spill or leak. Additionally, the airlines and/or tenant receiving fuel maintain spill containment equipment on site.

**112.8 (d) – Facility Transfer Operations****112.8(d)(1) – Buried Piping Installation Protection and Examination**

Buried piping is located at the West Cargo Generator (G1) and at the two underground storage tanks (M1 & M2) located at the maintenance yard. All piping is double-walled and made of fiberglass-reinforced plastic.

**112.8(d)(2) – Not-In-Service and Standby Service Terminal Connections**

The terminal connections at the transfer points must be capped or blank-flanged and marked as to its origin when piping is not in service or is in standby service for an extended time.

**112.8(d)(3) – Pipe Supports Design**

Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.

**112.8(d)(4) – Aboveground Valve, Piping and Appurtenances Inspection**

Valves, piping, and appurtenances will be inspected monthly. This inspection is documented on the SPCC - Monthly Inspection Report Form (Appendix I).

**112.8(d)(5) – Aboveground piping protection from vehicular traffic**

No aboveground pipes are situated where vehicles travel.

## APPENDIX A

### MANAGEMENT APPROVAL

The City of San Antonio – Aviation Department 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 City of San Antonio – Aviation Department management. The City of San Antonio – Aviation Department has committed the necessary resources (manpower, equipment, and materials) necessary to expeditiously control and remove any quantity of oil discharged and to implement the measures described in this Plan.

The Environmental Stewardship 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.

\_\_\_\_\_  
Frank Miller  
Authorized Facility Representative

\_\_\_\_\_  
Aviation Director  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## **APPENDIX B**

### **FACILITY LAYOUT & SITE PLANS**

## APPENDIX C

### SECURITY, INSPECTION AND UNLOADING GUIDE - 112.7(a)(3)(ii)

1. The storage tanks are to be periodically inspected in accordance with the attached Guidance for the Inspection of Aboveground Storage Tanks for SPCC Plans, attached as Appendix G. The records of these inspections will be kept in the SPCC Plan and maintained for a period of three years.
2. The storage tanks may be periodically subjected to Formal Certified Inspections and Leak Tests in accordance with the Guidance for the Inspection of Aboveground Storage Tanks for SPCC Plans, attached as Appendix G. Records of these inspections and tests will be kept with the SPCC Plan and maintained for the life of the facility. The periodic tank inspection reports are kept at the City of San Antonio Fleet Division office.
3. Any signs of failure to the tanks, valves or related equipment, will be corrected immediately.
4. Valves that would permit direct outward flow of oil or chemicals from the tanks are to be securely locked in the closed position when they are in a non-operating or non-standby status.
5. The starters of pumps are to be accessible only to authorized personnel and will be locked in the OFF position when the pumps are in non-operating or non-standby status.
6. When the facility is unattended, all entrance gates will be locked or guarded.
7. Hydrocarbon storage areas have lighting commensurate with the facility type and that is sufficient for the discovery of any hydrocarbon discharged during the hours of darkness.
8. Facility employees will be instructed to watch for oil discharges (spills) and are to be knowledgeable of the facility's reporting and containment requirements.
9. The facility shall conduct discharge prevention briefings on a periodic basis. These briefings can be held in conjunction with the regularly scheduled safety meetings.
10. The Environmental Stewardship Manager is the designated person accountable for oil and chemical discharge prevention at this operation.
11. Unloading procedures shall meet the minimum requirement and regulations established by the Department of Transportation.

## **APPENDIX D**

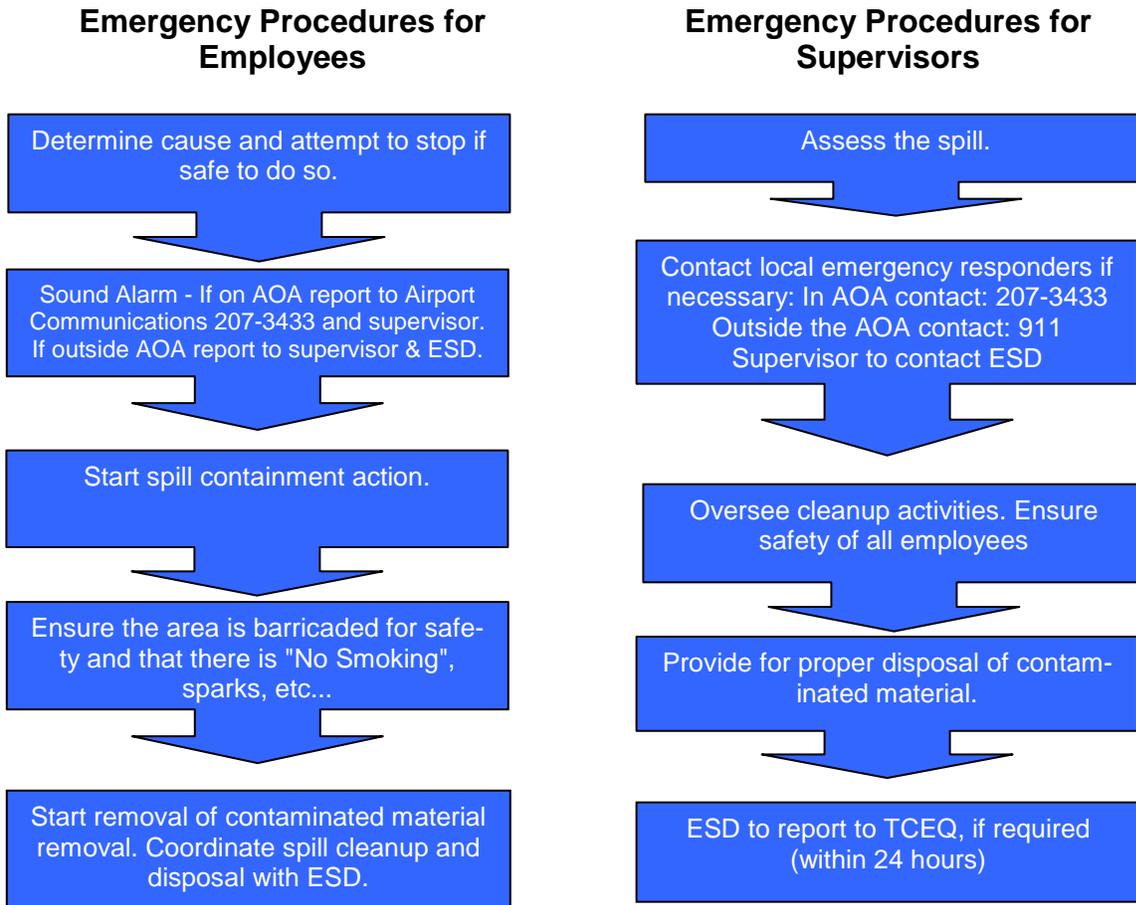
### **EMPLOYEE TRAINING - 112.7(f)(1)**

Mandatory Training for all oil-handling personnel includes: the operation and maintenance of equipment to prevent the discharge of oil, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations and the contents of the facility's SPCC Plan.



## APPENDIX E

### RESPONSE AND CONTAINMENT ACTION - 112.7(a)(5)



Refer to discharged material's MSDS for information regarding discharge (spill) response, clean up, and proper disposal.

Upon the determination that a spill incident meets *any* of the following criteria, **it must be reported to the TCEQ** as soon as possible but **not later than 24 hours after the discovery of the spill or discharge**.

1. The fuel discharge is from or suspected to be from underground plumbing.
2. The fuel discharge exceeds 25 gallons from a fuel dispensing system or from an aboveground fuel storage tank.
3. Any discharge that is not contained on the premise or it has entered a body of water.
4. The cleanup cannot be accomplished within 24 hours.
5. Any oil discharge that exceeds 25 gallons.

## **APPENDIX F**

### **TELEPHONE DISCHARGE REPORT FORM - 112.7(a)(4)**

## APPENDIX F

TELEPHONE DISCHARGE REPORT FORM - 112.7(a)(4)			
Company Name:		Facility Name:	
Address:		Telephone Number:	
Date of Incident:		Time of Incident:	
Facility Location:			
Material Discharged:		Quantity discharged:	
Source of discharge:			
Affected media:			
Cause of discharge:			
Damages or injuries:			
Authorities/Organizations Notified:			
Actions taken to stop, remove, and mitigate the discharge:			
Will an evacuation be necessary?	<input type="checkbox"/>	Yes	<input type="checkbox"/>
		No	Check one
Corrective measures taken to prevent reoccurrence:			
Notes:			
Contact Name:		Signature:	

## **APPENDIX G**

# **GUIDANCE FOR THE INSPECTION OF ABOVEGROUND STORAGE TANKS FOR SPCC PLANS**

## APPENDIX H

### CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA - 112.20(e)

Company Name: City of San Antonio – Aviation Department  
 Facility Name: San Antonio International Airport  
 Facility Address: 9800 Airport Blvd, San Antonio, Texas 78216

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 enough 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<sup>1</sup>) 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<sup>1</sup>) such that a discharge<sup>2</sup> from the facility would shut down a public drinking water intake<sup>2</sup>?

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.

Frank Miller  
Name

\_\_\_\_\_  
Signature

Aviation Director  
Title

\_\_\_\_\_  
Date

From 40 CFR 112 Appendix C, Attachment C-II

<sup>1</sup>If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup>For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

## **APPENDIX I**

### **SECONDARY CONTAINMENT CALCULATIONS**

## **APPENDIX J**

### **RECOMMENDED INSPECTION SCHEDULE AND INSPECTION REPORT FORMS**

**(See SPCC Inspection Log for completed Monthly and Annual inspections)**

**APPENDIX K**  
**UST / AST RECORDS**





**APPENDIX M**  
**TENANT LIST**

**EMERGENCY CONTACTS**

<i>San Antonio International Airport Contacts</i>			
<b>Name</b>	<b>Title</b>	<b>Office Number</b>	<b>Mobile Number</b>
Airport Communications		(210) 207-3433	
Operations 202			(210) 413-4928
Steve Southers	ESD Manager	(210) 207-3402	(210) 218-2232
Chris Yzaguirre	Senior Environmental Protection Officer	(210) 207-3862	(210) 445-5620
Candyce Selby	Senior Engineer	(210) 207-3518	(210) 872-0725
John Chase	Safety Manager	(210) 207-1576	(210) 213-7860
Carlos Alonso	Facilities Maintenance Manager	(210) 207-3511	(210) 908-8714
Mark McCarthy	Airfield Maintenance Manager	(210) 207-3538	(210) 908-8668
Oscar Tovar	Maintenance	(210) 207-3555	(210) 296-7284
Ryan Rocha	Airport Operations Manager	(210) 207-3477	(210) 854-8398
Chris Reininger	Airport Electrical	(210) 207-3481	(210) 207-3433
Captain Georgia Rakowitz	Airport Fire & Rescue	(210) 207-3474	(210) 207-3433
<i>Emergency Response Numbers</i>			
<b>Agency</b>		<b>Contact Number</b>	
State Emergency Response Commission		(512) 463-7727	
National Response Center		(800) 424-8802	
US EPA Region 6 - Dallas 24 hr		(866) 372-7745	
TCEQ 24 hr		(800) 832-8224	
TCEQ Region 13 San Antonio		(210) 490-3096	
Bexar County LEPC		(210) 335-6975	
Bexar County Emergency Management		(210) 335-0300	
CHEMTREC		(800) 424-9300	
<i>Other Emergency Numbers</i>			
<b>Agency</b>		<b>Contact Number</b>	
Fire Department, EMS, etc		911	
Airport Police		(210) 207-3433	
Northeast Methodist Hospital (general)		(210) 297-2000	
Airport Fire/Rescue		(210) 207-3433	

**Emergency Procedures for Employees**



**Emergency Procedures for Supervisors**

