

OWNER

SPCC Plan Framework for T-101

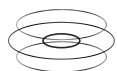


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ISSUE SUMMARY AND APPROVAL

This page records each issue of REG-RPT-004. The preparer, reviewer and approver sign for each revision.

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CONTENTS

1.	INTRODUCTION	1
1.1.	PURPOSE.....	1
1.2.	SCOPE AND EXCLUSIONS	1
2.	APPLICABILITY	2
2.1.	OIL AND JURISDICTION.....	2
2.2.	STORAGE CAPACITY	2
2.3.	REASONABLE EXPECTATION OF DISCHARGE	3
2.4.	TIER I QUALIFIED FACILITY	3
2.5.	FACILITY RESPONSE PLAN	3
3.	SECONDARY CONTAINMENT FOR T-101	4
3.1.	CRITERIA	4
3.2.	INPUTS	4
3.3.	CALCULATION.....	4
3.4.	OTHER DISCHARGE PREVENTION MEASURES	5
3.5.	OVERFILL PREVENTION.....	6
4.	PLAN CONTENT.....	7
5.	INSPECTIONS, TRAINING AND RESPONSE.....	8
5.1.	INSPECTIONS.....	8
5.2.	TRAINING	8
5.3.	SPILL RESPONSE	9
6.	CONCLUSIONS AND NEXT STEPS	10

FIGURES AND TABLES

Table 2-1: Oil Storage Containers	2
Table 2-2: Tier I Qualified Facility Test.....	3
Table 3-1: Containment Inputs	4
Table 3-2: Containment Wall Height	5
Table 3-3: Other Discharge Prevention Measures.....	5
Table 4-1: Tier I Plan Content.....	7
Table 5-1: Inspection and Testing Program	8
Table 5-2: Training	8
Table 6-1: Design Requirements and Where They Are Carried.....	10



APPENDICES

APPENDIX A. PLOT PLAN 11

1. INTRODUCTION

1.1. PURPOSE

This report sets out the framework of the Spill Prevention, Control, and Countermeasure (SPCC) plan that the Owner shall prepare and implement under 40 CFR Part 112 before liquids tank T-101 receives oil. It shows that the rule applies, confirms that the station is a Tier I qualified facility, verifies the size of the T-101 secondary containment, and lists the plan content, inspections, training and response provisions that the plan shall contain.

1.2. SCOPE AND EXCLUSIONS

The design documents implement the engineering requirements stated here: the T-101 datasheet MEC-DS-004, the containment design note CIV-RPT-003, the foundation design STR-CAL-002 and the P&IDs. The plan itself, with facility-specific contacts and procedures, will be completed by the Owner on the EPA Tier I template (Appendix G to Part 112). Oil-filled equipment owned by the electric cooperative, such as transformer XF-101, is the cooperative's responsibility and is excluded.

2. APPLICABILITY

2.1. OIL AND JURISDICTION

T-101 stores hydrocarbon liquids (condensate, lubricating oil carried over from upstream compression, and pigging liquids) and produced water from filter separator V-101 and pig receiver PR-101. Condensate and lubricating oil are oil as defined in 40 CFR 112.2. Although the pipeline is regulated by the Department of Transportation, a storage tank at a pipeline facility that is not used for transportation-related transfer is a non-transportation-related facility under the EPA and DOT memorandum of understanding, and falls within EPA's SPCC jurisdiction (TBV).

The station is downstream of the Owner's treating facility and has no wells or production separation, so it is not an oil production facility. TORUS therefore based the framework on 40 CFR 112.7 and 112.8, which cover onshore facilities other than production facilities. The Tier I template covers either case if the Owner later chooses to manage the station with its production facilities.

2.2. STORAGE CAPACITY

Containers of 55 gal shell capacity or more count toward the 1,320 gal aggregate threshold of 40 CFR 112.1(d)(2). Table 2-1 lists every container on the station. Only T-101 and the lubricating oil drum allowance count.

Table 2-1: Oil Storage Containers

Container	Shell capacity, gal	Counted	Basis
T-101 liquids tank, API 12F, 9 ft 6 in OD x 8 ft (567 ft ³)	4,241	Yes	MEC-DS-004 (HOLD H-15)
Lubricating oil drums, allowance of 2 x 55 gal	110	Yes	Owner to confirm (RH-17)
G-101 engine crankcase	About 3	No, under 55 gal	Typical (HOLD H-15)
V-101 sump, a pressurized flow-through process vessel	About 30	No, under 55 gal	Typical (HOLD H-15)
Electro-hydraulic actuator reservoirs	2 to 6 each	No, under 55 gal	Typical
H-101 water bath	None	No, water and inhibited glycol, not oil	MEC-LST-002
XF-101 transformer	None	No, owned by the cooperative	
Aggregate counted	4,351		

The aggregate is 4,241 + 110 = 4,351 gal, which exceeds 1,320 gal.

2.3. REASONABLE EXPECTATION OF DISCHARGE

The site drains by overland flow and roadside ditches toward tributaries of the Washita or system (CIV-CAL-002; the receiving water will be named in the stormwater pollution prevention plan). A release from T-101 could reach a tributary in a storm, and neither distance nor topography allows the Owner to exclude the facility. The SPCC rule therefore applies.

2.4. TIER I QUALIFIED FACILITY

Table 2-2 tests the station against the qualified facility criteria of 40 CFR 112.3(g). The station meets the Tier I criteria of 112.3(g)(1), so the Owner may self-certify the plan on the Appendix G template under 112.6(a), without certification by a Professional Engineer.

Table 2-2: Tier I Qualified Facility Test

Criterion	Limit	Station	Met
Aggregate aboveground oil storage	10,000 gal or less	4,351 gal	Yes
Largest individual aboveground container	5,000 gal or less	4,241 gal, T-101	Yes
Discharge history in the three years before self-certification	No single discharge over 1,000 gal, and no two discharges each over 42 gal within 12 months	New facility, none	Yes

If the Owner later adds a container larger than 5,000 gal, the station becomes a Tier II facility, and a Professional Engineer shall certify any environmentally equivalent measure or impracticability determination. Above 10,000 gal aggregate, a fully engineer-certified plan is required.

2.5. FACILITY RESPONSE PLAN

A facility response plan under 40 CFR 112.20 is needed only for a facility that transfers oil over water with 42,000 gal or more of capacity, or that has 1,000,000 gal or more. At 4,351 gal with no transfers over water, the station is far below both. The Owner shall record the Appendix C substantial harm certification in the plan.

3. SECONDARY CONTAINMENT FOR T-101

3.1. CRITERIA

40 CFR 112.8(c)(2) requires secondary containment for the entire capacity of the largest container plus sufficient freeboard for precipitation. The Owner's standard, adopted here, is more conservative: 110 % of the largest container, plus the 25-year, 24-hour rainfall, plus 6 in of freeboard. The containment is 24 x 24 ft inside, between plot coordinates X 18 to 42 and Y 88 to 112, with T-101 at its center, (30, 100) on MEC-DWG-001 (Appendix A). It shall be impervious enough to hold oil until cleanup. Its drain valve, if any, shall be manual, normally closed and locked, and opened only after the retained water has been checked for sheen (112.8(c)(3)).

3.2. INPUTS

Table 3-1 lists the inputs to the containment check.

Table 3-1: Containment Inputs

Input	Value	Source
Largest container	4,241 gal (567 ft ³)	MEC-DS-004 (HOLD H-15)
Containment inside dimensions	24 x 24 ft	MEC-DWG-001
25-year, 24-hour rainfall	6.33 in	CIV-CAL-002, from NOAA Atlas 14 Volume 8 (TBV at final coordinates, HOLD H-02)
Tank diameter	9.5 ft	MEC-DS-004
Tank pad height above the containment floor	0.5 ft	Typical ring pad
Freeboard	0.5 ft	Owner practice
Specified wall height	30 in (2.50 ft) above the floor	STR-CAL-002, CIV-RPT-003

3.3. CALCULATION

The required volume is 110 % of the tank, plus the rainfall on the whole containment area, plus the volume displaced by the tank pad. The shell of the failed tank is not deducted, because the liquid it contains is the released liquid; the pad under it is deducted. Any other equipment placed inside the containment would add its own displacement.

$$V_{110} = \frac{1.10 \times 4,241}{7.4805} = 623.7 \text{ ft}^3$$

$$V_{rain} = 576 \times \frac{6.33}{12} = 303.8 \text{ ft}^3, \quad V_{pad} = \frac{\pi}{4}(9.5)^2(0.5) = 35.4 \text{ ft}^3$$

$$V_{req} = 623.7 + 303.8 + 35.4 = 963.0 \text{ ft}^3, \quad h_{liq} = \frac{963.0}{576} = 1.67 \text{ ft}$$

With 0.5 ft of freeboard, the required wall height is 2.17 ft (26 in). The civil design note CIV-RPT-003 uses a more conservative method, deducting the whole tank footprint from the floor area: the net area is $576 - 70.9 = 505.1 \text{ ft}^2$, the liquid height is $(623.7 + 303.8) / 505.1 = 1.84 \text{ ft}$, and the wall height with freeboard is 2.34 ft (28 in).

At the specified 30 in wall, the net capacity is $576 \times 2.5 - 35.4 = 1,405 \text{ ft}^3$, or 10,510 gal, which is 248 % of the T-101 shell capacity. With 110 % of the tank held and 6 in of freeboard kept, the containment can absorb 10.3 in of rain, against 6.33 in for the 25-year, 24-hour storm.

Table 3-2 compares the two methods with the specified wall.

Table 3-2: Containment Wall Height

Method	Required volume, ft ³	Liquid height, ft	Wall with freeboard, ft	Specified wall, ft
Pad displacement deducted	963.0 on 576 ft ²	1.67	2.17	2.50
Tank footprint deducted (CIV-RPT-003)	927.5 on 505.1 ft ²	1.84	2.34	2.50

The specified 30 in wall is adequate by either method, and it is adopted.

3.4. OTHER DISCHARGE PREVENTION MEASURES

Table 3-3 sets out the measures for the other places where oil could be released.

Table 3-3: Other Discharge Prevention Measures

Location	Measure	Rule
Truck loadout	No loading rack is planned, so 112.7(h) does not apply. Liquids are limited to 350 bbl/yr by the enforceable throughput limit of REG-CAL-001, and 52 to 260 bbl/yr is expected from pigging, so about one to five truck loadouts a year are expected; each load ticket also serves as the throughput record. As good practice: connection over the containment wall, drip pan or curbed pad for hose drain-down, dry-disconnect coupling, wheel chocks and a warning sign against departure before disconnection, spill kit	112.7(c)
Piping to T-101 (3 in line 1060 and 2 in line 1061, Class 150, 285 psig design)	Above grade on supports from V-101 and PR-101 to the tank inlet manifold, with no buried oil piping; visible for the monthly inspection; tank valves locked when not in use	112.8(d)
V-101 liquid dump	SDV-106, a fail-closed electric valve, closes on V-101 low-low level or T-101 high-high level through the safety PLC and on station shutdown; restriction orifice RO-104 limits gas blow-by, which emergency vent EV-193 and PVRV-193 relieve; LCV-104 runs on the uninterruptible power supply	112.8(c) (8)

Location	Measure	Rule
VS-101 base drain	Plugged 2 in drain valve over a portable collection pan, emptied by vacuum truck and inspected monthly with the tank	112.7(c)
Drums	On a spill pallet, or inside B-102 with containment for the largest drum	112.8(c) (11)
Actuator reservoirs, G-101	Oil-filled operational equipment under 55 gal: spill kit and inspection	112.7(c)

3.5. OVERFILL PREVENTION

T-101 shall have at least two of the overfill prevention methods of 40 CFR 112.8(c)(8). The design provides three: radar level transmitter LT-191 with a high alarm to SCADA and the Owner's gas control; high-high level switch LSHH-192, independent of LT-191, which closes SDV-106 through the safety PLC, closes LCV-104 and alarms; and a local level gauge read before and during manual draining of PR-101 and during loadout. Manual draining of PR-101 to T-101 shall be attended at all times.



4. PLAN CONTENT

Table 4-1 lists the sections the Owner shall complete on the Tier I template.

Table 4-1: Tier I Plan Content

Plan element	Content	Rule
Self-certification	The Owner's authorized representative certifies the Tier I criteria and that the plan is implemented	112.6(a)
Facility information	Name, location (HOLD H-02), Owner, emergency contacts, 24 hour number	112.7(a)(3)
Oil storage table	Table 2-1, with contents	112.7(a)(3)(i)
Facility diagram	Plot plan showing T-101, containment, loadout, drainage direction, drum storage and piping to T-101 (Appendix A)	112.7(a)(3)
Discharge prevention	Loadout procedure, attended PR-101 drains, overfill protection	112.7(a)(3)(ii)
Drainage and containment	Containment drain locked closed; drainage records	112.7(c), 112.8(b), 112.8(c)(3)
Countermeasures and disposal	Spill kit contents; disposal of recovered oil per REG-RPT-003	112.7(a)(3)(iv) and (v)
Contacts and notification	National Response Center (1-800-424-8802), , Department of Environmental Quality, fire district, Owner environmental staff; report to the EPA Regional Administrator within 60 days of a discharge over 1,000 gal, or of two discharges over 42 gal each within 12 months	112.7(a)(4) and (5), 112.4
Inspections and tests	Table 5-1	112.7(e), 112.8(c)(6)
Training	Table 5-2	112.7(f)
Security	Fence, locked gates, locked tank valves and containment drain, lighting	112.7(g)
Brittle fracture	Not applicable; T-101 is shop built	112.7(i)
Review	At least every five years, and an amendment within six months of any change affecting discharge potential	112.5

5. INSPECTIONS, TRAINING AND RESPONSE

5.1. INSPECTIONS

T-101 is a shop-built tank under 5,000 gal with secondary containment, which places it in Category 1 of Steel Tank Institute standard SP001 (TBV against the current edition). Table 5-1 sets the Owner's inspection program; intervals beyond those SP001 requires are Owner practice. Records shall be kept for at least three years (112.7(e)).

Table 5-1: Inspection and Testing Program

Inspection	Frequency	Scope	By
Visual walkdown	Each site visit, at least monthly	Tank exterior, containment, loadout, piping, sheen, leaks, level gauge	Operator
SP001 monthly inspection	Monthly	SP001 monthly checklist	Owner inspector
SP001 annual inspection	Annually	Foundation, shell, roof, vents PVRV-193 and FA-193, grounding, containment, level instruments	Owner inspector
Formal external inspection	Per SP001 for Category 1 at this size (TBV)	As required	Certified inspector, if required
Containment drainage	Each drain event	Sheen check; valve opened and relocked; volume; signature	Operator
Overfill instrument test	Annually, with the station's 49 CFR 192.739 inspections	LT-191 alarm; LSHH-192 closes SDV-106 and LCV-104	Instrument technician
Piping, valves and appurtenances to T-101	Monthly with the walkdown	Aboveground piping condition, flanges, valve glands, supports	Operator

5.2. TRAINING

Table 5-2 lists the training the plan shall require.

Table 5-2: Training

Training	Who	Frequency	Rule
Discharge prevention procedures, equipment operation, rules and plan content	All oil-handling personnel, including haulers' drivers for site procedures	Before assignment, then an annual briefing	112.7(f)(1) and (3)
Person accountable for discharge prevention	The Owner's area supervisor, named in the plan	Continuous	112.7(f)(2)
Spill response drill, tabletop or field	Operators	Annually	Owner practice

5.3. SPILL RESPONSE

The plan shall set out the following response sequence. First, the operator stops the source if it is safe to do so, by closing SDV-106 and LCV-104 from the hand switch or SCADA, closing the tank valves and stopping any loadout. Second, ignition sources are removed, because the tank area is a classified hazardous area (ELE-RPT-001). Third, the release is contained: the containment normally holds any T-101 release, and outside it sorbent boom is placed downslope and ditches are blocked. Fourth, the contacts on the plan's list are notified, including the National Response Center if oil reaches or threatens waters. Fifth, liquids are recovered by vacuum truck and impacted soil is excavated and disposed of under REG-RPT-003. Finally, the date, volume, cause and corrective action are recorded, the 112.4 reporting threshold is assessed, and the plan is amended if needed.



6. CONCLUSIONS AND NEXT STEPS

The SPCC rule applies to the station because it stores 4,351 gal of oil aboveground, above the 1,320 gal threshold, with a reasonable expectation that a release could reach a tributary. The station qualifies as a Tier I facility, so the Owner may self-certify the plan without a Professional Engineer. The specified 30 in containment wall holds 248 % of T-101 and absorbs 10.3 in of rain, well above the 6.33 in design storm. No facility response plan is needed.

The requirements this framework places on the design are carried in the documents listed in Table 6-1.

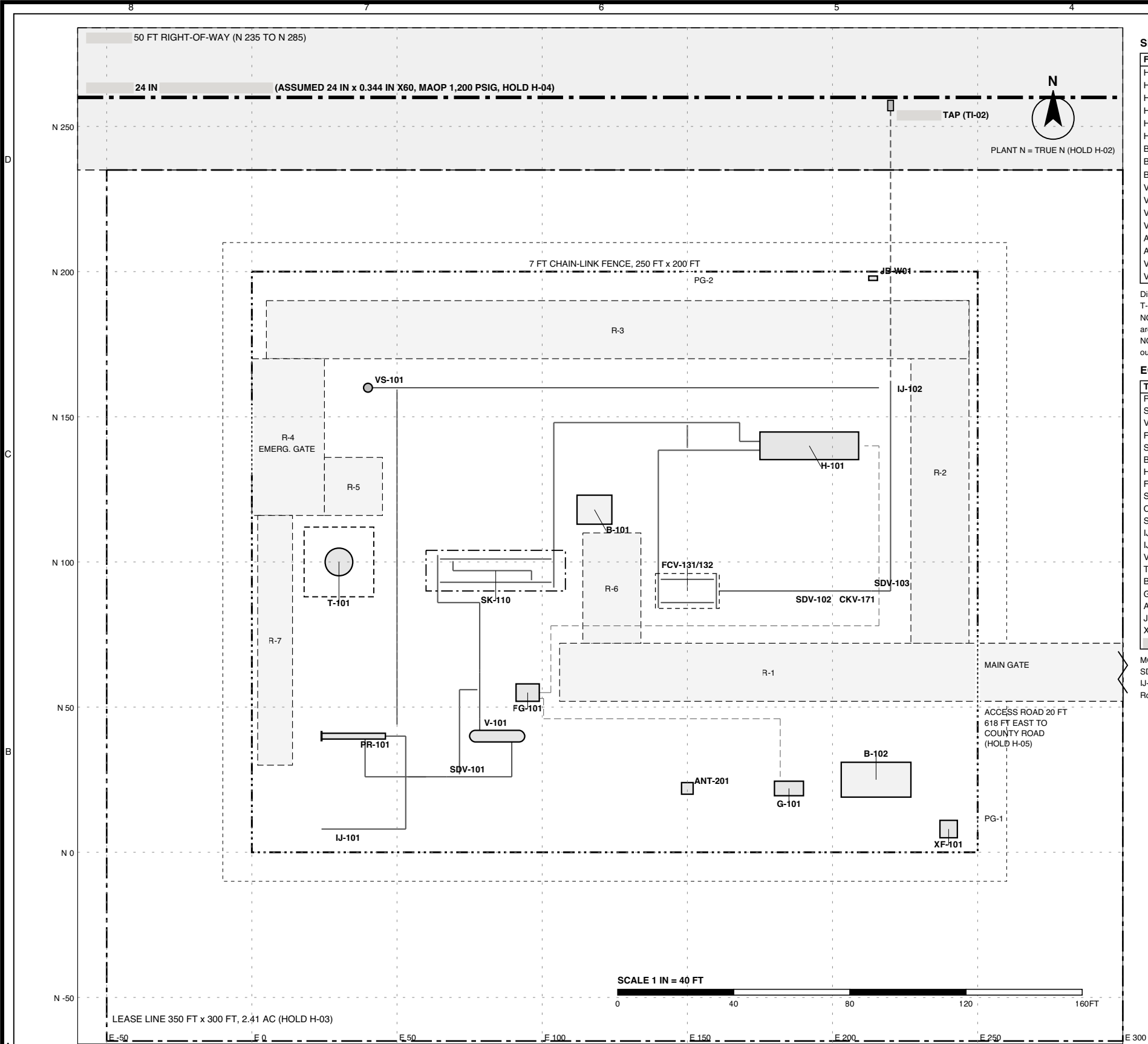
Table 6-1: Design Requirements and Where They Are Carried

Requirement	Carried in
Containment 24 x 24 ft, 30 in wall, impervious floor and walls, locked manual drain valve, no penetrations below wall height except sealed sleeves	STR-DWG-005, STR-CAL-002, CIV-RPT-003
T-101 with local gauge, LT-191, independent LSHH-192, PVRV-193, FA-193, EV-193, submerged fill, bottom drain, grounding lug	MEC-DS-004, INS-LST-001
LSHH-192 and V-101 low-low level close SDV-106 through the safety PLC; LSHH-192 closes LCV-104	INS-LST-004
Loadout with dry-disconnect coupling, drip containment, warning sign and spill kit; drum storage with containment	MEC-DWG-001
Tank on a 0.5 ft pad with hold-down against flotation	STR-CAL-002

The plan shall be prepared and implemented before T-101 receives oil, as 40 CFR 112.3(a) requires for facilities that begin operation after November 10, 2011. TORUS recommends that the Owner start it when the T-101 datasheet and containment design are final and complete it at least two weeks before gas-in (REG-RPT-002, item W-06). The open items are the vendor capacities (HOLD H-15), the rainfall at the final coordinates (HOLD H-02), the V-101 liquids rate that sets the T-101 throughput limit (HOLD H-20), and the quantity of lubricating oil stored on site (RH-17, from Owner operations).

APPENDIX A. PLOT PLAN





SPACING CHECK, BASIS GEN-DB-001 SECTION 10 (EDGE TO EDGE, FT)				
FROM	TO	DIST	MIN	RESULT
H-101	V-101	123.5	50	NOTE 1
H-101	SK-110	73.9	50	
H-101	VS-101	134.2	50	
H-101	B-101	52.5	50	
H-101	T-101 (containment)	135.0	50	
H-101	T-101 loadout (1191)	146.3	100	
B-102	HV-103H (nearest flanged joint)	56.7	50	
B-102	G-101 fuel inlet 1052 (package, ELE)	21.0	-	
B-102	FG-101 skid	106.1	50	
VS-101	B-101	78.9	50	
VS-101	B-102	205.8	50	NOTE 2
VS-101	H-101	134.2	50	
VS-101	G-101	192.7	50	
ANT-201	SDV-165 (nearest flanged joint)	56.0	-	
ANT-201	B-102 (mast fall zone 50 ft)	51.0	-	
VS-101	Fence	38.5	25	NOTE 2
VS-101	Downwind of B-102 (south wind)	brg 308 deg	N of B-102	

Distances measured edge to edge between equipment footprints on this plan.
T-101 measured to the 24 x 24 ft containment wall (tank shell is further).
NOTE 1: G-101 fuel inlet is part of the generator package, not a process source;
area classification around G-101 by Vol 6 (API RP 500).
NOTE 2: ANT-201 telecom mast has no basis spacing rule; mast and base equipment
outside classified areas per Vol 6. JB-W01 demarcation panel at the north fence.

EQUIPMENT CENTRES: BASIS 10.1 vs FINAL (E, N FT; ORIGIN SW FENCE CORNER)

TAG	BASIS	FINAL	MOVE	NOTE
PR-101	35, 40	35.0, 40.0	-	
SDV-101	52, 40	65.8, 26.0	19.7	MOVED
V-101	72, 40	84.0, 40.0	12.0	MOVED
FG-101	95, 55	95.0, 55.0	-	
SK-110	84, 97	84.0, 97.0	-	
B-101	118, 118	118.0, 118.0	-	
H-101	190, 140	192.0, 140.0	2.0	MOVED
FCV-131/132	150, 90	150.0, 90.0	-	
SDV-102	185, 90	185.0, 90.0	-	
CKV-171	200, 90	200.0, 90.0	-	
SDV-103	212, 90	212.0, 90.0	-	
IJ-102	230, 185	220.0, 157.0	29.7	MOVED
IJ-101	20, 10	26.5, 8.0	6.8	MOVED
VS-101	40, 160	40.0, 160.0	-	
T-101	30, 100	30.0, 100.0	-	
B-102	215, 25	215.0, 25.0	-	
G-101	185, 22	185.0, 22.0	-	
ANT-201	150, 22	150.0, 22.0	-	
JB-W01	214, 198	214.0, 197.5	-	
XF-101	240, 8	240.0, 8.0	-	
TAP	230, 260	220.0, 257.0	10.4	MOVED

MOVED = relocated from the Basis of Design Section 10.1 position for layout, access or road reasons.
SDV-101 in the PR-101 station branch; V-101 east 12 ft (bypass 1004 and element pull);
IJ-102 riser south of road R-3 so that only buried pipe crosses a road; tap at E 220 (H-04).
Roads R-1..R-7: 20 ft gravel unless noted. Only buried 1042, 1051 cross roads (48 in cover).

NOTES / REFERENCES

1. LOCAL GRID, ORIGIN SW FENCE CORNER, X EAST, Y NORTH, FT. SURVEY TIE HOLD H-02.

2. SHEETS 2 AND 3: FENCED STATION AT 1 IN = 20 FT, SPACING DIMENSIONS, CRANE ACCESS.

3. PIPING THIN FOR ORIENTATION ONLY, SEE PIP-DWG-001. BURIED LINES DASHED.

4. TRUNK, ROW, TAP LOCATION AND DEPTH ASSUMED (HOLD H-04). LEASE HOLD H-03.

5. FINISHED GRADE PER CIVIL: PAD PLANE, FG 1,151.1 AT E125 N100.

REF: GEN-DB-001 SEC 10

REF: PIP-DWG-001, -004

REF: CIVIL SITE / GRADING (VOL 5)

REVISIONS			
REV	DATE	DESCRIPTION	BY CHK APP
A	2026-09-29	ISSUED FOR REVIEW (IFR)	
PRELIMINARY - ISSUED FOR REVIEW - NOT FOR CONSTRUCTION			

ENGINEER OF RECORD SEAL

NOT SEALED
PRELIMINARY

PE NO. _____

PROJECT

120 MMSCFD RECEIPT INTO

COUNTY,

DISCIPLINE: MECHANICAL

SCALE: 1 IN = 40 FT

PLOT PLAN

OVERALL SITE PLAN

DRAWN: ____ CHECKED: ____ APPROVED: ____

DWG NO.

MEC-DWG-001

SHEET 1 OF 3 REV A