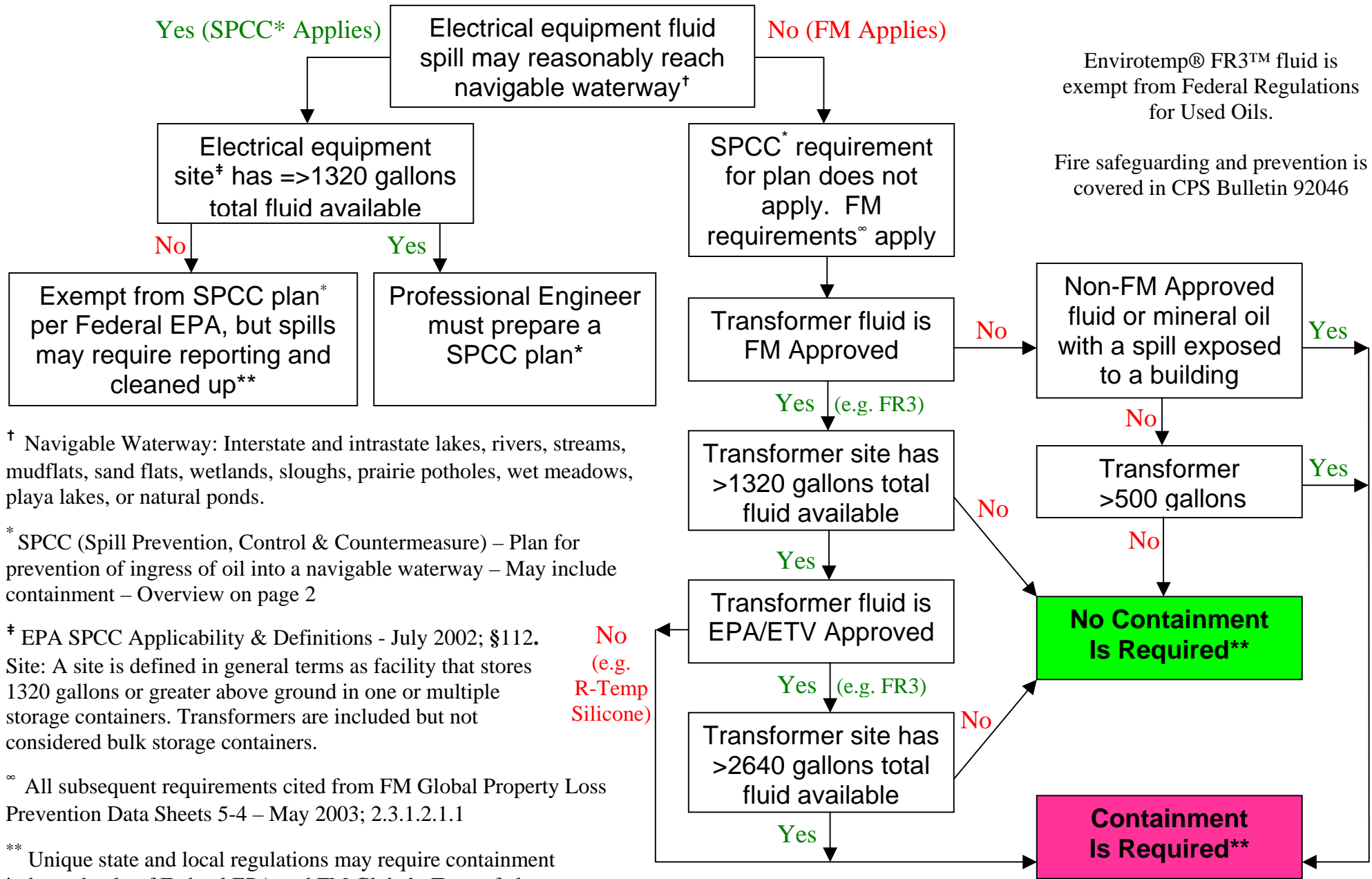


Outdoor Fluid Containment Guidelines



Envirotemp® FR3™ fluid is exempt from Federal Regulations for Used Oils.

Fire safeguarding and prevention is covered in CPS Bulletin 92046

† Navigable Waterway: Interstate and intrastate lakes, rivers, streams, mudflats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds.

* SPCC (Spill Prevention, Control & Countermeasure) – Plan for prevention of ingress of oil into a navigable waterway – May include containment – Overview on page 2

‡ EPA SPCC Applicability & Definitions - July 2002; §112. Site: A site is defined in general terms as facility that stores 1320 gallons or greater above ground in one or multiple storage containers. Transformers are included but not considered bulk storage containers.

∞ All subsequent requirements cited from FM Global Property Loss Prevention Data Sheets 5-4 – May 2003; 2.3.1.2.1.1

** Unique state and local regulations may require containment independently of Federal EPA and FM Global. Type of clean-up typically determined on a case-by-case basis. Containment options outlined on page 2.

Containment Options Include:

Gravel Retardation Media:

- Vegetable oil based FR3 fluid is less likely than mineral oil to percolate through gravel, thus impeding transmission to groundwater.
- Lower initial cost

Concrete Basins/Cement Ponds:

- Higher initial cost
- High durability
- No soil contamination
- Lower clean-up costs

Earthen Berms/Ditches:

- Lower initial cost
- Higher clean-up cost for mineral oil (e.g.: state soil remediation)

Liners:

- Moderate initial cost
- Potential for tearing
- No soil contamination
- Lower clean-up costs

Acceptance of specific containment option is site specific, at the discretion and responsibility of the PE

Removing Water From Containment:

Manual Pump:

- High maintenance
- No limitations for flat sites

Gravity Controlled

Oil Stop Valve:

- Low maintenance
- Shuts off in oil
- Limitation for flat sites

Sump Pump and Oil Sensor:

- Moderate maintenance
- Shuts off in oil
- No limitations for flat sites

SPCC Plan

Spill Prevention, Control & Countermeasure

Full Text Available:

Environmental Protection Agency, 40 CFR Part 112,
*"Oil Pollution Prevention and Response;
Non-Transportation-Related Onshore and Offshore Facilities; Final Rule"*
<http://www.epa.gov/oilspill/pdfs/40cfr112.pdf>

Additional Notes:

Key transformer applicability points are interpreted in CPS Bulletin R900-20-6, "Federal Regulations"

A 'SPCC Plan' is for prevention of ingress of oil into a navigable water and may or may not include containment

Reportable Spills:

Single Spills > 1,000 gallons

-or-

Two spills >42 gallons within 12 months

Spills must be reported to the Regional Administrator or National Response Center (800-424-8802)

This flowchart, notes, and summary represents Cooper Power System's understanding and interpretation of pertinent Federal EPA, FM Global, EPA/ETV documents in effect at the time of printing. This is an overview document and does not cover any regulation or requirement in its entirety.