

DISCLAIMER - APPENDIX D

The sample Spill Prevention, Control and Countermeasure (SPCC) Plan in Appendix D is intended to provide examples and illustrations of how a bulk storage facility could address a variety of scenarios in its SPCC Plan. The “facility” is not an actual facility, nor does it represent any actual facility or company. Rather, EPA is providing illustrative examples of the type and amount of information that is appropriate SPCC Plan language for these hypothetical situations.

Because the SPCC rule is designed to give each facility owner/operator the flexibility to tailor the facility’s SPCC Plan to the facility’s circumstances, this sample SPCC Plan is not a template to be adopted by a facility; doing so does not mean that the facility will be in compliance with the SPCC rule requirements. Nor is the sample plan a template that must be followed in order for the facility to be considered in compliance with the SPCC rule.



SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Unified Oil Company

123 A Street
Stonefield, Massachusetts 02000

May 12, 2003

Prepared by
Poppins & Associates, Inc.
Clearwater Falls, Massachusetts, 02210

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- K: Agency Notification Standard Report

LIST OF ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
EPA	U.S. Environmental Protection Agency
MADEP	Massachusetts Department of Environmental Protection
NPDES	National Pollutant Discharge Elimination System
PE	Professional Engineer
POTW	Publicly Owned Treatment Works
SPCC	Spill Prevention, Control, and Countermeasure
STI	Steel Tank Institute
UST	Underground Storage Tank

INTRODUCTION

Purpose

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

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations*, Part 112 (40 CFR part 112), and supercedes the earlier Plan developed to meet provisions in effect since 1974.

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

Unified Oil management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that Unified Oil must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 1 Regional Administrator (RA) and the Massachusetts Department of Environmental Protection (MADEP), along with other information as detailed in Section 5.4 of this Plan:
 - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;
 - or

- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.

- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.

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

- Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

Part 1: Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

Unified Oil Company ("Unified Oil") 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 Unified Oil management. Unified Oil has committed the necessary resources to implement the measures described in this Plan.

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

Authorized Facility Representative (facility response coordinator): Susan Blake

Signature:

Susan Blake

Title:

Facility Manager

Date:

May 12, 2003

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

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

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

Julie Andrews

Signature

90535055, Massachusetts

Professional Engineer Registration Number

Julie Andrews

Name

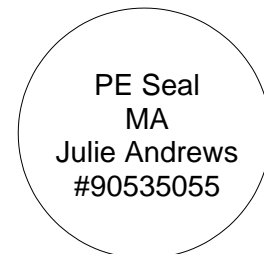
Sr. Process Engineer

Title

Poppins and Associates
Company

May 12, 2003

Date



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

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the office building. The front office is attended whenever the facility is operating, i.e., 7:00 AM to 5:00 PM, 6 days per week (closed on Sundays).

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

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

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

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

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

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

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), Unified Oil reviews this SPCC Plan at least once every five years (in the past, such reviews were required every three years). Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). The last SPCC review occurred on *May 13, 2001*. This Plan is dated *May 12, 2003*. The next plan review is therefore scheduled to take place on or prior to *May 12, 2008*.

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by *May 12, 2008*.

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

Bulk storage containers at this facility have never been tested for integrity since their installation in 1989. Section 4.2.6 of this Plan describes the inspection program to be implemented by the facility following a regular schedule, including the dates by which each of the bulk storage containers must be tested.

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

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

Table 1-1: Plan Review Log

By	Date	Activity	PE certification required?	Comments
Mike Davies	5/20/1989	Prepare Plan Start of Operations	Yes	Initial SPCC Plan.
Mike Davies	5/18/1992	Scheduled review	No	No change.
Mike Davies	2/18/1994	Plan amendment	Yes*	Changes to inspection procedures, addition of a new tank, full review not conducted.
Susan Blake	5/15/1995	Scheduled review	No	Change in responsible individual and contact information.
Susan Blake	5/15/1998	Scheduled review	No	No change.
Susan Blake	5/13/2001	Scheduled review	No	No change.
Susan Blake	5/12/2003	Periodic review due to physical change	Yes*	Installation of oil/water separator

* Previous PE certifications of this Plan are summarized below.

Date	Scope	PE Name	Licensing State and Registration No.
2/18/1994	Addition of new tank and changes in inspection procedures.	Chris Ebert	MA, 90117823
5/12/2003	Installation of oil/water separator	Julie Andrews	MA, 905350055

Table 1-2: SPCC Cross-Reference

Provision	Plan Section	Page
112.3(d)	Professional Engineer Certification	3
112.3(e)	Location of SPCC Plan	4
112.5	Plan Review	4 Table 1-1
112.7	Management Approval	3
112.7	Cross-Reference with SPCC Rule	Table 1-2
112.7(a)(3)	Part 2: General Facility Information Appendix A: Site Plan and Facility Diagram	8 Appendix A
112.7(a)(4)	5.4 Discharge Notification	32 Appendix I Appendix K
112.7(a)(5)	Part 5: Discharge Response	32
112.7(b)	3.4 Potential Discharge Volumes and Direction of Flow	13
112.7(c)	3.5 Containment and Diversionary Structures	14
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112.8(b)	4.1 Facility Drainage	23
112.8(c)(1)	4.2.1 Construction	23
112.8(c)(2)	4.2.2 Secondary Containment	25
112.8(c)(3)	4.2.3 Drainage of Diked Areas	26 Appendix D
112.8(c)(4)	4.2.4 Corrosion Protection	26
112.8(c)(5)	4.2.5 Partially Buried and Bunkered Storage Tanks	26
112.8(c)(6)	4.2.6 Inspection Appendix B - Facility Inspection Checklists	26 Appendix C
112.8(c)(7)	4.2.7 Heating Coils	27
112.8(c)(8)	4.2.8 Overfill Prevention System	27
112.8(c)(9)	4.2.9 Effluent Treatment Facilities	28
112.8(c)(10)	4.2.10 Visible Discharges	28
112.8(c)(11)	4.2.11 Mobile and Portable Containers	28
112.8(d)	4.3 Transfer Operations, Pumping and In-Plant Processes	29
112.20(e)	Certification of Substantial Harm Determination	Appendix B

* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Part 2: General Facility Information

Name:	Unified Oil Company
Address:	123 A Street Stonefield, MA 02000 (781) 555-5556
Type:	Bulk storage distribution facility
Date of Initial Operations:	May 20, 1989
Owner/Operator:	Blake and Daughters, Inc. 20 Fairview Road Stonefield, MA 02000
Primary contact:	Susan Blake, Facility Manager Work: (781) 555-5550 Cell (24 hours): (781) 555-5559

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

2.1.1 Location and Activities

Unified Oil distributes a variety of petroleum products to primarily commercial customers. The facility handles, stores, uses, and distributes petroleum products in the form of gasoline, diesel, No. 2 fuel oil, No. 6 fuel oil, and motor oil. Unified Oil receives products by common carrier via tanker truck. The products are stored in several aboveground storage tanks (ASTs) and in one underground storage tank (UST). They are delivered to customers by Unified Oil trucks or by independent contractors. The facility refuels its own two delivery trucks from an underground diesel tank connected to a fueling pump.

Hours of operation are between 7:00 AM and 5:00 PM, 6 days per week. Personnel at the facility include a facility manager, a plant operator, two truck drivers, an office administrator, and three operations and maintenance personnel.

The Site Plan and Facility Diagram included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (Figure A-2) shows the location of oil containers, buildings, loading/unloading and transfer areas, and critical spill control structures.

Unified Oil is located in a primarily commercial area at 123 A Street in Stonefield, Massachusetts. The site is comprised of approximately 2 acres of land and is bordered to the east by A Street, to the west by Silver Creek, and to the north by ABC Plating Co.

The site includes an office building, a maintenance shop, a tanker truck loading rack and unloading area, and product storage and handling areas. Petroleum products are stored within the main bulk storage area, underground, and inside the maintenance building.

2.1.2 Oil Storage

Oil storage at the facility consists of seven tanks: four fixed ASTs, one portable tank, and two metallic USTs. In addition, the facility stores a varying stock of oil drums inside the maintenance building.

The capacities of oil containers present at the site are listed below and are also indicated on the facility diagram in Figure A-2. All containers with capacity of 55 gallons or more are included. The capacity of the oil/water separator is not included in the total storage capacity for the facility since it is used to treat storm water and as a means of secondary containment for areas of the facility with potential for an oil discharge outside dikes or berms.

Unified Oil owns two 2,000-gallon transport trucks that are used to deliver product to customers. One of the two trucks is periodically parked overnight while full; the capacity of this truck is therefore counted in the total storage capacity for this facility.

Table 2-1: Oil Containers

ID	Storage capacity	Content	Description
Fixed Storage			
1	20,000 gallons	Diesel	Aboveground vertical tank
2	20,000 gallons	Unleaded regular gasoline	Aboveground horizontal tank elevated on built-in saddles
3	20,000 gallons	Unleaded premium gasoline	Aboveground horizontal tank elevated on built-in saddles
6	1,000 gallons	No. 2 fuel oil	Underground horizontal tank
7	10,000 gallons	No. 6 fuel oil	Field-constructed aboveground vertical tank
	1,100 gallons	Motor oil	55-gallon storage drums (variable stock; up to 20 drums on site at any time)
Portable storage			
4	500 gallons	Gasoline	Double-walled aboveground horizontal tank
Vehicles			
	2,000 gallons	Fuel oil	Delivery truck*

* **Note:** Unified Oil owns two delivery trucks. Both trucks are used in transportation-related activities outside the confines of the facility and generally return to the facility

empty for parking overnight. One of the two delivery trucks is periodically parked while full. This truck is therefore counted in the storage capacity for this facility. The other truck is dedicated to scheduled deliveries and returns to the facility empty (except for minor residual). If the tanker truck returns to the facility with more than residual product, this product will be returned to inventory via the unloading station. If the facility decides to use this tanker for overnight storage, then this Plan must be modified to include the capacity of the truck and ensure compliance with other rule requirements, including secondary containment.

Total Oil Storage:	74,600 gallons
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Other containers: (1) 1,500-gallon oil/water separator

Note: The oil/water separator is used treat facility drainage (i.e., wastewater) prior to discharge into Silver Creek under state and federal wastewater discharge permits. Discharge from the facility includes storm water collected from the paved areas outside the loading rack/unloading area containment berm and bulk storage containment dike. No external oil tanks are associated with the oil/water separator. This equipment is used to meet certain secondary containment requirements under 40 CFR part 112, as described later in this Plan. Thus, the capacity of the oil/water separator is not counted towards the facility total storage capacity.

(1) 5,000-gallon underground horizontal tank (Diesel) – Tank #5

Note: This underground storage tank is subject to, and meets, all the technical requirements of Massachusetts Underground Storage Tank Program at 527 CMR 9, as approved under 40 CFR part 281, and is therefore not counted in the storage capacity for this facility (exempted under 40 CFR 112.1(d)(4)). Its location is indicated on the Facility Diagram in Appendix A. Note that the other underground storage tank (Tank #6) which contains No. 2 fuel oil for heating consumption on the premises of the facility is not subject to certain technical requirements under 40 CFR part 280 or a program approved under part 281, in particular corrosion protection, and is therefore included in the storage capacity for this facility (and is SPCC-regulated), as described above.

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located on relatively level terrain. Drainage generally flows in the direction of Silver Creek, which runs immediately along the southwest side of the site. Silver Creek flows north to the Blackpool River approximately 1.5 miles from the facility. Spill trajectories are indicated on the facility diagram. Storm drains are located along A Street at the northeast end of the site. They discharge to Silver Creek.

Approximately three-quarters of the facility’s ground surface area is paved with asphalt. The remainder consists of compacted gravel, grass, and low-lying vegetation.

2.2.2 Discharge History

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

Table 2-2: Oil Discharge History

Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence
On 3/23/2003, a leaking valve on a delivery truck discharged 50 gallons of diesel oil onto the ground during a rain event, allowing approximately 10 gallons to enter Silver Creek.	A boom was placed into Silver Creek immediately upon discovery. Approximately 35 gallons of oil were recovered from Silver creek and the facility ground.	An oil/water separator was installed and the facility drainage was designed to flow into the separator.

PART 3: Discharge Prevention - General SPCC Provisions

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

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

This facility uses an oil/water separator as part of its drainage system to contain oil discharged in certain areas of the facility (i.e., overfills, and the loading/unloading area associated with Tank #4). Because Tank #4 does not meet the specifications provided in EPA's memorandum concerning its policy on double-walled tanks, general containment must be provided to address overfills. The separator provides environmental protection equivalent to the requirements under 112.8(b)(3) to use ponds, lagoons, or catchment basins to retain oil at the facility in the event of an uncontrolled discharge. As described in Section 3.5 of this Plan, the operational and emergency oil storage capacity of the oil/water separator is sufficient to handle the quantity of oil expected to be discharged in undiked areas from tank overfills or transfer operations.

Non-destructive integrity evaluation is not performed on Tank #4 (500-gallon portable storage tank) or the 55-gallon storage drums. Tank #4 has a double-wall construction and is elevated off the ground. The tank is inspected regularly and following a regular schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. Any leakage from the primary container would be detected through monitoring of the interstitial space performed on a monthly basis. Any leakage from the secondary shell would be detected visually during scheduled visual inspections by facility personnel. Storage drums are elevated on spill pallets and have all sides visible, and any leak would be readily detected by facility personnel before they can cause a discharge to navigable waters or adjoining shorelines. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage area is inspected monthly. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by EPA in the preamble to the SPCC rule at 67 FR 47120.

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

Figure A-1 in Appendix A shows the general location of the facility on a U.S. Geological Survey topographic map. Figure A-2 in Appendix A presents a layout of the facility and the location of storage tanks and drums. The diagram also shows the location of storm water drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of ASTs, USTs, and transfer stations and connecting piping.

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

The discharge notification form included in Appendix I will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

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

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

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

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Bulk Storage Area (Aboveground Storage Tanks #1, 2, 3, or 7)				
Failure of aboveground tank (collapse or puncture below product level)	20,000	Gradual to instantaneous	SW to Silver Creek	Concrete dike
Tank overfill	1 to 120	60 gal/min	SW to Silver Creek	Concrete dike
Pipe failure	20,000	240 gal/min	SW to Silver Creek	Concrete dike
Leaking pipe or valve packing	600	1 gal/min	SW to Silver Creek	Concrete dike
Leaking heating coil (Tank #7)	10,000	1 gal/min	SW to Silver Creek	Concrete dike
Loading Rack/Unloading Area				
Tank truck leak or failure inside the rollover berm	1 to 2,000	Gradual to instantaneous	SW to Silver Creek	Rollover berm, on to oil/water separator
Tank truck leak or failure outside the rollover berm	1 to 2,000	Gradual to instantaneous	SW to Silver Creek	Rollover berm, on to oil/water separator
Hose leak during truck loading	1 to 300	60 gal/min	SW to Silver Creek	Rollover berm
Fuel Dispensing Areas				
Tank #4 and diesel dispenser hose/connections leak	1 to 150	30 gal/minute	SW to Silver Creek.	Land-based spill response capability (spill kit) and oil/water separator
Maintenance Building				
Leak or failure of drum	1 to 55	Gradual to instantaneous	SW to Silver Creek.	Spill pallets, oil/water separator
Other Areas				
Complete failure of portable tank (Tank #4)	500	Gradual to instantaneous	SW to Silver Creek.	Secondary shell, oil/water separator
Leaking portable tank or overfills (Tank #4)	1 to 100	3 gal/min	SW to Silver Creek.	Secondary shell, oil/water separator

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Leak during transfer to heating fuel UST (Tank # 6)	1 to 120	60 gal/min	SW to Silver Creek.	Oil/water separator
Oil/water separator malfunction	1 to 300	1 gal/min	SW to Silver Creek.	

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

Methods of secondary containment at this facility include a combination of structures (e.g., dike, berm, built-in secondary containment), drainage systems (e.g., oil/water separator), and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

- ▶ For bulk storage containers (refer to Section 4.2.2 of this Plan):
 - ▶ **Dike.** A concrete dike enclosure is provided around fixed aboveground storage tanks, as described in Section 4.2.2 of this Plan.
 - ▶ **Double-wall tank construction.** Tank #6 (UST), and the 500-gallon portable storage tank (Tank #4) both have double-wall design with a secondary shell designed to contain 110 percent of the inner shell capacity. The portable tank is generally located near the entrance to the maintenance building; however, it may be used elsewhere on site. It is used to refuel various small pieces of equipment (each less than 55-gallon capacity) such as trucks and compressors, that may be deployed at different areas on the site.
 - ▶ **Spill pallets.** Each spill pallet has a capacity of 75 gallons, which can effectively contain the volume of any single 55-gallon drum. Drums are also stored inside the maintenance building and are not exposed to precipitation. The floor of the maintenance building and lower 24 inches of the outside walls are constructed of poured concrete that would restrict the flow of oil outside the building. The floor has two floor drains; the drain closest to the drum storage area is located 18 feet away. Floor drains flow into the oil/water separator, which is capable of containing any oil discharged from a 55-gallon drum.

- ▶ At the loading rack and unloading area (refer to Section 3.10 of this Plan):
 - ▶ **Rollover berm.** The loading rack/unloading area is surrounded by a 4-inch rollover berm that provides sufficient containment for the largest compartment of the tank truck loading or unloading at the facility (2,000 gallons), and an additional 4 inches of freeboard for precipitation.

- ▶ In transfer areas and other parts of the facility where a discharge could occur:
 - ▶ **Drip pans.** Fill ports for all ASTs are equipped with drip pans to contain small leaks from the piping/hose connections.
 - ▶ **Sorbent material.** Spill cleanup kits that include absorbent material, booms, and other portable barriers are located inside the maintenance building near the drummed oil storage area and in an outside shed located near the loading rack/unloading area, as shown on the Facility Diagram in Appendix A. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. Sorbent material, booms, and other portable barriers are stored in the shed next to the loading rack/unloading area to allow for quick deployment in the event of a discharge during loading/unloading activities or any other accidental discharge outside the dike or loading rack/unloading area, such as from tank vehicles entering/leaving the facility or spills associated with the fuel dispenser. The response equipment inventory for the facility is listed in Appendix J of this Plan. The inventory is checked monthly to ensure that used material is replenished.
 - ▶ **Drainage system.** The facility surface drainage is engineered to direct oil that may be discharged outside of engineered containment structures such as dikes or berms into the oil/water separator.
 - ▶ **Oil/water separator.** The oil/water separator is designed to separate and retain oil at the facility. The oil/water separator has a total capacity for oil/water mixture of 1,500 gallons and a design flow rate of 150 gallons per minute. The separator outlet valve can be closed in the event of a large discharge (greater than 300 gallons) to provide additional emergency containment of up to 1,200 gallons. The maximum amount of oil potentially discharged outside the diked or bermed areas is estimated at roughly 2,000 gallons (from the complete failure of an on-site tanker truck). A spill of this volume outside the diked or bermed areas will be primarily contained by deploying sorbent material and other portable spill barriers upon discovery of the spill, and additional oil containment capacity will be provided by the oil/water separator. The operating oil storage capacity is 300 gallons. Best Management Practices are used to minimize the amount of solids and oil that flow into the oil/water separator. Facility personnel are instructed to avoid and address small spills using sorbents to minimize runoff of oil into the oil/water separator. The oil/water separator is inspected monthly as part of the scheduled inspection to check the level of water within the separator and measure the depth of bottom sludges and floating oils. Floating oil is removed by a licensed waste collector when it reaches a thickness of 2 inches.

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

Unified Oil management has determined that secondary containment is practicable at this facility.

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

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

Table 3-2: Inspection and Testing Program

Facility Component	Action	Frequency/Circumstances
Aboveground container	Test container integrity. Combine visual inspection with another testing technique (non-destructive shell testing). Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Container supports and foundation	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
Diked area	Inspect for signs of deterioration, discharges, or accumulation of oil inside diked areas.	Monthly
	Visually inspect content for presence of oil.	Prior to draining
Lowermost drain and all outlets of tank truck	Visually inspect.	Prior to filling and departure
Effluent treatment facilities	Detect possible system upsets that could cause a discharge.	Daily, monthly
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly

Facility Component	Action	Frequency/Circumstances
Buried metallic storage tank	Leak test.	Annually
Buried piping	Inspect for deterioration.	Whenever a section of buried line is exposed for any reason.
	Integrity and leak testing.	At the time of installation, modification, construction, relocation, or replacement.

3.7.1 Daily Inspection

A Unified Oil employee performs a complete walk-through of the facility each day. This daily visual inspection involves: (1) looking for tank/piping damage or leakage, stained or discolored soils, or excessive accumulation of water in diked and bermed areas; (2) observing the effluent from the oil/water separator; and (3) verifying that the dike drain valve is securely closed.

3.7.2 Monthly Inspection

The checklist provided in Appendix C is used for monthly inspections by Unified Oil personnel. The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Verifying the proper functioning of overfill prevention systems.
- Checking the inventory of discharge response equipment and restocking as needed.
- Observing the effluent and measuring the quantity of accumulated oil within the oil/water separator.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Facility Manager and maintained with this SPCC Plan for a period of three years.

3.7.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in June of each year using the checklist provided in Appendix C of this Plan.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as the dike, rollover berm, control valves, and the oil/water separator.

Written annual inspection records are signed by the Facility Manager and maintained with this SPCC Plan for a period of three years.

3.7.4 Periodic Integrity Testing

In addition to the above monthly and annual inspections by facility personnel, Tanks #1, 2, 3, 4, and 7 are periodically evaluated by an outside certified tank inspector following the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks*, SP-001, 2005 version, as described in Section 4.2.6 of this Plan.

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

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

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

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

A simulation of an on-site vehicular discharge has been conducted, and future training exercises will be periodically held to prepare for possible discharge responses.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix E and maintained with this SPCC Plan for a period of three years.

3.9 Security (40 CFR 112.7(g))

The facility is surrounded by 8-ft tall steel security fencing. The fence encircles the entire footprint of the facility. The single entrance gate is locked when the facility is unattended.

All drain valves for containment areas are locked in the closed position to prevent unauthorized opening. Water draw valves on the 20,000-gallon storage tanks are maintained in the closed position to prevent unauthorized opening via locks. Keys for all locked valves are kept in the front office.

Two area lights illuminate the loading/unloading and storage areas. Additional motion-activated lights are placed in other areas of the facility. The lights are placed to allow for the discovery of discharges and to deter acts of vandalism.

The electrical starter controls for the oil pumps, including the fuel dispenser, are located in a closet inside the maintenance shop. The closet is locked when the pumps are not in use. The maintenance shop is locked when the facility is unattended.

The facility securely caps or blank-flanges the loading/unloading connections of facility piping when not in service or when in standby service for an extended period of time, or when piping is emptied of liquid content either by draining or by inert gas pressure.

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

The potential for discharges during tank truck loading and unloading operations is of particular concern at this facility. Unified Oil management is committed to ensuring the safe transfer of material to and from storage tanks. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

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

The facility has both a loading rack (for loading moderate capacity oil delivery tanker trucks) and an unloading area (where product is unloaded from large capacity tanker truck to the facility bulk storage tanks).

The loading rack and unloading area are co-located and are used by outside suppliers making deliveries to the facility and to load Unified Oil delivery trucks.

The tank truck loading rack/unloading area is surrounded with a 4-inch rollover asphalt berm that provides secondary containment in the event of a discharge during transfer operations. The secondary containment berm is designed to address the more stringent rack containment requirements of 40 CFR 112.7(h), which requires that the berm be sufficient to contain the capacity of the largest compartment, plus freeboard for precipitation. The curbed area provides a catchment capacity of 2,500 gallons, which is capable of containing the largest compartment of the petroleum suppliers truck making deliveries at this facility (maximum 2,000 gallons), and

is also capable of containing the capacity of Unified Oil's delivery trucks, which each have a total capacity of 2,000 gallons.

To minimize direct exposure to rain, and facilitate the cleanup of small spills that may occur during loading/unloading operations, the area is partially covered by a roof.

The area is graded to direct the flow of oil or water away from the vehicle, and the low point of the curbed area is fitted with a gate valve that is normally kept closed and locked. The key for that lock is kept in the main office. The berm is drained by Unified personnel after verifying that the retained water is free of oil. The accumulated water is released to the oil/water separator. The drain valve is closed and locked following drainage.

Although delivery trucks are usually empty while at the site for extended periods of time, Unified Oil periodically parks one of its two delivery trucks while full overnight. If a delivery truck is parked overnight or for an extended period of time while it still contains fuel, it is parked inside the loading rack/unloading area containment berm. As discussed above, the berm provides sufficient containment capacity for the truck volume, plus sufficient freeboard for 4 inches of precipitation.

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

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

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

All loading and unloading of tank vehicles takes place only in the designated loading rack/unloading area.

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

Table 3-3: Fuel Transfer Procedures

Stage	Tasks
Prior to loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Visually check all hoses for leaks and wet spots. <input type="checkbox"/> Verify that sufficient volume (ullage) is available in the storage tank or truck. <input type="checkbox"/> Lock in the closed position all drainage valves of the secondary containment structure. <input type="checkbox"/> Secure the tank vehicle with wheel chocks and interlocks. <input type="checkbox"/> Ensure that the vehicle's parking brakes are set. <input type="checkbox"/> Verify proper alignment of valves and proper functioning of the pumping system. <input type="checkbox"/> If filling a tank truck, inspect the lowermost drain and all outlets. <input type="checkbox"/> Establish adequate bonding/grounding prior to connecting to the fuel transfer point. <input type="checkbox"/> Turn off cell phone.
During loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Driver must stay with the vehicle at all times during loading/unloading activities. <input type="checkbox"/> Periodically inspect all systems, hoses and connections. <input type="checkbox"/> When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves. <input type="checkbox"/> When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump. <input type="checkbox"/> Maintain communication with the pumping and receiving stations. <input type="checkbox"/> Monitor the liquid level in the receiving tank to prevent overflow. <input type="checkbox"/> Monitor flow meters to determine rate of flow. <input type="checkbox"/> When topping off the tank, reduce flow rate to prevent overflow.
After loading/unloading	<ul style="list-style-type: none"> <input type="checkbox"/> Make sure the transfer operation is completed. <input type="checkbox"/> Close all tank and loading valves before disconnecting. <input type="checkbox"/> Securely close all vehicle internal, external, and dome cover valves before disconnecting. <input type="checkbox"/> Secure all hatches. <input type="checkbox"/> Disconnect grounding/bonding wires. <input type="checkbox"/> Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan. <input type="checkbox"/> Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage. <input type="checkbox"/> Remove wheel chocks and interlocks. <input type="checkbox"/> Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

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

The only field-constructed tank at the facility is Tank #7. All other tanks were shop-built.

The shell thickness of Tank #7 is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 *Tank Inspection, Repair, Alteration, and Reconstruction* (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for this tank.

Nonetheless, in the event that Tank #7 undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be evaluated for risk of discharge or failure, following API-653 or an equivalent approach, and corrective action will be taken as necessary.

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

All bulk storage tanks at this facility are registered with the state and local authorities (Stonefield Fire Department) and have current certificates of registration and special use permits required by the local fire code.

Both USTs at the facility (Tanks #5 and 6) meet all requirements of Massachusetts UST regulation, including cathodic protection, double-wall construction, and monitoring systems, although Tank #6 is not subject to these requirements.

Treated storm water runoff is discharged to Silver Creek as permitted under NPDES permit #MA0001990. The maximum allowable daily oil/grease concentration is 15 mg/L. Grab samples are taken each quarter, following the monitoring requirements specified in the NPDES permit.

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

4.1 Facility Drainage (40 CFR 112.8(b))

Drainage from the concrete dike surrounding tanks 1, 2, and 3 is restrained by a manually-operated gate valve to prevent a discharge from entering the facility drainage system. The gate valve is normally sealed closed, except when draining the secondary containment structure. The content of the secondary containment dike is inspected by facility personnel prior to draining to ensure that only oil-free water is allowed to enter the facility storm water drainage system. The bypass valve is opened and resealed under direct personnel supervision. Drainage events are recorded in the log included in Appendix D to this SPCC Plan.

Any potential discharge from ASTs will be restrained by secondary containment structures. Discharges occurring during loading/unloading operations will be restrained by the rollover berm. The facility includes a drainage system and an oil/water separator, which are used to as containment for spill sources outside the main berm areas (fuel dispensing, overfills of 500-gallon AST (Tank#4), and transfers associated with the heating oil tank). The facility is equipped with an oil/water separator engineered to retain oil at the facility. This separator provides environmental protection equivalent to ponds, lagoons, or catchments basins required under 40 CFR 112.8(b)(3) and (4), as allowed in 40 CFR 112.7(a)(2). Discharges outside the containment areas, such as those occurring in the fuel dispensing area or while unloading heating oil, will flow by gravity into the drainage collection area and into the oil/water separator where oil will be retained until it can be pumped out.

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

Table 4-1 summarizes the construction, volume, and content of bulk storage containers at Unified Oil facility.

Table 4-1: List of Oil Containers

Tank	Location	Type (Construction Standard)	Capacity (gallons)	Content	Discharge Prevention & Containment
#1	Bulk Storage Area	AST vertical (UL142)	20,000	Diesel	Concrete dike. Liquid level gauge.
#2	Bulk Storage Area	AST horizontal (UL142)	20,000	Premium unleaded gasoline	Concrete dike. Liquid level gauge.
#3	Bulk Storage Area	AST horizontal (UL142)	20,000	Regular unleaded gasoline	Concrete dike. Liquid level gauge.
#4	Varies	AST dual wall, portable tank (UL142)	500	Regular unleaded gasoline	Double-wall. Liquid level gauge and interstitial monitoring system.
#5	Fuel Dispensing Area	UST dual wall (STI P3)	5,000	Diesel	Double-wall. Liquid level gauge, overfill protection system, and interstitial monitoring.
#6	Outside Office Building	UST dual wall (STI P3)	1,000	No. 2 Fuel Oil	Double-wall. Liquid level gauge, overfill protection system, and interstitial monitoring.
#7	Bulk Storage Area	AST vertical (field-erected). Heated during winter months (internal coils)	10,000	No. 6 Fuel Oil	Concrete dike. Liquid level gauge.
	Inside Maintenance Building	Steel drums	55	Motor oil and used oil	Spill pallets with built-in containment capacity. Building also serves as containment since floor drains flow into oil/water separator

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

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

Piping between fixed aboveground bulk storage tanks is made of steel and placed aboveground on appropriate supports designed to minimize erosion and stress.

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

A dike is provided around Tanks #1, 2, 3, and 7. Tanks #1, 2, and 3 each have a 20,000-gallon capacity. Tank #7 has a 10,000-gallon capacity. The dike has a total containment capacity of 27,316 gallons to allow sufficient volume for the largest tank and freeboard for precipitation. The freeboard is sufficient to contain a 4-inch rainfall corresponding to a 25-year, 24-hour storm event for this region of Massachusetts, as documented in Appendix F of this Plan. The floor and walls of the containment dike are constructed of poured concrete reinforced with steel. The concrete dike was built under the supervision of a structural engineer and in conformance with his specifications to be impervious to oil for a period of 72 hours. The facility is unattended for a maximum of 40 hours (Saturday evening through Monday morning) and therefore any spill into the diked area would be detected before it could escape the diked area. The surface of the concrete floor, the inside and outside of the walls, and the interface of the floor and walls, are visually inspected during the monthly facility inspection to detect any crack, signs of heaving or settlement, or other structural damage that could affect the ability of the dike to contain oil. Any damage is promptly corrected to prevent migration of oil into the ground, or out of the dike.

The 500-gallon portable AST tank is of double-wall construction and provides intrinsic secondary containment for 110 percent of the tank capacity. Since the secondary containment is not open to precipitation, this volume is sufficient to fully contain the product in the event of a leak from the primary container. The interstitial space between the primary and secondary containers is inspected on a monthly basis to detect any leak of product from the primary container. The container, however, is not equipped to prevent overfills as required by EPA policy in its memorandum on double-walled tanks. Therefore, general containment is required for potential tank overfills. This containment is accomplished through the facility drainage system and the oil/water separator, which provide environmentally equivalent protection as described in Section 3.1 of this Plan.

Both USTs are of double-wall construction and provide intrinsic secondary containment for 110 percent of the tank capacity. The interstitial space between the primary and secondary containers is inspected on a monthly basis to detect any leak of product from the primary container.

The 55-gallon drums are placed on spill pallets inside the maintenance shop. Each spill pallet provides 75 gallons of containment capacity, which is more than the required 55 gallons for any single drum since the drums are not exposed to precipitation. The floor of the maintenance shop

is impervious and sloped to direct any discharge occurring in the building away from doorways and towards the drainage system that leads to the facility oil/water separator.

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

The concrete dikes are drained under direct supervision of facility personnel. The accumulated water is observed for signs of oil prior to draining. The gate valves are normally kept in a closed position and locked except when draining the dike. Dike drainage events are recorded on the form included in Appendix D of this Plan; records are maintained at the facility for at least three years.

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

Both metallic underground storage tanks, including Tank #6, which is subject to the requirements of 40 CFR part 112, are coated and cathodically protected to prevent corrosion and leakage into the ground. Pressure testing is performed on both buried storage tanks every two years following the requirements of 40 CFR part 280. The cathodic protection system is tested annually to verify its efficacy.

Cathodic protection is provided for both tanks in accordance with 40 CFR part 280 and meets the requirements of 40 CFR part 112.

Records of pressure tests are kept for at least three years.

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

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

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

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

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

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

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

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

Inspection/Test	Tank ID							Drums
	#1	#2	#3	#4	#5	#6	#7	
Visual inspection by facility personnel (as per checklist of Appendix C)	M A	M A	M A	M A			M A	M A
External inspection by certified inspector (as per STI Standard SP-001)	20 yr	20 yr	10 yr	EE			10 yr	EE
Internal inspection by certified inspector (as per STI Standard SP-001)	†	†	20 yr*	EE			20 yr*	EE
Tank tightness test meeting requirements of 40 CFR 280					2 yr	2 yr		

Legend: M: Monthly
 A: Annual
 EE: Inspection not required given use of environmentally equivalent measure (refer to Section 3.1 of this Plan).
 * Or earlier, as recommended by the certified inspector based on findings from an external inspection.
 † Internal inspection may be recommended by the certified inspector based on findings from the external inspection.

The frequency above is based on implementation of a scheduled inspection/testing program. To initiate the program, ASTs will be inspected by the following dates:

- ▶ Tank #1: external inspection to be performed by December 31, 2009
- ▶ Tank #2: external inspection to be performed by December 31, 2009
- ▶ Tank #3: external inspection to be performed by December 31, 2006
- ▶ Tank #7: external Inspection to be performed by December 31, 2006

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

Exhaust lines from internal heating coils for Tank #7 drain to the oil/water separator. The exhaust lines are monitored for signs of leakage as part of the monthly inspection of the facility.

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

All tanks are equipped with a direct-reading level gauge. Additionally, all four fixed ASTs (Tanks #1, 2, 3, and 7) are equipped with high level alarms set at 90 percent of the rated capacity. Tank

#4 does not have an overfill prevention system. General secondary containment is provided in the event of overfills, as described in this Plan.

Storage drums are not refilled, and therefore overfill prevention systems do not apply.

Tanks #5 and 6 are equipped with liquid level gauges and overfill protection systems. Liquid level sensing devices are tested on a monthly basis during the monthly inspection of the facility, following manufacturer recommendations. Venting capacity is suitable for the fill and withdrawal rates.

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

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

The facility's storm water effluent discharged into Silver Creek is observed and records maintained according to the frequency required by NPDES permit MA0000157 (at least once per month) to detect possible upsets in the oil/water separator that could lead to a discharge.

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

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

Oil is promptly removed from the diked area and disposed of according to the waste disposal method described in Part 5 of this Plan.

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

Tank #4 is of double-wall design, which provides for adequate secondary containment in the event of leaks in the primary container shell. The interstitial space is monitored monthly for signs of leakage.

Small portable oil storage containers, such as 55-gallon drums, are stored inside the maintenance shop where secondary containment is provided by spill pallets and the floor is sloped to drain away from the floor drains and door. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products.

Unified Oil delivery trucks generally return to the facility empty or product is returned to inventory. Whenever they remain at the facility while full for an extended period of time (such as when parking overnight with an emergency load of product), they are positioned in the loading rack/unloading area, which provides 2,500 gallons of secondary containment capacity (i.e., sufficient for the capacity of the delivery truck (2,000 gallons) and additional freeboard for 4 inches of precipitation).

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

Transfer operations at this facility include:

- ▶ The transfer of oil from the underground fuel oil storage tank to the furnace located in the basement of the office building. The oil is pumped from the oil storage tank by means of buried steel fuel lines and a suction pump system.
- ▶ The filling of facility delivery trucks using the gasoline dispenser.
- ▶ The transfer of oil into or from tanker trucks at the loading rack/unloading area.

All buried piping at this facility is cathodically protected against corrosion and is provided with a protective wrapping and coating. When a section of buried line is exposed, it is carefully examined for deterioration. If corrosion damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, Unified Oil conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years.

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

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

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

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Most of the aboveground piping is located within areas that are not accessible to vehicular traffic (e.g., inside diked area). Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

Part 5: Discharge Response

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

In general, the following steps are taken:

- ▶ Eliminate potential spark sources;
- ▶ If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- ▶ Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- ▶ Contact the Facility Manager or his/her alternate;
- ▶ Contact regulatory authorities and the response organization; and
- ▶ Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either “minor” or “major,” depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix J.

5.1 Response to a Minor Discharge

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- ▶ The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil);
- ▶ Discharged material is easily stopped and controlled at the time of the discharge;
- ▶ Discharge is localized near the source;
- ▶ Discharged material is not likely to reach water;
- ▶ There is little risk to human health or safety; and
- ▶ There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Unified Oil personnel. The following guidelines apply:

- ▶ Immediately notify the Facility Manager.
- ▶ Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- ▶ The Facility Manager will complete the discharge notification form (Appendix I) and attach a copy to this SPCC Plan.
- ▶ If the discharge involves more than 10 gallons of oil, the Facility Manager will call the Massachusetts Department of Environmental Protection Incident Response Division (617-556-1133).

5.2 Response to a Major Discharge

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

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

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

- ▶ All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge. Exit routes are included on the facility diagram and posted in the maintenance building, in the office building, and on the outside wall of the outside shed that contains the spill response equipment.
- ▶ If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. For example, if oil reaches a sanitary sewer, the publicly owned treatment works (POTW) should be notified immediately. A discharge that threatens Silver Creek may require immediate notification to downstream users such as the town drinking water plant, which has an intake located on Silver Creek.
- ▶ The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.
- ▶ The Facility Manager (or senior on-site person) must notify the Fire Department or Police Department.
- ▶ The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix H.

- ▶ The Facility Manager (or senior on-site person) must immediately contact the Massachusetts Department of Environmental Protection Incident Response Division (617-556-1133) and the National Response Center (888-424-8802).
- ▶ The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
- ▶ The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

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

5.3 Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks.

Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor.

5.4 Discharge Notification

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

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

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

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the loading rack/unloading area).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) *more than 1,000 gallons of oil in a single event*, or discharges (as defined in 40 CFR 112.1(b)) *more than 42 gallons of oil in each of two discharge incidents within a 12-month period*. The following information must be submitted to the EPA Regional Administrator and to MADEP within 60 days:

- ▶ Name of the facility;
- ▶ Name of the owner/operator;
- ▶ Location of the facility;
- ▶ Maximum storage or handling capacity and normal daily throughput;
- ▶ Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- ▶ Description of facility, including maps, flow diagrams, and topographical maps;
- ▶ Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- ▶ Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- ▶ Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to MADEP is included in Appendix K of this Plan.

5.5 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors are provided in Appendix H. These contractors have the necessary equipment to respond to a discharge of oil that affects Silver Creek or adjoining shorelines, including floating booms and oil skimmers.

Spill kits are located at the loading rack/unloading area and inside the maintenance building. The inventory of response supplies and equipment is provided in Appendix J of this Plan. The inventory is verified on a monthly basis. Additional supplies and equipment may be ordered from the following sources:

AA Equipment Co.
Eastern Sorbent

(800) 555-5556
(800) 555-5557

Appendix A Site Plan and Facility Diagram

Figure A-1: Site Plan.

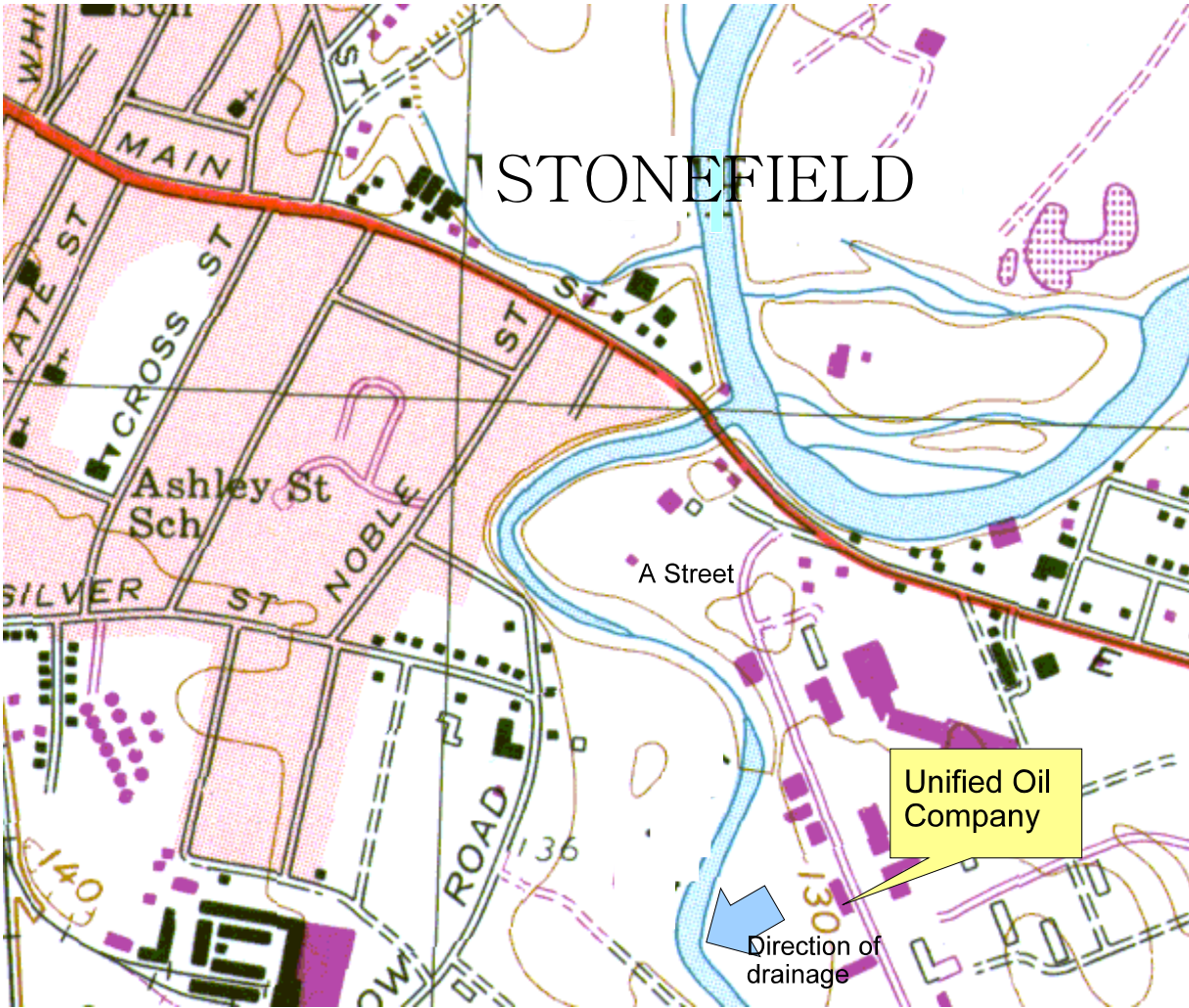
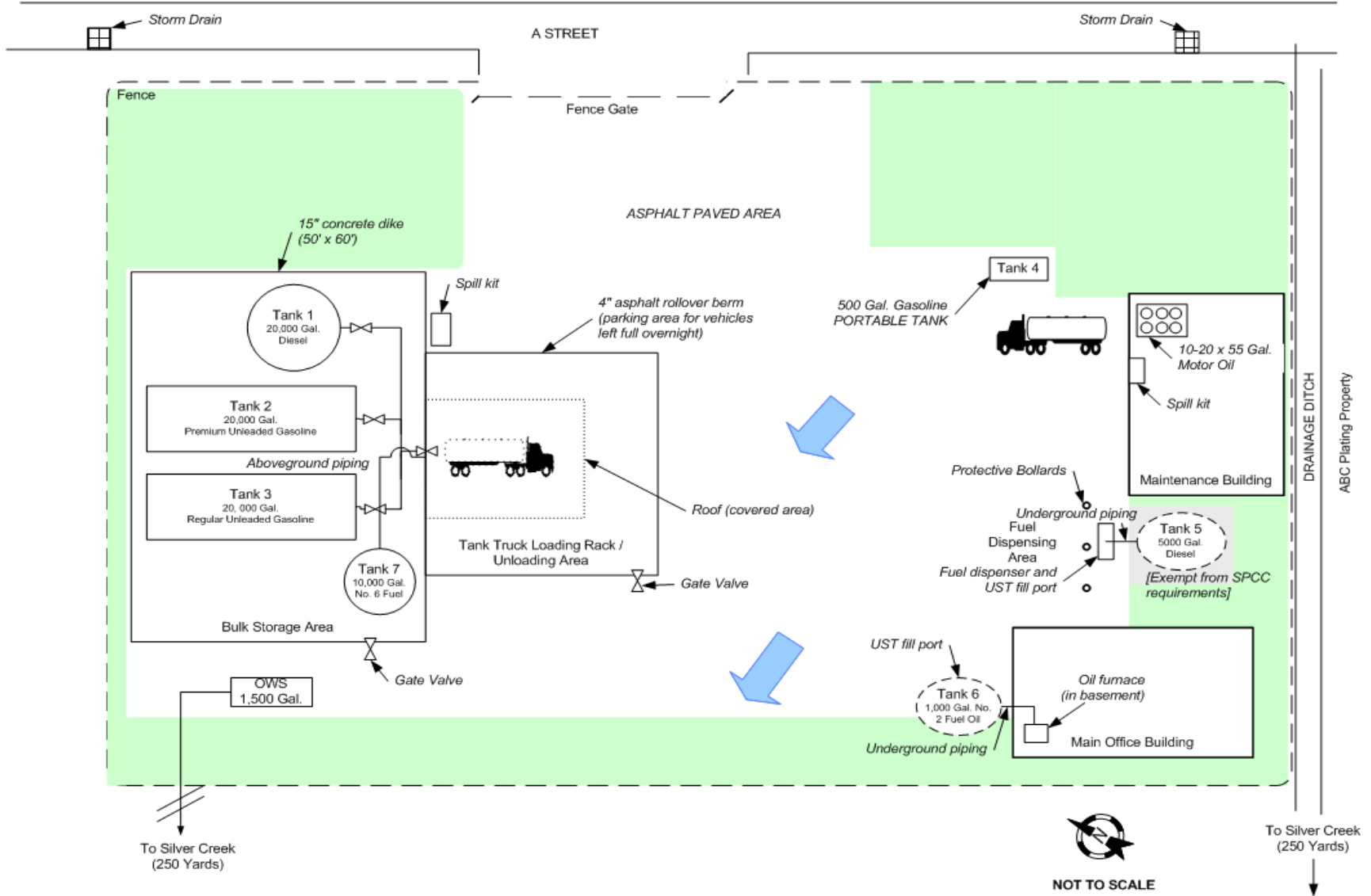


Figure A-2: Facility Diagram.



Appendix B Substantial Harm Determination

Facility Name: Unified Oil Company
Facility Address: 123 A Street
Stonefield, MA 02000

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes No
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
Yes No
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes No
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR part 112 Appendix C, Attachment C-III or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
Yes No
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes No

Certification

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

Susan Blake
Signature

Facility Manager
Title

Susan Blake
Name (type or print)

May 12, 2003
Date

APPENDIX C

Facility Inspection Checklists

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

Monthly Inspection Checklist

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

	Y*	N	Description & Comments
Storage tanks			
<i>Tank surfaces show signs of leakage</i>			
<i>Tanks are damaged, rusted or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Secondary containment is damaged or stained</i>			
<i>Water/product in interstice of double-walled tank</i>			
<i>Dike drainage valve is open or is not locked</i>			
Piping			
<i>Valve seals, gaskets, or other appurtenances are leaking</i>			
<i>Pipelines or supports are damaged or deteriorated</i>			
<i>Joints, valves and other appurtenances are leaking</i>			
<i>Buried piping is exposed</i>			
Loading/unloading and transfer equipment			
<i>Loading/unloading rack is damaged or deteriorated</i>			
<i>Connections are not capped or blank-flanged</i>			
<i>Secondary containment is damaged or stained</i>			
<i>Berm drainage valve is open or is not locked</i>			
Oil/water separator			
<i>Oil/water separator > 2 inches of accumulated oil</i>			
<i>Oil/water separator effluent has a sheen</i>			
Security			
<i>Fencing, gates, or lighting is non-functional</i>			
<i>Pumps and valves are locked if not in use</i>			
Response Equipment			
<i>Response equipment inventory is complete</i>			

Date: _____

Signature: _____

Annual Facility Inspection Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. *Any item that receives “yes” as an answer must be described and addressed immediately.

	Y*	N	Description & Comments
Storage tanks			
<i>Tank #1</i>			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted or deteriorated</i>			
<i>Bolts, rivets or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Tank #2</i>			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Tank #3</i>			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Vents are obstructed</i>			
<i>Tank #4</i>			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted or deteriorated</i>			
<i>Bolts, rivets or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			

	Y*	N	Description & Comments
<i>Vents are obstructed</i>			
<i>Oil is present in the interstice</i>			
<i>Tank #7</i>			
<i>Tank surfaces show signs of leakage</i>			
<i>Tank is damaged, rusted, or deteriorated</i>			
<i>Bolts, rivets, or seams are damaged</i>			
<i>Tank supports are deteriorated or buckled</i>			
<i>Tank foundations have eroded or settled</i>			
<i>Level gauges or alarms are inoperative</i>			
<i>Leakage in exhaust from heating coils</i>			
Concrete dike			
<i>Secondary containment is stained</i>			
<i>Dike drainage valve is open or is not locked</i>			
<i>Dike walls or floors are cracked or are separating</i>			
<i>Dike is not retaining water (following large rainfall)</i>			
Piping			
<i>Valve seals or gaskets are leaking</i>			
<i>Pipelines or supports are damaged or deteriorated</i>			
<i>Joints, valves and other appurtenances are leaking</i>			
<i>Buried piping is exposed</i>			
<i>Out-of-service pipes are not capped</i>			
<i>Warning signs are missing or damaged</i>			
Loading/unloading and transfer equipment			
<i>Loading/unloading rack is damaged or deteriorated</i>			
<i>Connections are not capped or blank-flanged</i>			
<i>Rollover berm is damaged or stained</i>			
<i>Berm drainage valve is open or is not locked</i>			
<i>Drip pans have accumulated oil or are leaking</i>			
Oil/water separator			
<i>Oil/water separator > 2 inches of accumulated oil</i>			
<i>Oil/water separator effluent has a sheen</i>			
Security			
<i>Fencing, gates, or lighting is non-functional</i>			
<i>Pumps and valves are not locked (and not in use)</i>			
Response equipment			
<i>Response equipment inventory is incomplete</i>			

Annual reminders:

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

Additional Remarks:

Date: _____

Signature: _____

APPENDIX D Record of Containment Dike Drainage

This record must be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses the water treatment system. The bypass valve must normally be sealed in closed position. It must be opened and resealed following drainage under responsible supervision.

Date	Diked Area	Presence of	Time	Time	Signature
06/05/2003	Area 1	No oil	08:00	10:00	Susan Blake
07/15/2003	Area 1	No oil	08:20	10:30	Susan Blake

APPENDIX E Record of Annual Discharge Prevention Briefings and Training

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

APPENDIX F

Calculation of Secondary Containment Capacity

The maximum 24-hour rainfall recorded in the last 25 years at this location is **3.75 inches**.

Bulk Storage Dike

Capacity of Tanks within the Diked Area:

Tank 1 = 20,000 gallons (saddle-mounted tank, no significant displacement)

Tank 2 = 20,000 gallons (saddle-mounted tank, no significant displacement)

Tank 3 = 20,000 gallons (need to account for tank displacement)

Tank 7 = 10,000 gallons (on legs, no significant displacement)

Dike Dimensions:

Dike footprint = 50 feet x 60 feet

Dike height = 15 inches = 1.25 feet

Dike volume = 50' x 60' x 1.25' = 3750 ft³ x 7.48 gal/ft³ = 28,050 gallons

Displacement Volume of Tank 3:

Tank diameter = 10 feet

$3.1415 * (10 \text{ ft})^2 / 4 * 1.25' = 98 \text{ ft}^3 * 7.48 \text{ gal/ft}^3 = 734 \text{ gallons}$

Available Freeboard for Precipitation:

28,050 gallons - (20,000 gallons + 734 gallons) = 7,316 gallons

7,316 gallons / 7.48 gallons/ft³ / (50 ft x 60 ft) = 0.33 ft = **4 inches**

The dike therefore **provides sufficient storage capacity for the largest bulk storage container within the diked area, tank displacement, and precipitation**. The containment capacity is equivalent to 137% of the capacity of the largest container ((28,050 gallons - 734 gallons)/20,000 gallons).

Loading Rack/Unloading Area Rollover Berm

Capacity of Largest Tank Truck Compartment:

2,000 gallons

Berm Dimensions:

Berm footprint = 28 feet x 45 feet (50% of the berm surface area is covered by the roof)

Berm height = 4.5 inches = 0.375 feet

Berm volume = 28 ft x 45 ft x 0.375 ft = 473 ft³ x 7.48 gal/ft³ = 3,534 gallons

Available Freeboard for Precipitation:

Since 50% of the surface area of the berm is covered by a roof, the volume of precipitation that enters the berm is reduced.

Minimum freeboard required = $28 \text{ ft} \times 45 \text{ ft} \times 0.5 \times 3.75/12 = 197 \text{ ft}^3 = 1,472 \text{ gallons}$

Actual freeboard = $3,534 \text{ gallons} - 2,000 \text{ gallons} = 1,534 \text{ gallons}$

The berm therefore **provides sufficient storage capacity to contain both the largest compartment of tank trucks loading/unloading at the facility, and the volume of precipitation that enters the berm.**

APPENDIX G

Records of Tank Integrity and Pressure Tests

Attach copies of official records of tank integrity and pressure tests.

APPENDIX H

Emergency Contacts

Designated person responsible for spill prevention: **Susan Blake, Facility Manager**
781-555-5550

EMERGENCY TELEPHONE NUMBERS:

Facility

Susan Blake, Facility Manager 781-555-5550

Local Emergency Response

Stonefield Fire Department 911 or
781-555-5551

St. Mary's Hospital 781-555-5552

Response/Cleanup Contractors

EZ Clean 617-555-5554

Stonefield Oil Removal 781-555-5555

Notification

Massachusetts Department of Environmental Protection, Incident
Response Division 617-556-1133

National Response Center 800-424-8802

United States Environmental Protection Agency, Region 1 888-372-7341

APPENDIX I Discharge Notification Form

Part A: Discharge Information		
General information when reporting a spill to outside authorities: Name: Unified Oil Company Address: 123 A Street Stonefield, MA 02000 Telephone: (781) 555-5556 Owner/Operator: Blake and Daughters, Inc. 20 Fairview Road Stonefield, MA 02000 Primary Contact: Susan Blake, Facility Manager Work: (781)555-5550 Cell (24 hrs): (781)555-5559		
Type of oil:	Discharge Date and Time:	
Quantity released:	Discovery Date and Time:	
Quantity released to a waterbody:	Discharge Duration:	
Location/Source:		
Actions taken to stop, remove, and mitigate impacts of the discharge:		
Affected media: <input type="checkbox"/> air <input type="checkbox"/> storm water sewer/POTW <input type="checkbox"/> water <input type="checkbox"/> dike/berm/oil-water separator <input type="checkbox"/> soil <input type="checkbox"/> other: _____		
Notification person:	Telephone contact: Business: 24-hr:	
Nature of discharges, environmental/health effects, and damages:		
Injuries, fatalities or evacuation required?		
Part B: Notification Checklist		
	Date and time	Name of person receiving call
Discharge in any amount		
Susan Blake, Facility Manager and Response Coordinator (781) 555-5550 / (781) 555-5559		
Discharge in amount exceeding 10 gallons and <i>not affecting a waterbody or groundwater</i>		

Local Fire Department Fire Chief: D. Evans (781) 555-1258 or 911		
Massachusetts Department of Environmental Protection (888) 304-1133 or (617) 553-1133		
Discharge in any amount and affecting (or threatening to affect) a waterbody		
Local Fire Department Fire Chief: D. Evans (781) 555-1258 or 911		
Massachusetts Department of Environmental Protection (888) 304-1133 or (617) 553-1133		
National Response Center (800) 424-8802		
*Town of Stonefield POTW Plant Operator: K. Bromberg (781) 555-5453		
Town of Stonefield Drinking Water Plant Plant Operator: D. Lopez (781) 555-5450		
EZ Clean (617) 555-5554		

* The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX J Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

Tank Truck Loading/Unloading Area

<input type="checkbox"/>	Empty 55-gallons drums to hold contaminated material	4
<input type="checkbox"/>	Loose absorbent material	200 pounds
<input type="checkbox"/>	Absorbent pads	3 boxes
<input type="checkbox"/>	Nitrile gloves	6 pairs
<input type="checkbox"/>	Neoprene gloves	6 pairs
<input type="checkbox"/>	Vinyl/PVC pull-on overboots	6 pairs
<input type="checkbox"/>	Non-sparking shovels	3
<input type="checkbox"/>	Brooms	3
<input type="checkbox"/>	Drain seals or mats	2
<input type="checkbox"/>	Sand bags	12

Maintenance Building

<input type="checkbox"/>	Empty 55-gallons drums to hold contaminated material	1
<input type="checkbox"/>	Loose absorbent material	50 pounds
<input type="checkbox"/>	Absorbent pads	1 box
<input type="checkbox"/>	Nitrile gloves	2 pairs
<input type="checkbox"/>	Neoprene gloves	2 pairs
<input type="checkbox"/>	Vinyl/PVC pull-on overboots	2 pairs
<input type="checkbox"/>	Non-sparking shovels	1
<input type="checkbox"/>	Brooms	1
<input type="checkbox"/>	Drain seals or mats	1

APPENDIX K Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 1 Regional Administrator, and to MADEP, within 60 days of the qualifying discharge incident.

Facility:	<i>Unified Oil Company</i>
Owner/operator:	<i>Blake and Daughters 20 Fairview Road Stonefield, MA 02000</i>
Name of person filing report:	
Location:	<i>123 A Street Stonefield, MA 02000</i>
Maximum storage capacity:	<i>74,600 gallons</i>
Daily throughput:	<i>8,000 gallons</i>
Nature of qualifying incident(s):	
<input type="checkbox"/> Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons <input type="checkbox"/> Second discharge exceeding 42 gallons within a 12-month period.	
Description of facility (attach maps, flow diagrams, and topographical maps):	
<p><i>Unified Oil distributes a variety of petroleum products to primarily commercial customers. The facility handles, stores, uses, and distributes petroleum products in the form of gasoline, diesel, No. 2 fuel oil, No. 6 fuel oil, and motor oil. Unified Oil receives products by common carrier via tanker truck. The products are stored in five aboveground storage tanks (ASTs) and in one underground storage tank (UST). They are delivered to customers by Unified Oil trucks or by independent contractors. The facility refuels its own two delivery trucks from an underground diesel tank connected to a fueling pump.</i></p> <p><i>Unified Oil is located in a primarily commercial area at 123 A Street in Stonefield, Massachusetts. The site is comprised of approximately 2 acres of land and is bordered to the East by A Street, to the West by Silver Creek, and to the North by ABC Plating Co.</i></p> <p><i>Site improvements include an office building, a maintenance shop, a tanker truck loading rack and unloading area, and product storage and handling areas. Petroleum products are stored in the bulk storage area, the maintenance building, and the office building.</i></p>	

Agency Notification Standard Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information: