



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

VIA ELECTRONIC MAIL – READ RECEIPT REQUESTED

Rear Admiral Stephen Barnett
Commander
U.S. Navy Region Hawaii
850 Ticonderoga Street, Suite 110
Joint Base Pearl Harbor-Hickam, Hawaii 96860-5101
stephen.d.barnett.mil@us.navy.mil

Re: Transmittal of the Spill Prevention, Control and Countermeasure and Underground Storage Tank Inspection Reports for Joint Base Pearl Harbor-Hickam

Dear Rear Admiral Barnett:

The United States Environmental Protection Agency (EPA) conducted Compliance Evaluation Inspections (CEIs) at the Joint Base Pearl Harbor Hickam (JBPHH) from February 28 – March 4, 2022. The purpose of the inspections was to evaluate the United States Department of the Navy's (the Navy's) compliance with the Oil Pollution Prevention (OPP) Regulations, including Spill Prevention, Control and Countermeasure (SPCC) requirements under Section 311 of the Clean Water Act, and Hawaii's approved Underground Storage Tank regulations pursuant to Subtitle I of the Resource Conservation and Recovery Act (RCRA).

EPA will provide a copy of the complete SPCC and UST CEI Inspection Reports in a subsequent email which includes a password-protected EPA Go Anywhere FTP link. Both CEI Inspection Reports describe conditions at JBPHH at the time of inspection and identifies areas of noncompliance with applicable requirements. The reports do not evaluate compliance in areas of U.S. Coast Guard jurisdiction, including between the pump house and the piers. Please note that any omissions in the CEI Inspection Reports shall not be construed as a determination of compliance with any other applicable regulation.

The OPP Inspection findings include, but are not limited to:

- The Navy does not have SPCC or Facility Response Plan coverage for the piping system between the Red Hill Fuel Storage Facility and the Underground Pump-House at JBPHH.
- The Navy has not fully implemented its SPCC plan consistent with conditional certification by a Professional Engineer, including concerns that certain existing secondary containment systems are inadequate.
- The Navy is not operating the piping system between the Red Hill Fuel Storage Facility and the Underground Pumphouse in accordance with good engineering practice.
- The Navy's SPCC plan, certifications, checklists and inspection records are not fully complete and/or in need of updating.

- The Integrated Contingency Plan for JBPHH did not adequately address all required spill response planning and implementation requirements.

The UST Inspection findings include, but are not limited to:

- Two underground storage tanks (Main Containment Sump for Fuel Oil Reclamation and Zone 7 sump for Fuel Oil Reclamation) were not permitted by the Hawaii Department of Health for petroleum storage and no records were available to demonstrate required UST practices for these tanks.
- Spill buckets at the Hickam Airfield and for the Ewa Product Tank had no spill bucket testing records available.
- Product Recovery Tanks at Diamond Head and Ewa had no overfill prevention equipment. Overfill prevention equipment must be installed and inspected once every three years.

Please identify any information in this letter or in the CEI Inspection Reports and associated attachments that you claim is confidential business information within fourteen (14) days of receipt of this letter. If you make a confidentiality claim, and if EPA determines that the information you designated meets the criteria in 40 C.F.R. Section 2.208, we will disclose the information only to the extent, and by means of the procedures, specified in 40 C.F.R. Part 2, Subpart B. If you make such a claim, please simultaneously provide a copy of the reports with the claimed CBI or other privileged information redacted. If you do not make a claim of confidentiality, we will assume that you are waiving confidentiality and the information you provide may be made public without further notice. If the Navy determines that information requested is classified in accordance with Executive Order No. 13526, the EPA will work with the Navy to protect such information.

We request that the Navy review and provide a response to this letter with a plan to address the findings in the CEI Inspection Reports within thirty (30) calendar days from the date of receipt of this letter.

Thank you for your attention to this important matter. If you have any questions regarding the UST CEI Inspection Report, please contact Bobby Ojha at (415) 972-3374 or Ojha.Bobby@epa.gov, regarding the SPCC CEI Inspection Report, please contact Pete Reich at

(415) 972-3052 or Reich.Peter@epa.gov, or have your attorney contact Rebekah Reynolds at (415) 972-3916 or reynolds.rebekah@epa.gov.

Sincerely,

Amy C. Miller-Bowen, Director
Enforcement and Compliance Assurance Division

cc: (b) (6), JBPHH
Kathleen Ho, Deputy Director, Hawaii Department of Health
Roxanne Kwan, Hawaii Department of Health



U.S. ENVIRONMENTAL PROTECTION AGENCY

SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

ONSHORE FACILITIES (EXCLUDING OIL DRILLING, PRODUCTION AND WORKOVER)

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for onshore facilities including Tier II Qualified Facilities (excluding facilities involved in oil drilling, production and workover activities) that meet the eligibility criteria set forth in §112.3(g)(2).

Separate standalone checklists address requirements for:
Onshore oil drilling, production, and workover facilities including Tier II Qualified Facilities as defined in §112.3(g)(2);
Offshore drilling, production and workover facilities; and
Tier I Qualified Facilities (for facilities that meet the eligibility criteria defined in §112.3(g)(1))

Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for qualified facilities. These provisions are addressed in Attachment D.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Sections 112.8 and 112.12 specify requirements for spill prevention, control, and countermeasures for onshore facilities (excluding production facilities).

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment E at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Attachments

- Attachment A is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment C is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled operational equipment that chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment D is a checklist for Tier II Qualified Facilities.
- Attachment E is for recording additional comments or notes.
- Attachment F is for recording information about photos.

FACILITY INFORMATION			
FACILITY NAME: Joint Base Pearl Harbor Hickam (JBPHH) Activities and Tenant Commands			
LATITUDE: 21° 21' 30"	LONGITUDE: 157° 56' 54"	GPS DATUM:	
Section/Township/Range:	FRS#/OIL DATABASE ID: R9-HI-00033	ICIS#:	
ADDRESS: 850 Ticonderoga Street, Suite 110			
CITY: JBPHH	STATE: HI	ZIP: 96860	COUNTY: Honolulu
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"):			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE: (b) (6)	FACILITY CONTACT NAME/TITLE: (b) (6), Environmental Engineer		
OWNER NAME:			
OWNER ADDRESS:			
CITY: JBPHH	STATE: HI	ZIP: 96860-5101	COUNTY: Honolulu
TELEPHONE:	FAX:	EMAIL: (b) (6) @navy.mil	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): Commander, Navy Region Hawaii			
OPERATOR ADDRESS: 850 Ticonderoga Street, Suite 110			
CITY:	STATE:	ZIP:	COUNTY:
TELEPHONE:	OPERATOR CONTACT NAME/TITLE:		
FACILITY TYPE: National Security			NAICS CODE: 928110
HOURS PER DAY FACILITY ATTENDED: 0730-1630 M-F or 24/7		TOTAL FACILITY CAPACITY: >(b) (3) (A) gallons	
TYPE(S) OF OIL STORED: Gasoline, diesel, jet fuel, new and used oils			
LOCATED IN INDIAN COUNTRY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO RESERVATION NAME:			
INSPECTION/PLAN REVIEW INFORMATION			
PLAN REVIEW DATE: Feb 17 2022+	REVIEWER NAME: J Witul, P Reich		
INSPECTION DATE: 28 Feb-4 Mar 2022	TIME: 0800+	ACTIVITY ID NO: 22-4024	
LEAD INSPECTOR: Janice Witul, Pete Reich			
OTHER INSPECTOR(S): Bobby Ojha, Rick Sakow – UST Program			
INSPECTION ACKNOWLEDGMENT			
I performed an SPCC inspection at the facility specified above.			
INSPECTOR SIGNATURE:			DATE:
SUPERVISOR REVIEW/SIGNATURE:			DATE:

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND**☒ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States

☒ Yes ☐ NoAFFECTED WATERWAY(S): [Pearl Harbor \(to Mamala Bay to Pacific Ocean\)](#)DISTANCE: [Adjacent in some areas](#)FLOW PATH TO WATERWAY: [Overland or storm drains, to Halawa Stream or directly to Harbor.](#)*Note: The following storage capacity is not considered in determining applicability of SPCC requirements:*

- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)
- Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;
- Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;
- Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)
- Containers smaller than 55 U.S. gallons;
- Permanently closed containers (as defined in §112.2);
- Motive power containers (as defined in §112.2);
- Hot-mix asphalt or any hot-mix asphalt containers;
- Heating oil containers used solely at a single-family residence;
- Pesticide application equipment and related mix containers;
- Any milk and milk product container and associated piping and appurtenances; and
- Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.

Does the facility have an SPCC Plan?

☒ Yes ☐ No**FACILITY RESPONSE PLAN (FRP) APPLICABILITY—40 CFR 112.20(f)**

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

- ☒ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, **OR**
- ☒ The facility has a total oil storage capacity of at least 1 million U.S. gallons, **AND** at least one of the following is true:
 - ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
 - ☒ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
 - ☒ The facility is located such that a discharge would shut down a public drinking water intake.
 - ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☒ Yes ☐ No ☐ NAFRP Number: [FRP_R9_0348](#)

Facility has a completed and signed copy of Appendix C, Attachment C-II, "Certification of the Applicability of the Substantial Harm Criteria."

☐ Yes ☒ No

Comments:

112.1 - Prior to and at the time of the EPA SPCC/FRP inspection, the UST systems (completely buried tanks and associated buried piping) associated with the Red Hill fueling system and operation (including the Hickam hydrant system), were not subject to all of the technical requirements of 40 CFR part 280 or all of the technical requirements of a State program approved under 40 CFR part 281 and therefore regulated under 40 CFR part 112.

The current UST systems (completely buried tanks and buried piping) associated with the Red Hill fueling system and operation (including the Hickam hydrant system) **were not addressed in the facility SPCC plan.** This includes:

- The 20 completely buried storage tanks use for oil storage
- All underground piping associated with the Red Hill fueling system and operation
- Completely buried tanks used as sumps for the Red Hill fueling system harbor tunnels/adits
- The Hickam hydrant system (and associated completely buried storage tanks and piping)
- The four completely buried storage surge tanks at the pumphouse.

Finally, the fuel piping system that connects the 20 Red Hill Fuel Storage tanks to the underground pumphouse at JBPHH has been determined to be aboveground piping and therefore subject to SPCC requirements. However, the piping system was not covered by a SPCC Plan prior to and at the time of the inspection. It is also noted that this piping system was incorrectly assumed to be part of the UST system and therefore exempt from SPCC requirements at the time of and prior to the SPCC Inspection conducted the week of 02/28/2022.

112.20(f) JBPHH is identified in the Hawaii Area Contingency Plan as being located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments, and self-identified as such in the facility's Integrated Contingency Plan (ICP). Reportable discharge $\geq 10,000$ gallons in the past five years was checked in the Plan Certification form; this check was reported by the Navy to be in error.

Certification of the Applicability of the Substantial Harm Criteria document in Plan only includes checklist portion; the certification/signature page is not included. **Note: Updated/corrected Substantial Harm Criteria certification submitted to EPA on 4/19/2022.**

SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less AND	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has NOT had:	
• A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, OR	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period ¹	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

IF YES TO ALL OF THE ABOVE, THEN THE FACILITY IS A TIER II QUALIFIED FACILITY²
SEE ATTACHMENT D FOR TIER II QUALIFIED FACILITY CHECKLIST

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3

Date facility began operations: ~1925

Date of initial SPCC Plan preparation: Unknown	Current Plan version (date/number): 31 Dec 2019 (previous Plan reportedly Mar 2014)
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112.3(a)	For facilities (except farms), including mobile or portable facilities:	
	<ul style="list-style-type: none"> In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by November 10, 2011 Beginning operations after November 10, 2011, Plan prepared and fully implemented before beginning operations 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.3(b)	For farms (as defined in §112.2):	
	<ul style="list-style-type: none"> In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by May 10, 2013 Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by May 10, 2013 Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
112.3(d)	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: <ul style="list-style-type: none"> PE is familiar with the requirements of 40 CFR part 112 PE or agent has visited and examined the facility Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 Procedures for required inspections and testing have been established Plan is adequate for the facility 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
PE Name: (b) (6) License No.: (b) (6) State: VA Date of certification: 31 Dec 2019		
112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. (Please note nearest field office contact information in comments section below.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

¹ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

² An owner/operator who self-certifies a Tier II SPCC Plan may include environmentally equivalent alternatives and/or secondary containment impracticability determinations when reviewed and certified by a PE.

Comments:

112.3(d) – PE Certification states “This certification is subject to the condition that the recommendations indicated on the individual facility data sheets will be implemented in a timely manner.”
Recommendations on the individual facility data sheets in Appendix B and summarized in Appendix J of Plan are not documented as having been implemented within 6-months, or at all - a condition of Plan certification. Thus, the certification is incomplete.

AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4

112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period? ³	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES	<ul style="list-style-type: none"> Was information submitted to the RA as required in §112.4(a)?⁴ Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located §112.4(c) Date(s) and volume(s) of reportable discharges(s) under this section: _____ Were the discharges reported to the NRC⁵? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

Comments:

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If YES	<ul style="list-style-type: none"> Was the Plan amended within six months of the change? Were amendments implemented within six months of any Plan amendment? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years? Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)? Amendments implemented within six months of any Plan amendment? Five year Plan review and evaluation documented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) [Except for self-certified Plans]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA

Name:

License No.:

State:

Date of certification:

Reason for amendment: 112.5(a) – Unknown. Previous version of Plan was reportedly dated March 2014. The current SPCC plan, with a certification date of December 31, 2019, may not be in compliance with applicable amendment and recertification requirements because no previous technical amendments and re-certifications are documented.

Comments:

112.5(b) -Technical Amendment Certification and Review record only includes the latest review in 2018 and does not include the previous reviews. Current Plan was not certified by PE until 31 December 2019, which is not within the required 6-month limit for plan amendment after review. Recommendations in Appendix B and Appendix J of Plan are not documented as having been implemented within 6-months, or at all – a condition of Plan certification.

112.5(c) – PE certification is for entire Plan, newly prepared, rather than technical amendments.

³ A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

⁴ Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

⁵ Inspector Note-Confirm any spills identified above were reported to NRC

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan ⁶		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed (<i>Note: Relevant for inspection evaluation and testing baselines.</i>)		<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2), and 112.12(c)(11)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	
If YES	<ul style="list-style-type: none"> The Plan states reasons for nonconformance Alternative measures described in detail and provide equivalent environmental protection (<i>Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description</i>) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Describe each deviation and reasons for nonconformance:			
<p>Comments:</p> <p>112.7 – <i>Management Approvals and Commitment</i> form is included in the SPCC Plan at Section 1.2, but not filled in. Blocks for Name, Date, and Signature are all blank.</p> <p>A Cross-reference table is present in the SPCC Plan, but it is incomplete. Specifically, the requirements of 112.12 for non-petroleum oils, which are present at the Facility, are not addressed.</p>			

⁶ May be part of the Plan or demonstrated elsewhere.

		PLAN	FIELD
112.7(a)(3)	<p>Plan describes physical layout of facility and includes a diagram⁷ that identifies:</p> <ul style="list-style-type: none"> • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11) <p>Plan addresses each of the following:</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
112.7(a)(4)	<p><i>Does not apply if the facility has submitted an FRP under §112.20:</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p>Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the:</p> <ul style="list-style-type: none"> • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted. 		
112.7(a)(5)	<p><i>Does not apply if the facility has submitted a FRP under §112.20:</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p>Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency</p>		
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	

Comments: 112.7(a)(3)(i)-(iv) – Not all piping between tanks or outside of secondary containment is shown on the Facility Diagram(s) - for example, the site diagram for the Upper Tank Farm is missing some transfer areas (e.g. where fuel is not supplied to equipment by piping); the Red Hill Fuel Storage Facility (RHFSF) completely buried storage tanks, which are not included among the SPCC regulated containers in the SPCC Plan; and the piping between RHFSF and JBPHH are not included among the regulated equipment that should be documented in the Plan. There are also three separation tanks near the Bilge and Oily Water Treatment System (BOWTS) Tank A-4 which are not included on the Facility diagram or in the tank list. Consequently, the discharge prevention measures, discharge or drainage controls, and the countermeasures for the discovery, response and cleanup (both facility's and contractor's resources) for these areas has been determined to be inadequate due to the omission of certain containers, piping and equipment from the SPCC Plan.

112.7(b) – Plan does not include major equipment failures such as tank overflow or rupture (full capacity). Direction of flow information is referenced as being on Site Diagrams for individual container data sheets in Appendix B, but not all the diagrams include direction of flow indications or show discharge direction outside secondary containment areas.

		PLAN	FIELD																							
112.7(c)	<p>Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist.</p> <p>For onshore facilities, one of the following or its equivalent:</p> <ul style="list-style-type: none"> Dikes, berms, or retaining walls sufficiently impervious to contain oil; Curbing or drip pans; Sumps and collection systems; Culverting, gutters or other drainage systems; Weirs, booms or other barriers; Spill diversion pond; Retention ponds; or Sorbent materials. <p>Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:</p> <table border="1"> <tr> <td><input checked="" type="checkbox"/> Bulk storage containers</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Mobile/portable containers</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Oil-filled operational equipment (as defined in 112.2)</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input type="checkbox"/> Other oil-filled equipment (i.e., manufacturing equipment)</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Piping and related appurtenances</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Mobile refuelers or non-transportation-related tank cars</td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Transfer areas, equipment and activities</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Identify any other equipment or activities that are not listed above: <u>Loading/unloading racks</u></td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</td> <td><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA</td> </tr> </table>	<input checked="" type="checkbox"/> Bulk storage containers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Mobile/portable containers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Oil-filled operational equipment (as defined in 112.2)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Other oil-filled equipment (i.e., manufacturing equipment)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input checked="" type="checkbox"/> Piping and related appurtenances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Mobile refuelers or non-transportation-related tank cars	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Transfer areas, equipment and activities	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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<input type="checkbox"/> Other oil-filled equipment (i.e., manufacturing equipment)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA																								
<input checked="" type="checkbox"/> Piping and related appurtenances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA																								
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112.7(d)	<p>Secondary containment for one (or more) of the following provisions is determined to be impracticable:</p> <table border="0"> <tr> <td><input type="checkbox"/> General secondary containment §112.7(c)</td> <td><input type="checkbox"/> Bulk storage containers §§112.8(c)(2)/112.12(c)(2)</td> </tr> <tr> <td><input type="checkbox"/> Loading/unloading rack §112.7(h)(1)</td> <td><input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)</td> </tr> </table>	<input type="checkbox"/> General secondary containment §112.7(c)	<input type="checkbox"/> Bulk storage containers §§112.8(c)(2)/112.12(c)(2)	<input type="checkbox"/> Loading/unloading rack §112.7(h)(1)	<input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																				
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<input type="checkbox"/> Loading/unloading rack §112.7(h)(1)	<input type="checkbox"/> Mobile/portable containers §§112.8(c)(11)/112.12(c)(11)																									
If YES	<ul style="list-style-type: none"> The impracticability of secondary containment is clearly demonstrated and described in the Plan For bulk storage containers,⁸ periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted <p><i>(Does not apply if the facility has submitted a FRP under §112.20):</i></p> <ul style="list-style-type: none"> Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) AND Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <div></div> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA																							
<p>Comments:</p> <p>112.7(c) - PE states (in Appendices B and J) that many areas with fixed or portable containers have less than required secondary containment including precipitation freeboard (of 10-13 inches, depending on location).</p> <p>Field compliance is difficult to evaluate due to lack of inclusion of many regulated containers and piping.</p> <p>Plan appears to consider only oil-filled electrical equipment under oil-filled equipment; not clear if all oil-filled operational equipment has been included.</p>																										

⁸ These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE
 Onshore Facilities (Excluding Oil Production)

		PLAN	FIELD
112.7(e)	<p>Inspections and tests conducted in accordance with written procedures</p> <p>Record of inspections or tests signed by supervisor or inspector</p> <p>Kept with Plan for at least 3 years (see Attachment B of this checklist)⁹</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
112.7(g)	<p>Plan describes how to:</p> <ul style="list-style-type: none"> Secure and control access to the oil handling, processing and storage areas; Secure master flow and drain valves; Prevent unauthorized access to starter controls on oil pumps; Secure out-of-service and loading/unloading connections of oil pipelines; and Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
112.7(h)	<p>Tank car and tank truck loading/unloading rack¹⁰ is present at the facility</p> <p><i>Loading/unloading rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If YES (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the loading or unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<p>Comments:</p> <p>112.7(e) - Periodic inspections reportedly were not performed monthly due to lack of available personnel until 2020 in some cases. Quarterly inspections were conducted as specified in previous version of SPCC Plan (March 4 Photo Log #1). Some documents were not legible due to water damage, such that inspection dates could not be determined and details regarding unsatisfactory conditions may be lost (February 28 Photo Log #1-3). Because RHFSF tanks and piping and other regulated containers are not included in Plan, they have not been inspected/documented in accordance with SPCC requirements.</p> <p>112.7(f) – Some training records reviewed on-site during the inspection - not able to verify that all oil-handling personnel have been properly trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the SPCC Plan. In addition, the discharge prevention briefings required for all oil-handling personnel have not been fully verified.</p>			

⁹ Records of inspections and tests kept under usual and customary business practices will suffice

¹⁰ Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply

		PLAN	FIELD
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
112.7(k)	<p>Qualified oil-filled operational equipment is present at the facility¹¹ <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>Oil-filled operational equipment</i> means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.</p> <p>If YES Check which apply:</p> <p>Secondary Containment provided in accordance with 112.7(c) <input checked="" type="checkbox"/></p> <p>Alternative measure described below (confirm eligibility) <input checked="" type="checkbox"/></p>		
112.7(k)	<p>Qualified Oil-Filled Operational Equipment</p> <ul style="list-style-type: none"> Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?¹² <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA 		
If YES for either, secondary containment in accordance with §112.7(c) is required			
	<ul style="list-style-type: none"> Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented <p>Does not apply if the facility has submitted a FRP under §112.20:</p> <ul style="list-style-type: none"> Contingency plan following 40 CFR part 109 (see Attachment C of this checklist) is provided in Plan AND Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:			

¹¹ This provision does not apply to oil-filled manufacturing equipment (flow-through process)

¹² Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12		PLAN	FIELD
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: <ul style="list-style-type: none"> • Restrained by valves, except where facility systems are designed to control such discharge, OR • Manually activated pumps or ejectors are used and the condition of the accumulation is inspected prior to draining dike to ensure no oil will be discharged 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(2)	Diked storage area drain valves are manual, open-and-closed design (not flapper-type drain valves) If drainage is released directly to a watercourse and not into an onsite wastewater treatment plant, retained storm water is inspected and discharged per §§112.8(c)(3)(ii), (iii), and (iv) or §§112.12(c)(3)(ii), (iii), and (iv).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Undiked Areas (3)	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas. ¹³	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(4)	If facility drainage not engineered as in (b)(3) (i.e., drainage flows into ponds, lagoons, or catchment basins) then the facility is equipped with a diversion system to retain oil in the facility in the event of an uncontrolled discharge. ¹⁴	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(5)	Are facility drainage waters continuously treated in more than one treatment unit and pump transfer is needed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
If YES	<ul style="list-style-type: none"> • Two "lift" pumps available and at least one permanently installed • Facility drainage systems engineered to prevent a discharge as described in §112.1(b) in the case of equipment failure or human error 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Comments: 112.8(b) – RHFSF tanks, piping, and piping containment and/or drainage controls – both diked and undiked- are not addressed in Plan.			
112.8(c)/112.12(c) Bulk Storage Containers <input type="checkbox"/> NA <i>Bulk storage container</i> means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container. If bulk storage containers are not present, mark this section Not Applicable (NA). If present, complete this section and Attachment A of this checklist.			
(1)	Container materials and construction are compatible with material stored and conditions of storage such as pressure and temperature	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(2)	Except for mobile refuelers and other non-transportation-related tank trucks, construct all bulk storage tank installations with secondary containment to hold capacity of largest container and sufficient freeboard for precipitation Diked areas sufficiently impervious to contain discharged oil OR Alternatively, any discharge to a drainage trench system will be safely confined in a facility catchment basin or holding pond	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA

¹³ Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

¹⁴ These provisions apply only when a facility drainage system is used for containment; otherwise mark NA

		PLAN	FIELD
(3)	Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
If YES	• Bypass valve normally sealed closed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
	• Retained rainwater is inspected to ensure that its presence will not cause a discharge as described in §112.1(b)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
	• Bypass valve opened and resealed under responsible supervision	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
	• Adequate records of drainage are kept; for example, records required under permits issued in accordance with 40 CFR §§122.41(j)(2) and (m)(3)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(4)	For completely buried metallic tanks installed on or after January 10, 1974 (if not exempt from SPCC regulation because subject to all of the technical requirements of 40 CFR part 280 or 281): <ul style="list-style-type: none"> • Provide corrosion protection with coatings or cathodic protection compatible with local soil conditions • Regular leak testing conducted 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(5)	The buried section of partially buried or bunkered metallic tanks protected from corrosion with coatings or cathodic protection compatible with local soil conditions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(6)	<ul style="list-style-type: none"> • Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. Techniques include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other system of non-destructive testing • Appropriate qualifications for personnel performing tests and inspections are identified in the Plan and have been assessed in accordance with industry standards • The frequency and type of testing and inspections are documented, are in accordance with industry standards and take into account the container size, configuration and design • Comparison records of aboveground container integrity testing are maintained • Container supports and foundations regularly inspected • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas • Records of all inspections and tests maintained¹⁵ 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Integrity Testing Standard identified in the Plan: API 653 for field erected tanks, STI SP001 for shop fabricated tanks and portable containers.			
112.12 (c)(6)(ii) <i>(Applies to AFVO Facilities only)</i>	Conduct formal visual inspection on a regular schedule for bulk storage containers that meet all of the following conditions: <ul style="list-style-type: none"> • Subject to 21 CFR part 110; • Elevated; • Constructed of austenitic stainless steel; • Have no external insulation; and • Shop-fabricated. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
	You must determine and document in the Plan the appropriate qualifications for personnel performing tests and inspections. ¹⁶	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA

¹⁵ Records of inspections and tests kept under usual and customary business practices will suffice
Onshore Facilities (Excluding Oil Production)

		PLAN	FIELD
(7)	Leakage through defective internal heating coils controlled: <ul style="list-style-type: none"> Steam returns and exhaust lines from internal heating coils that discharge into an open watercourse are monitored for contamination, OR Steam returns and exhaust lines pass through a settling tank, skimmer, or other separation or retention system 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
(8)	Each container is equipped with at least one of the following for liquid level sensing: <ul style="list-style-type: none"> High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station, or audible air vent in smaller facilities; High liquid level pump cutoff devices set to stop flow at a predetermined container content level; Direct audible or code signal communication between container gauger and pumping station; Fast response system for determining liquid level (such as digital computers, telepulse, or direct vision gauges) and a person present to monitor gauges and overall filling of bulk containers; or Regularly test liquid level sensing devices to ensure proper operation. 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(9)	Effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(10)	Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(11)	Mobile or portable containers positioned to prevent a discharge as described in §112.1(b). Mobile or portable containers (excluding mobile refuelers and other non-transportation-related tank trucks) have secondary containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard to contain precipitation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
112.8(d)/112.12(d) Facility transfer operations, pumping, and facility process			
(1)	Buried piping installed or replaced on or after August 16, 2002 has protective wrapping or coating Buried piping installed or replaced on or after August 16, 2002 is also cathodically protected or otherwise satisfies corrosion protection standards for piping in 40 CFR part 280 or 281 Buried piping exposed for any reason is inspected for deterioration; corrosion damage is examined; and corrective action is taken	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(2)	Piping terminal connection at the transfer point is marked as to origin and capped or blank-flanged when not in service or in standby service for an extended time	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(3)	Pipe supports are properly designed to minimize abrasion and corrosion and allow for expansion and contraction	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(4)	Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly to assess their general condition Integrity and leak testing conducted on buried piping at time of installation, modification, construction, relocation, or replacement	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
(5)	Vehicles warned so that no vehicle endangers aboveground piping and other oil transfer operations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<p>Comments: 112.8(c)(2) – Plan Appendices B and J Findings and Recommended Actions list many areas throughout JBPHH where containment is either lacking, insufficient, or not sufficiently impervious.</p> <p>112.8(c)(6) - Plan periodic (monthly) checklist does not include all items from STI SP001 monthly checklist for example, overfill prevention equipment, inspection of interstice, or concrete-encapsulated tank items).</p> <p>Intervals are shown for formal tank inspections in accordance with applicable industry standards, but no schedules supplied for specific tanks.</p> <p style="text-align: right;">See also Attachment E for additional Plan comments</p>			

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ATTACHMENT A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE

Documentation of Field Observations for Containers and Associated Requirements

Inspectors should use this table to document observations of containers as needed.

Containers and Piping

Check containers for leaks, specifically looking for: drip marks, discoloration of tanks, puddles containing spilled or leaked material, corrosion, cracks, and localized dead vegetation, and standards/specifications of construction.

Check aboveground container foundation for: cracks, discoloration, and puddles containing spilled or leaked material, settling, gaps between container and foundation, and damage caused by vegetation roots.

Check all piping for: droplets of stored material, discoloration, corrosion, bowing of pipe between supports, evidence of stored material seepage from valves or seals, evidence of leaks, and localized dead vegetation. For all aboveground piping, include the general condition of flange joints, valve glands and bodies, drip pans, pipe supports, bleeder and gauge valves, and other such items (Document in comments section of §112.8(d) or 112.12(d).)

Secondary Containment (Active and Passive)

Check secondary containment for: containment system (including walls and floor) ability to contain oil such that oil will not escape the containment system before cleanup occurs, proper sizing, cracks, discoloration, presence of spilled or leaked material (standing liquid), erosion, corrosion, penetrations in the containment system, and valve conditions.

Check dike or berm systems for: level of precipitation in dike/available capacity, operational status of drainage valves (closed), dike or berm impermeability, debris, erosion, impermeability of the earthen floor/walls of diked area, and location/status of pipes, inlets, drainage around and beneath containers, presence of oil discharges within diked areas.

Check drainage systems for: an accumulation of oil that may have resulted from any small discharge, including field drainage systems (such as drainage ditches or road ditches), and oil traps, sumps, or skimmers. Ensure any accumulations of oil have been promptly removed.

Check retention and drainage ponds for: erosion, available capacity, presence of spilled or leaked material, debris, and stressed vegetation.

Check active measures (countermeasures) for: amount indicated in plan is available and appropriate; deployment procedures are realistic; material is located so that they are readily available; efficacy of discharge detection; availability of personnel and training, appropriateness of measures to prevent a discharge as described in §112.1(b).

Container ID/ General Condition ¹⁶ Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections
20 Completely buried Red Hill Bulk Fuel Storage Facility Tanks <small>(Became regulated under Subtitle I of Resource Conservation and Recovery Act (RCRA) upon Hawaii's program approval after inspection, as of 3/7/2022))</small>	~ million gallons ea F-24, JP-5, F-76	Not addressed in Plan/not explained (In mountain and terminate at the bottom of the tunnel)	Automatic tanks gauging system with alarms – not addressed in Plan, but noted in field
FLC-Adit 1 Standby Generator Tank	1,000 gallons Diesel	Double-walled (DW) Concrete Encapsulated Tank	Direct reading gages
FLC-S311 RH Adit 3 Fuel Oil Recovery Tank	40,000 gallons Slop oil, oily water	Concrete Dike with liner	Attended transfers and manual gauging
FLC-2170-11-1 FLC-2170-11-2 Hickam Air Force Base (AFB) Tanks	(b) (3) (A) gallons ea Jet A	Concrete Dike with liner	Automatic tank gauging system with alarms
FLC-2170-11-3 FLC-2170-11-4 Hickam AFB Tanks	(b) (3) (A) gallons ea Jet A	Concrete Dike with liner	Automatic tank gauging system with alarms
FLC-2169-5-1 FLC-2169-5-2 Hickam AFB Tanks	(b) (3) (A) gallons ea Diesel	Closed-top diked tanks	Automatic tank gauging system with alarms
FLC-2169-9-3 FLC-2169-9-4 Hickam AFB Tanks	(b) (3) (A) gallons ea Jet Propulsion Thoroughly Stable (JPTS) fuel	DW tanks	Automatic tank gauging system with alarms

¹⁶ Identify each tank with either an A to indicate aboveground or B for completely buried
Onshore Facilities (Excluding Oil Production)

ATTACHMENT A: SPCC FIELD INSPECTION AND PLAN REVIEW TABLE (CONT.)

Documentation of Field Observations for Containers and Associated Requirements

Container ID/ General Condition ¹⁷ Aboveground or Buried Tank	Storage Capacity and Type of Oil	Type of Containment/ Drainage Control	Overfill Protection and Testing & Inspections
Tanks 46, 47, 48, 53, 54, 55 Upper Tank Farm	(b) (3) (A) gallons ea Diesel, Jet A, JP-5, JP-8, F-76	Earthen berm with impermeable liner	Automatic tank gauging system with alarms
Fuel Oil Reclamation Facility Tanks B-1/ B-2	378,000 gallons ea Oily Water/Reclaimed fuel	Facility concrete dike	Automatic tank gauging system with alarms
FLC-1811 FLC-1812	~30,000 gallons ea Lube Oil	DW tanks	Automatic tank gauging system with alarms
FLC-S660-301 Pipeline Interface Storage	(b) (3) (A) gallons F-76, Jet A	Concrete dike with impermeable liner	Automatic tank gauging system with alarms
F-ST1, F-ST2, F-ST3, F-ST4 Surge Tanks	(b) (3) (A) gals Various pipeline fuels	Not covered in SPCC Plan	Not covered in SPCC Plan
Completely buried tanks used as sumps for the Red Hill fueling system harbor tunnels/adits		Not covered in SPCC Plan	Not covered in SPCC Plan
Completely buried tanks associated with Hickam hydrant system		Not covered in SPCC Plan	Not covered in SPCC Plan

¹⁷ Identify each tank with either an A to indicate aboveground or B for completely buried

ATTACHMENT B: SPCC INSPECTION AND TESTING CHECKLIST

Required Documentation of Tests and Inspections

Records of inspections and tests required by 40 CFR part 112 signed by the appropriate supervisor or inspector must be kept by all facilities with the SPCC Plan for a period of three years. Records of inspections and tests conducted under usual and customary business practices will suffice. Documentation of the following inspections and tests should be kept with the SPCC Plan.

Inspection or Test		Documentation		Not Applicable
		Present	Not Present	
112.7-General SPCC Requirements				
(d)	Integrity testing for bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Integrity and leak testing of valves and piping associated with bulk storage containers with no secondary containment system and for which an impracticability determination has been made	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h)(3)	Inspection of lowermost drain and all outlets of tank car or tank truck prior to filling and departure from loading/unloading rack	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(i)	Evaluation of field-constructed aboveground containers for potential for brittle fracture or other catastrophic failure when the container undergoes a repair, alteration, reconstruction or change in service or has discharged oil or failed due to brittle fracture failure or other catastrophe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k(2)(i)	Inspection or monitoring of qualified oil-filled operational equipment when the equipment meets the qualification criteria in §112.7(k)(1) and facility owner/operator chooses to implement the alternative requirements in §112.7(k)(2) that include an inspection or monitoring program to detect oil-filled operational equipment failure and discharges	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
112.8/112.12-Onshore Facilities (excluding oil production facilities)				
(b)(1), (b)(2)	Inspection of storm water released from diked areas into facility drainage directly to a watercourse	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(3)	Inspection of rainwater released directly from diked containment areas to a storm drain or open watercourse before release, open and release bypass valve under supervision, and records of drainage events	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(4)	Regular leak testing of completely buried metallic storage tanks installed on or after January 10, 1974 and regulated under 40 CFR 112	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)(6)	Regular integrity testing of aboveground containers and integrity testing after material repairs, including comparison records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(6), (c)(10)	Regular visual inspections of the outsides of aboveground containers, supports and foundations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(6)	Frequent inspections of diked areas for accumulations of oil	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(8)(v)	Regular testing of liquid level sensing devices to ensure proper operation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)(9)	Frequent observations of effluent treatment facilities to detect possible system upsets that could cause a discharge as described in §112.1(b)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)(1)	Inspection of buried piping for damage when piping is exposed and additional examination of corrosion damage and corrective action, if present	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)(4)	Regular inspections of aboveground valves, piping and appurtenances and assessments of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)(4)	Integrity and leak testing of buried piping at time of installation, modification, construction, relocation or replacement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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ATTACHMENT C: SPCC CONTINGENCY PLAN REVIEW CHECKLIST☒ NA**40 CFR Part 109—Criteria for State, Local and Regional Oil Removal Contingency Plans**

If SPCC Plan includes an impracticability determination for secondary containment in accordance with §112.7(d), the facility owner/operator is required to provide an oil spill contingency plan following 40 CFR part 109, unless he or she has submitted a FRP under §112.20. An oil spill contingency plan may also be developed, unless the facility owner/operator has submitted a FRP under §112.20 as one of the required alternatives to general secondary containment for qualified oil filled operational equipment in accordance with §112.7(k).

109.5—Development and implementation criteria for State, local and regional oil removal contingency plans¹⁸		Yes	No
(a)	Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	<input type="checkbox"/>	<input type="checkbox"/>
(1)	The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	<input type="checkbox"/>	<input type="checkbox"/>
(2)	A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	<input type="checkbox"/>	<input type="checkbox"/>
(3)	Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., National Contingency Plan (NCP)).	<input type="checkbox"/>	<input type="checkbox"/>
(4)	An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	<input type="checkbox"/>	<input type="checkbox"/>
(1)	The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	<input type="checkbox"/>	<input type="checkbox"/>
(2)	An estimate of the equipment, materials and supplies that would be required to remove the maximum oil discharge to be anticipated.	<input type="checkbox"/>	<input type="checkbox"/>
(3)	Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:	<input type="checkbox"/>	<input type="checkbox"/>
(1)	Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	<input type="checkbox"/>	<input type="checkbox"/>
(2)	Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	<input type="checkbox"/>	<input type="checkbox"/>
(3)	A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	<input type="checkbox"/>	<input type="checkbox"/>
(4)	Provisions for varying degrees of response effort depending on the severity of the oil discharge.	<input type="checkbox"/>	<input type="checkbox"/>
(5)	Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	<input type="checkbox"/>	<input type="checkbox"/>

¹⁸ The contingency plan should be consistent with all applicable state and local plans, Area Contingency Plans, and the NCP.

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ATTACHMENT D: TIER II QUALIFIED FACILITY CHECKLIST

☒ NA

TIER II QUALIFIED FACILITY PLAN REQUIREMENTS —40 CFR 112.6(b)		
112.6(b)(1)	Plan Certification: Owner/operator certified in the Plan that:	<input type="checkbox"/> Yes <input type="checkbox"/> No
(i)	He or she is familiar with the requirements of 40 CFR part 112	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(ii)	He or she has visited and examined the facility ¹⁹	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(iii)	The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the requirements of this part	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(iv)	Procedures for required inspections and testing have been established	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(v)	He or she will fully implement the Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(vi)	The facility meets the qualification criteria set forth under §112.3(g)(2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(vii)	The Plan does not deviate from any requirements as allowed by §§112.7(a)(2) and 112.7(d), except as described under §112.6(b)(3)(i) or (ii)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(viii)	The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.6(b)(2)	Technical Amendments: The owner/operator self-certified the Plan's technical amendments for a change in facility design, construction, operation, or maintenance that affected potential for a §112.1(b) discharge	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If YES	<ul style="list-style-type: none"> Certification of technical amendments is in accordance with the self-certification provisions of §112.6(b)(1). 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(i)	A PE certified a portion of the Plan (i.e., Plan is informally referred to as a hybrid Plan)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If YES	<ul style="list-style-type: none"> The PE also certified technical amendments that affect the PE certified portion of the Plan as required under §112.6(b)(4)(ii) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(ii)	The aggregate aboveground oil storage capacity increased to more than 10,000 U.S. gallons as a result of the change	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If YES	<i>The facility no longer meets the Tier II qualifying criteria in §112.3(g)(2) because it exceeds 10,000 U.S. gallons in aggregate aboveground storage capacity.</i>	
	The owner/operator prepared and implemented a Plan within 6 months following the change and had it certified by a PE under §112.3(d)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.6(b)(3)	Plan Deviations: Does the Plan include environmentally equivalent alternative methods or impracticability determinations for secondary containment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
If YES	Identify the alternatives in the hybrid Plan:	
	<ul style="list-style-type: none"> Environmental equivalent alternative method(s) allowed under §112.7(a)(2); Impracticability determination under §112.7(d) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
112.6(b)(4)	<ul style="list-style-type: none"> For each environmentally equivalent measure, the Plan is accompanied by a written statement by the PE that describes: the reason for nonconformance, the alternative measure, and how it offers equivalent environmental protection in accordance with §112.7(a)(2); For each secondary containment impracticability determination, the Plan explains the reason for the impracticability determination and provides the alternative measures to secondary containment required in §112.7(d) 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
	AND	
(i)	PE certifies in the Plan that:	
(A)	He/she is familiar with the requirements of 40 CFR Part 112	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(B)	He/she or a representative agent has visited and examined the facility	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
(C)	The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Comments:		

¹⁹ Note that only the person certifying the Plan can make the site visit

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ATTACHMENT E: ADDITIONAL COMMENTS

As part of EPA's Multi-media inspection at JBPHH, RHFSF was inspected by representatives of the Oil Program (SPCC/FRP) and the Office of Underground Storage Tanks. Inspectors from the State of Hawaii Department of Health Underground Storage Tank program also participated in this inspection. It was determined that the RHFSF tanks were not adequately addressed as Completely Buried Storage Containers subject to applicable regulatory requirements of the SPCC Rule, and therefore not properly addressed in the SPCC Plan or Integrated Contingency Plan (ICP) evaluated as part of this inspection. Additionally, the piping between RHFSF and JBPHH may constitute a facility (as aboveground piping with a capacity exceeding 1,320 gallons) as defined by 40 CFR 112.2, and should also be included in an SPCC Plan.

In the SPCC Plan, the RHFSF tanks were improperly characterized as USTs that are exempt from SPCC requirements. Federal regulations for the management of USTs storing petroleum or hazardous substances were first published in 1988. In January 2000, the State of Hawaii promulgated rules requiring owners and operators of such facilities to, among other things, report suspected or confirmed releases from USTs. Effective September 30, 2002, EPA granted final approval for the State of Hawaii's UST program to operate in lieu of Federal rules regarding USTs. On July 15, 2015, EPA published revisions to the 1988 UST regulations. These regulations included new requirements for field-constructed USTs, secondary containment and operator training. In 2018, the State of Hawaii promulgated rules to conform with EPA's 2015 revisions to the UST regulations. On October 18, 2018, the State of Hawaii submitted an application for EPA approval of the state revisions. On March 7, 2022, EPA granted approval of the State of Hawaii's revised UST program.

The completely buried storage capacity of an SPCC facility excludes the capacity of any completely buried tanks and connected underground piping, underground ancillary equipment, and containment systems, that are currently subject to all of the technical requirements of 40 CFR part 280 or all of the technical requirements of a State program approved under 40 CFR part 281, and are also exempt from the SPCC rule.

Prior to and at the time of the EPA SPCC/FRP inspection, the UST systems (completely buried tanks and associated buried piping) associated with the RHFSF and operation (including the Hickam hydrant system), were not subject to all of the technical requirements of 40 CFR part 280 or all of the technical requirements of a State program approved under 40 CFR part 281 and therefore regulated under 40 CFR part 112.

CONTINUED COMMENTS – From Page 13

112.8(c)(10) - Slight discharge noted at Tank FLC-2170-11-2 thermal relief valve (March 3 Photo Log #17).

112.8(c)(11) – Placement of portable containers and generators on pier (required for shipboard work). Plan states that drums and portable generators (among other tanks) lack sufficient secondary containment.

112.8(d)(3) - Pipe pads on pipeline supports rusted and causing corrosion on pipeline between Pump House 1554 and DFSP PH Airfield (March 3 Photo Log #7,8). Edges of pipe supports in tunnel could cause damage to pipe if excessive movement occurred, corrosion of support could lead to failure and result in pipe sag (March 2 Photo Log #39).

CNRH Activities and Tenant Commands – Facility Specific Information (SPCC Plan Appendix B) Comments

Appendix B-1: Naval Supply Systems (NAVSUP) Command Fleet Logistics Center Pearl Harbor (FLCPH)/Defense Fuel Supply Center Pearl Harbor (DFSP PH) Bulk Terminal

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include one area where secondary containment is lacking for portable containers, and several sites where containment impermeability was questionable.

Point of Contact listed as "Unknown" on Table B-1 for up to 800 each 55-gallon drums at FLCPH HAZMAT storage facility.

Field Observations for areas covered by Appendix B-1 of Plan -

Combustible materials in proximity to hydrocarbon systems (March 1 Photo Log #6, 7).

Unexplained fuel odor near RHFSF Tank 11 upper hatch (March 1 Photo Log #22).

No apparent gaskets in some manway flanges in RHFSF Upper Tunnel (March 1 Photo Log #34).

Screen display for RHFSF tank showed anomaly regarding level of fuel (March 1 Photo Log #36). Additional screen displays appeared to have time discrepancies, as time for Last Update is later than actual HST (March 1 Photo Log #8, 17, 29, 30).

Small leak observed at RHFSF Tank 9 low point drain (March 1 Photo Log #79, 80). **Note - Condition reported fixed by March 2.**

ATTACHMENT E: ADDITIONAL COMMENTS (CONT.)

Lack of information and understanding of tunnel drainage - including the French drain system, and drainage to FOR and AFFF tanks - could lead to a failure of containment, and result in discharges leaving the RHFSF.

Defects observed on each of three RHFSF pipelines, ranging from dents and gauges and issues with pipe coating (March 2 Photo Log #41, 42, 46-57, 60-66, 71, 73, 74, 83-86, 89, 91, 92), to pitting and corrosion (March 2 Photo Log #80-82).

Some equipment observed appears to deviate from good engineering practices (e.g., Dresser couplings (March 1 Photo log #59, March 2 Photo log #100) and system for vacuum bleed-off (March 1 Photo log #64)).

Diesel Tank FLC-Adit 1 had noticeable corrosion on piping (March 2 Photo Log #9). Plan states that piping is attached to building wall with steel bracing, while tank's concrete block legs are described as resting on concrete base pad (not secured).

The Underground Pump House sump (March 2 Photo Log #98, 99) appears to be subject to SPCC requirements.

Appendix B-2: Naval Facilities Engineering Command (NAVFAC) Hawaii

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include many areas where secondary containment is insufficient or lacking for tanks or portable containers, and several sites where containment drain valves are closed but not locked or sealed.

Three tanks west of Bilge Water Tank A-4 in BOWTS area (March 4 Photo Log #6,7) are not included on Table B-2 or facility maps or detail sheets.

Field Observations for areas covered by Appendix B-2 of Plan -

Tank D-4 in Power Plant #2 tank farm located in Shipyard Controlled Industrial Area (CIA) had corrosion at shell-to-bottom joint (March 4 PHNSY & IMF Photo Log #14). Capacity and imperviousness of containment area appeared to have been compromised by open piping through containment wall and vegetation growing through floor seam (March 4 PHNSY & IMF Photo Log #10, 15, 16).

Appendix B-6: Hickam Air Force Base (AFB)/Defense Fuel Supply Point Pearl Harbor (DFSP PH) Airfield

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include many areas where secondary containment is insufficient or lacking for tanks or portable containers, and several instances of corrosion on tanks and/or tank appurtenances.

Filter units in pumphouse were not included in SPCC Plan (March 3 Photo Log #38, 39); some reported to be 55 gallons or larger.

SPCC Plan review only; site inspections did not include the following areas-

Appendix B-3: Naval Station (NAVSTA)

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include several areas where secondary containment is insufficient or lacking for tanks or portable containers, and several instances of corrosion on tanks and/or tank appurtenances.

Oil storage includes a 385-gallon Used Cooking Oil tank (NS-631-2) at the Navy Exchange Mall, Bldg. 631. Applicable regulations for Animal Fats and Oils are found at 40 CFR 112.12, which is not addressed in the SPCC Plan.

Appendix B-4: West Loch Annex, NAVMAG Lualualei Annex, Beckoning Point, Kalaeloa

No explanation found in Plan for acronym NMC PAC EAD DET

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include one area where secondary containment is lacking for drums, and several sites where containment drain valves are closed but not locked or sealed.

Appendix B-5: Wahiawa Annex, RTF Lualualei Annex, Pearl City Peninsula, Manama Fire Station

No explanation found in Plan for acronym NCTAMS

Plan recommendations (required to be addressed as condition of P.E.'s certification of the SPCC Plan) include several areas where secondary containment is lacking for tanks or portable containers, and a few instances of corrosion or other external defects on tanks.

ATTACHMENT F: PHOTO DOCUMENTATION NOTES

[illegible]

ATTACHMENT F: PHOTO DOCUMENTATION NOTES (CONT.)

Photo#	Photographer Name	Time of Photo Taken	Compass Direction	Description

U.S. Environmental Protection Agency
Region 9 Oil Program

SPCC PHOTOGRAPHIC LOG

Facility Name & Location:
Joint Base Pearl Harbor Hickam (JBPHH)

Photographer:
J Witul

Camera:
Olympus Tough TG-5

Date Photographs Were Taken:
28 February 2022

Photo No. Time:
1 1518

Direction Photo Taken:
Close-up

Photo Description:

Water-damaged Discharge Drainage Report record for Upper Tank Farm Tank 48. Legible dates show 2019 and 2020.

Drainage Discharge Report Form

Location: [REDACTED] LTF 16-48
Tank/Facility No. [REDACTED]

Procedures:

1. Visually check the accumulated rainwater for the presence of oil or sheen.
2. If sheen is visible, remove all sheen using absorbent pad, oil boom or other suitable methods prior to discharge of rainwater.
3. Open drain valve and completely close drain valve after discharge is completed. Do not leave drain valve unattended when draining the rainwater from the secondary containment.
4. Drain Valve shall remain closed at all except when draining the secondary containment.
5. For discharges directly or indirectly (e.g., catch basin, drain line, drain inlet, etc.) into any surface water (e.g., rivers, streams, harbor waters, etc.) record the following information below.

Date Oil/Sheen Removed (if Applicable)	Date/Time Drain Valve Opened	Date/Time Drain Valve Closed	Observations	Print Name and Signature of Operator
N/A	1/12/19 1400	1/12/19 1405	CLEAN NO SHEEN	
N/A	1/15/20 1510	1/15/20 1515	CLEAN NO SHEEN	
N/A	2/24/20 1144	2/24/20 1146	Clean (no sheen)	
N/A	2/23/20 0830	2/23/20 0810	cleaning sheen	
N/A	3/23/20 0830	3/23/20 1000	Clean/No sheen	
N/A	4/15/20 0940	4/15/20 1025	Clean/No sheen	

Drainage Discharge Report Form shall be retained by the Inspector for a minimum of three years. Records shall be made available for review by the NAVFAC HI Environmental Stewards Department, PR445 and the NAVFAC HI Environmental Compliance Department.

Photo No. Time:
2 1519

Direction Photo Taken:
Close-up

Photo Description:

Water-damaged Discharge Drainage Report record for Upper Tank Farm Tank 47. Legible dates show 2021.

Drainage Discharge Report Form

Location: [REDACTED] LTF 16-47
Tank/Facility No. [REDACTED]

Procedures:

1. Visually check the accumulated rainwater for the presence of oil or sheen.
2. If sheen is visible, remove all sheen using absorbent pad, oil boom or other suitable methods prior to discharge of rainwater.
3. Open drain valve and completely close drain valve after discharge is completed. Do not leave drain valve unattended when draining the rainwater from the secondary containment.
4. Drain Valve shall remain closed at all except when draining the secondary containment.
5. For discharges directly or indirectly (e.g., catch basin, drain line, drain inlet, etc.) into any surface water (e.g., rivers, streams, harbor waters, etc.) record the following information below.

Date Oil/Sheen Removed (if Applicable)	Date/Time Drain Valve Opened	Date/Time Drain Valve Closed	Observations	Print Name and Signature of Operator
N/A	3/10/21 1110	3/10/21 1110	Clean/No sheen	
N/A	3/25/21 0820	3/25/21 1000	Clean/No sheen	
N/A	4/20/21 0820	4/20/21 0820	Clean/No sheen	
N/A	4/23/21 0820	4/23/21 0820	Clean/No sheen	
N/A	4/24/21 0820	4/24/21 0820	Clean/No sheen	
N/A	7/13/21 1025	7/13/21 1025	Clean/No sheen	
N/A	11/8/21 1115	11/8/21 1115	Clean/No sheen	

Drainage Discharge Report Form shall be retained by the Inspector for a minimum of three years. Records shall be made available for review by the NAVFAC HI Environmental Stewards Department, PR445 and the NAVFAC HI Environmental Compliance Department.

Photographer: WITUL		
Photo No. 3	Time: 1521	
Direction Photo Taken: Close-up		
Photo Description: Water-damaged Discharge Drainage Report record for Upper Tank Farm Tank 54. Legible dates show 2021.		

Photo No. 4	Time: 1521	
Direction Photo Taken: Close-up		
Photo Description: Upper Tank Farm BERM Water Drain Log binder.		

U.S. Environmental Protection Agency
Region 9 Oil Program

SPCC PHOTOGRAPHIC LOG

Facility Name & Location:

Joint Base Pearl Harbor Hickam / Red Hill Fuel Storage Facility

Photographer:

J Witul

Camera:

Olympus Tough TG-5

**Dates Photographs
Were Taken:**

March 1, 2022

Photo No.

1

Time:

0854

**Direction Photo
Taken:**

NW

Photo Description:

Grated drain at
entrance of Adit **REF**



Photo No.

2

Time:

0854

**Direction Photo
Taken:**

SE

Photo Description:

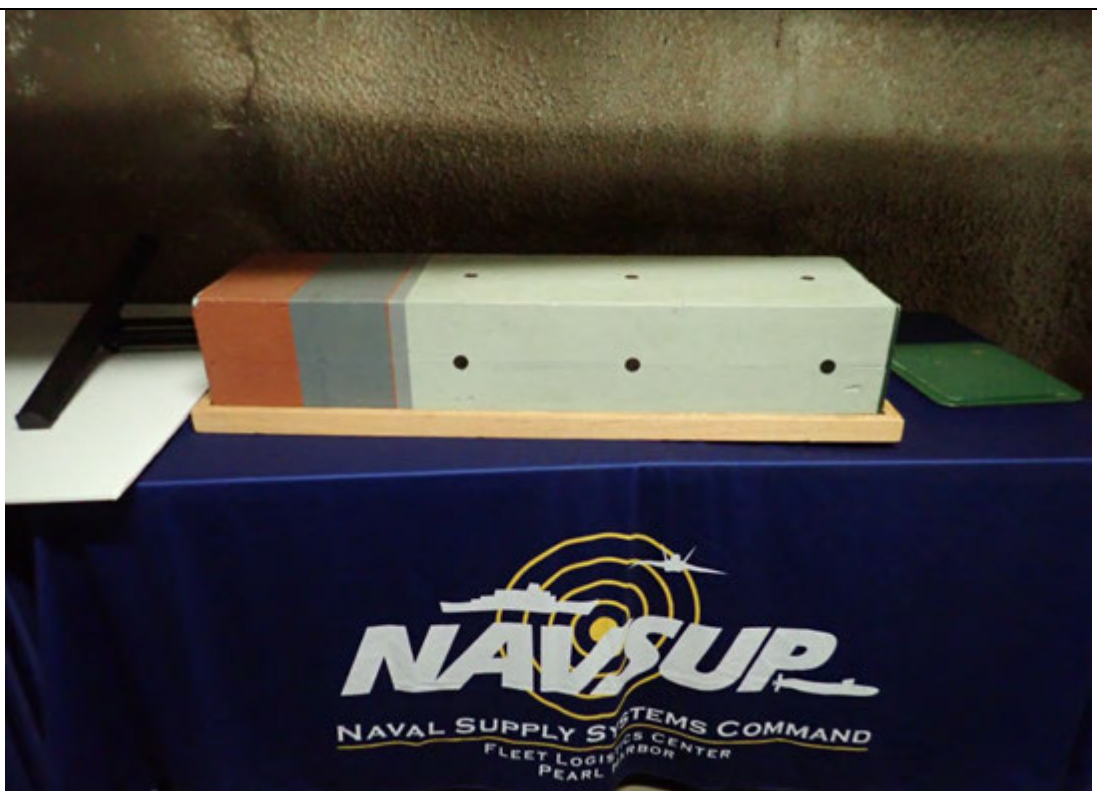
Entrance to Adit **REF**
vent line and fire
suppression piping at
right.



Photographer: WITUL	
Photo No. 3	Time: 0855
Direction Photo Taken: In Upper Tunnel	
Photo Description: Fire water header on pipe support, and vent line.	



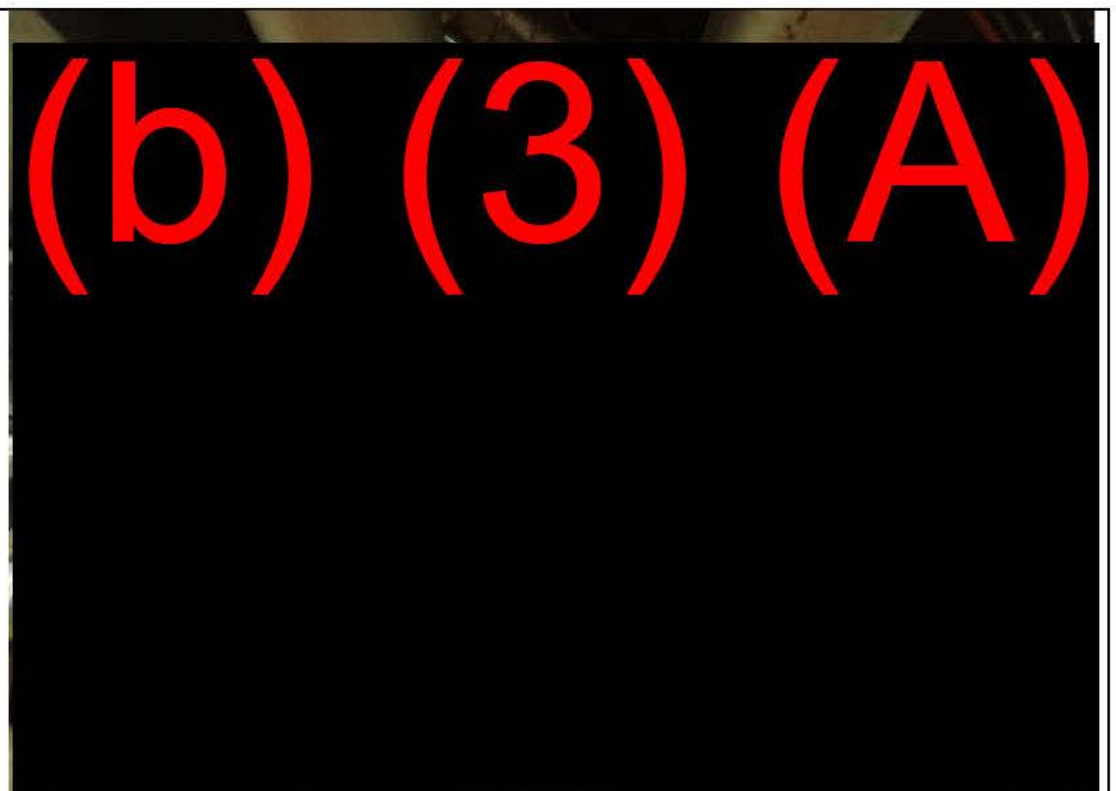
Photo No. 4	Time: 0908
Direction Photo Taken: In Upper Tunnel	
Photo Description: Representation of tunnel cross-section. Includes 1/4" steel plate at right, 30" or thicker reinforced concrete, grout and gunite, and rock surface that gunite was sprayed onto.	



Photographer: WITUL	
Photo No. 5	Time: 0909
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank construction display, exterior and cross-section.	



Photo No. 6	Time: 0912
Direction Photo Taken: In Upper Tunnel	
Photo Description: Split at Upper Tunnel; exhibition Tank 19 to right, JP-5 Tank 20 to left. At the time of the inspection, SPCC requirements were applicable to the Red Hill tanks and piping, although they were not covered by the SPCC Plan. Tunnel piping is still subject to SPCC requirements.	



Photographer: WITUL	
Photo No. 7	Time: 0923
Direction Photo Taken: In Upper Tunnel	
Photo Description: Wooden supports for piping in main area by Tank 20. Use of combustible materials around hydrocarbon systems is not good engineering practice.	

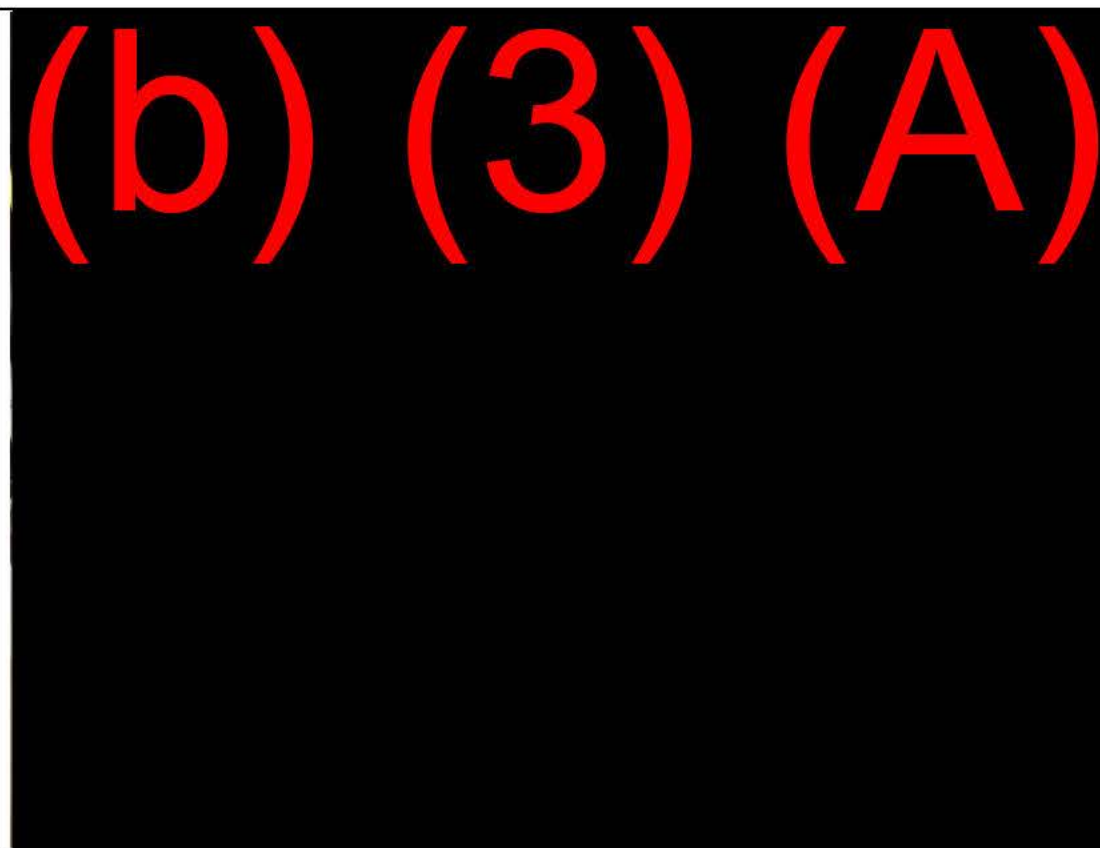
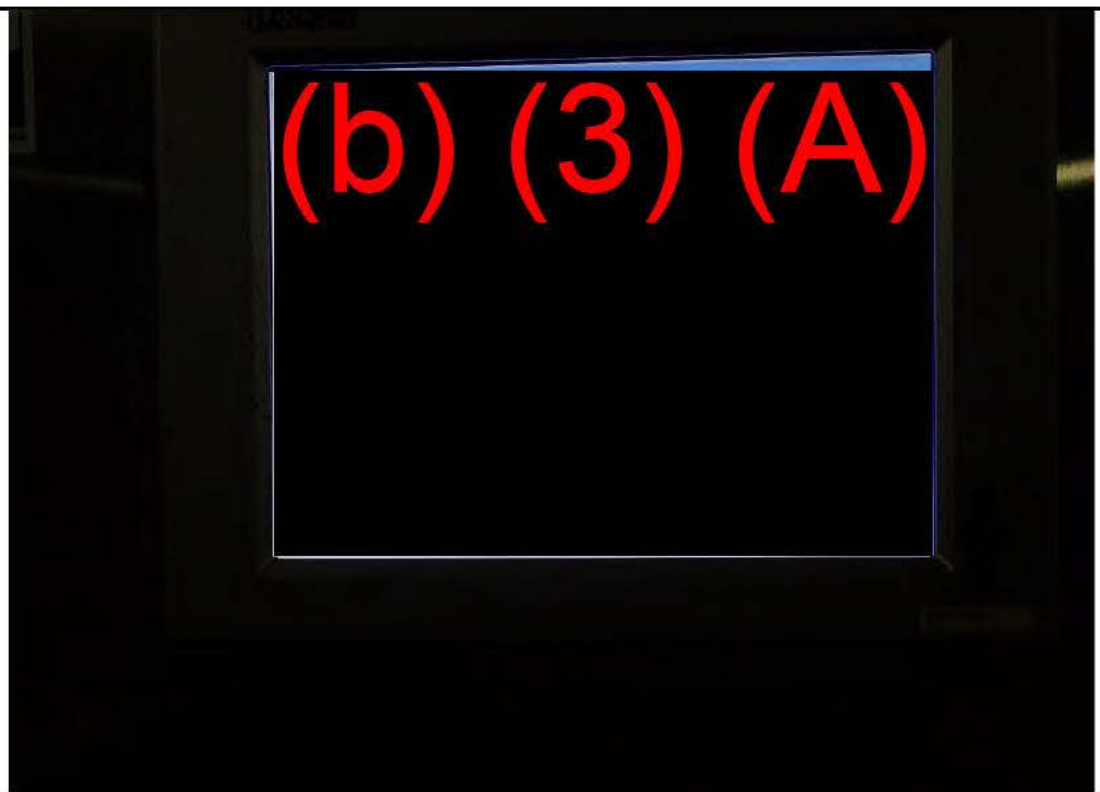


Photo No. 8	Time: 0926
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 20 display screen, indicating fill level near upper dome. Shows last update at 09:36:23; photo taken at 09:26 hrs.	



Photographer: WITUL	
Photo No. 9	Time: 0930
Direction Photo Taken: In Upper Tunnel	
Photo Description: Maintenance information on Tank 17 hatch; cleaning, inspection and repairs completed August 2021.	



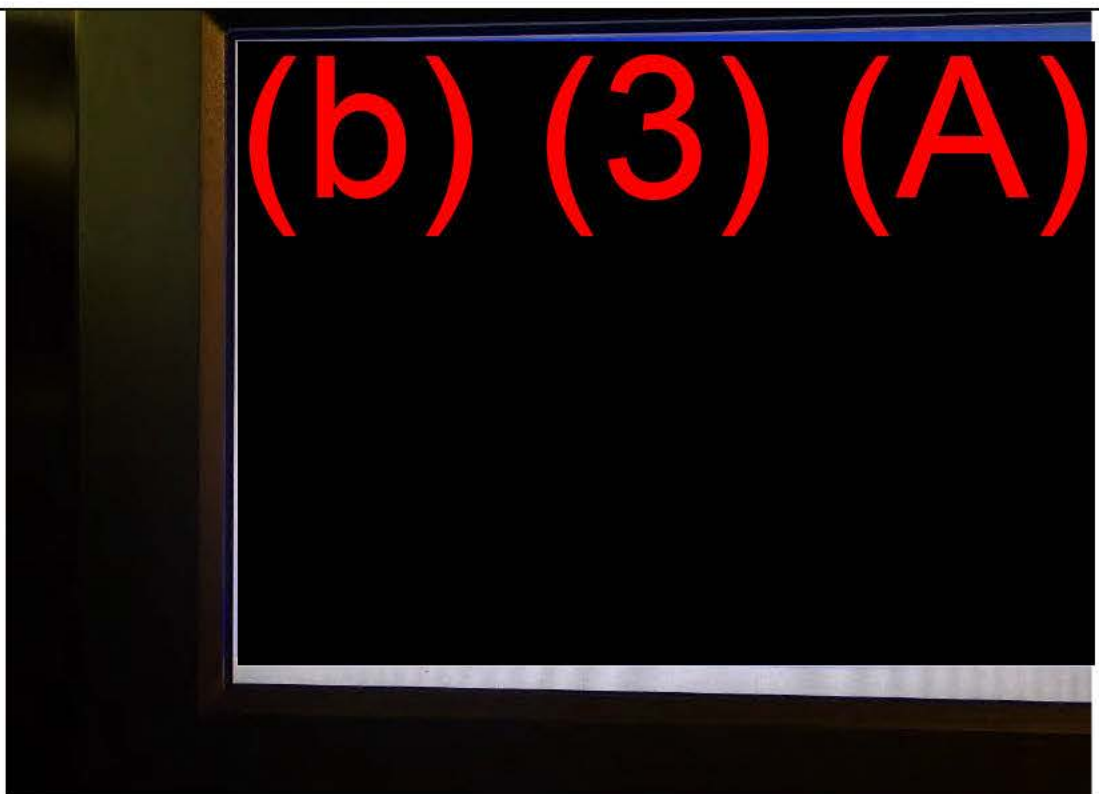
Photo No. 10	Time: 0930
Direction Photo Taken: In Upper Tunnel	
Photo Description: Gasket (green) at Tank 17 manway flange.	



Photographer: WITUL	
Photo No. 11	Time: 0931
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 17 hatch with possible welded or repaired areas.	



Photo No. 12	Time: 0933
Direction Photo Taken: In Upper Tunnel	
Photo Description: Display screen for Tank 17, indicating empty – level is approximately 5 inches.	



Photographer: WITUL	
Photo No. 13	Time: 0940
Direction Photo Taken: In Upper Tunnel	
Photo Description: Upper dome of Tank 18, currently under maintenance. Reported approximate fill level is double course at lower edge of light green band.	

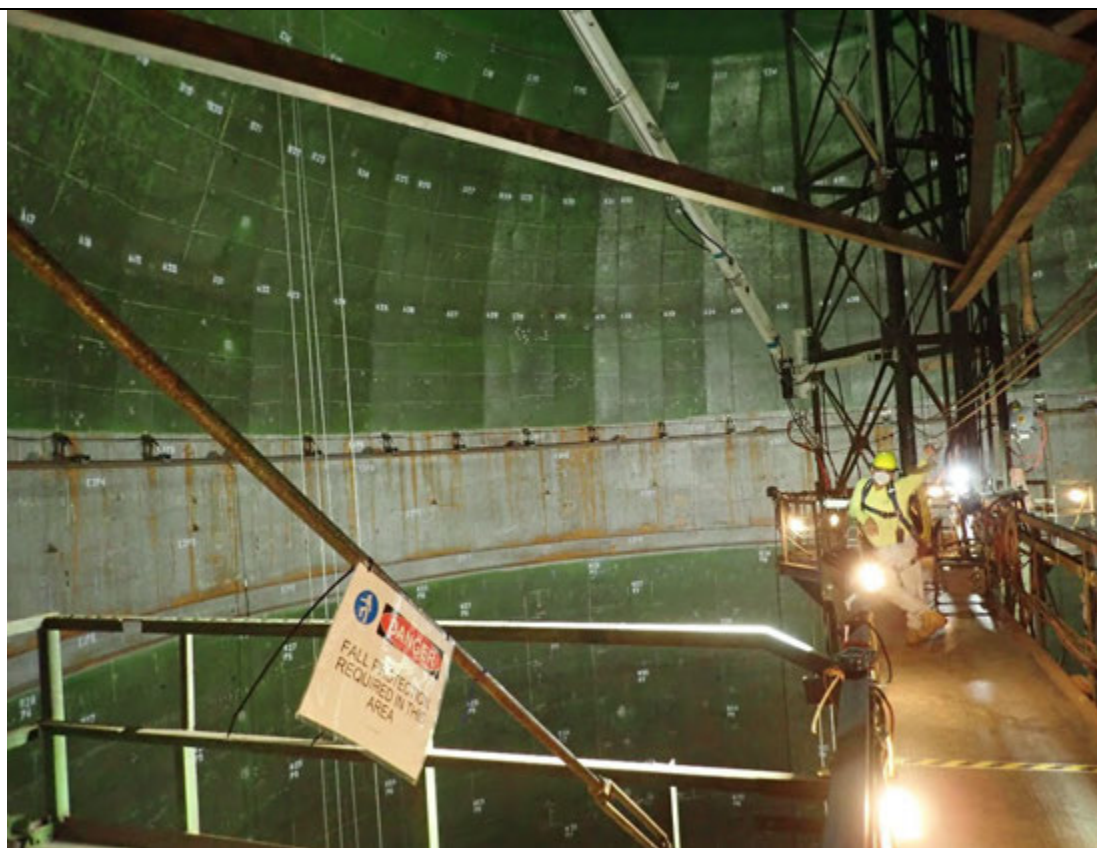
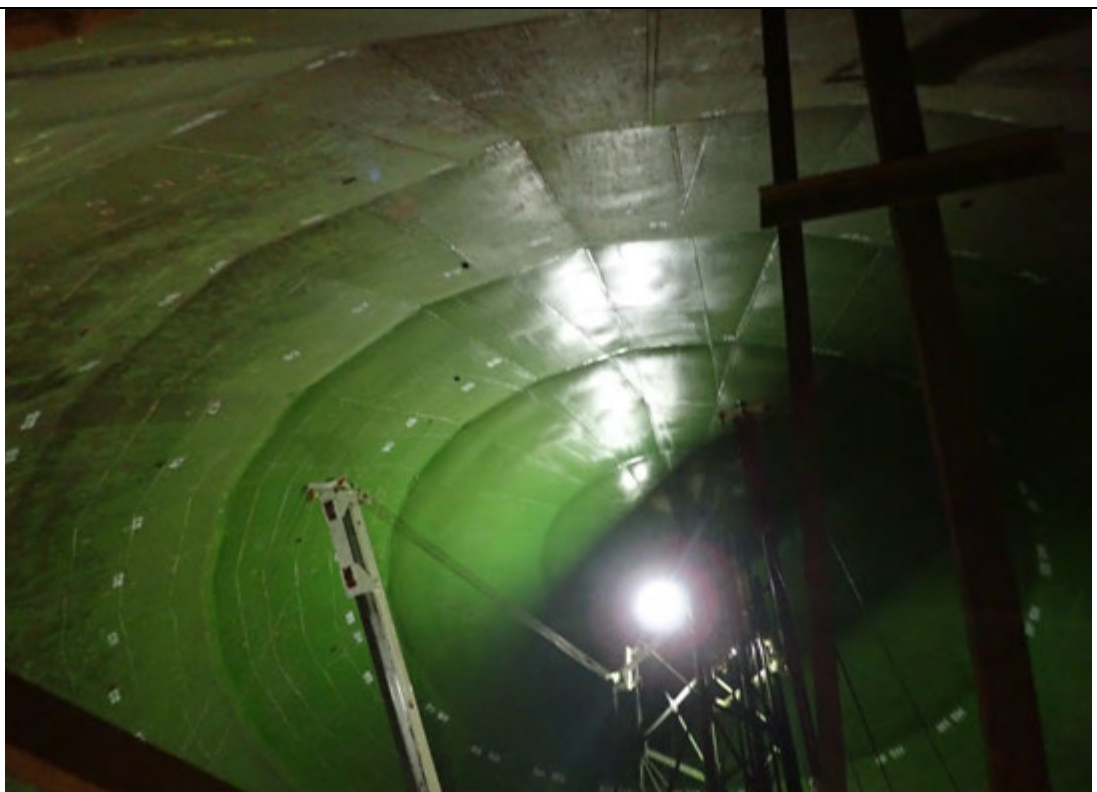
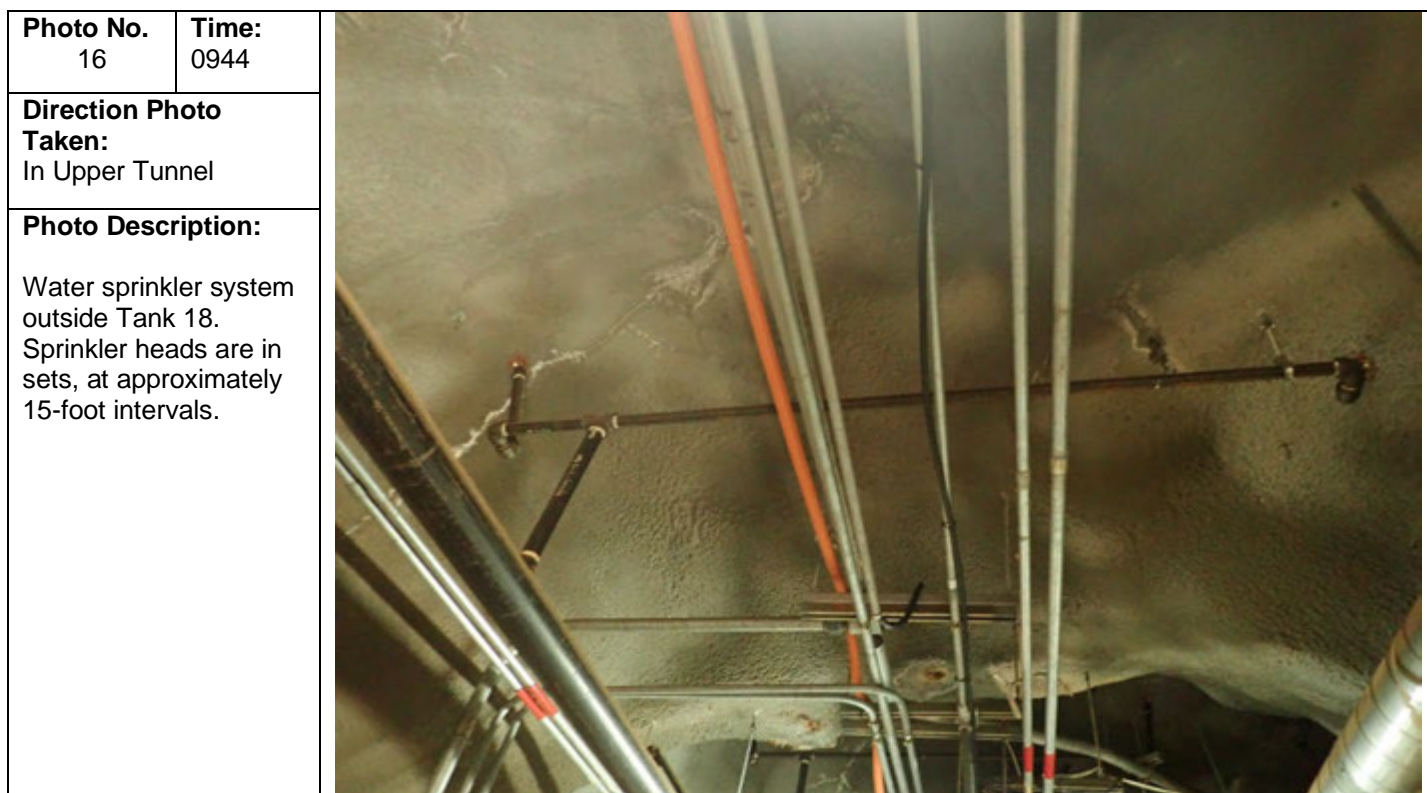


Photo No. 14	Time: 0941
Direction Photo Taken: In Upper Tunnel	
Photo Description: Inside Tank 18 upper dome, showing recoated area.	





Photographer: WITUL	
Photo No. 17	Time: 0949
Direction Photo Taken: In Upper Tunnel	
Photo Description: Display screen for Tank 15. Last update also shows time later than when photo was taken.	

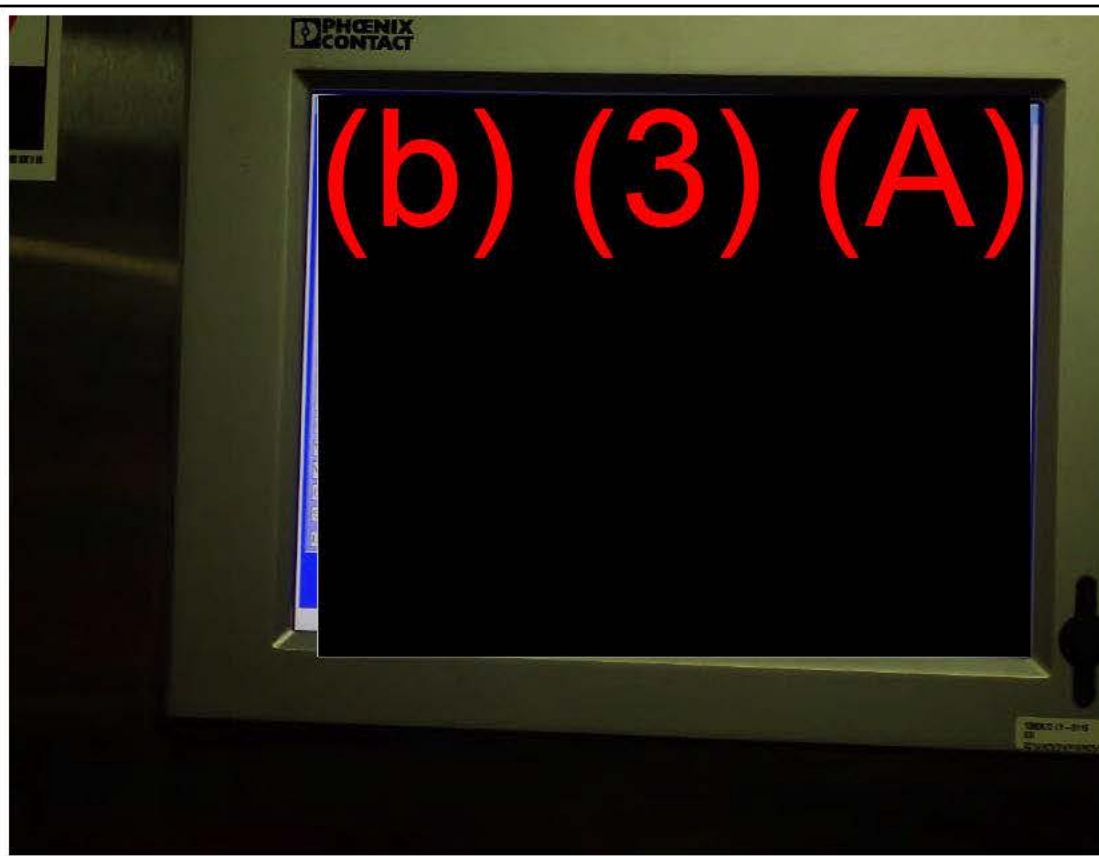
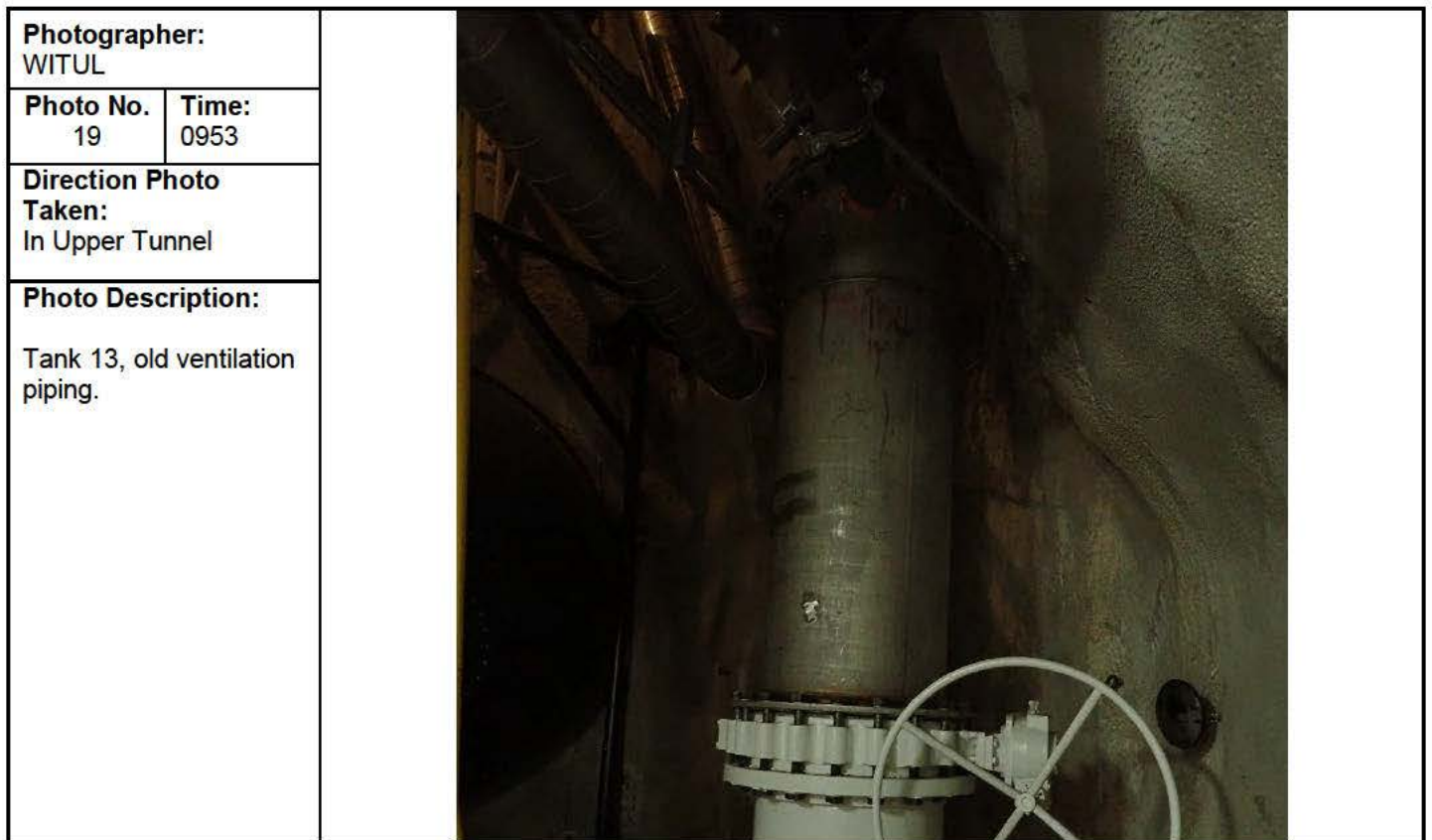


Photo No. 18	Time: 0951
Direction Photo Taken: In Upper Tunnel	
Photo Description: Maintenance information on Tank 13 hatch; cleaning, inspection and repairs completed November 2021.	





Photographer: WITUL	
Photo No. 21	Time: 0957
Direction Photo Taken: In Upper Tunnel	
Photo Description: Display screen for Tank 11.	

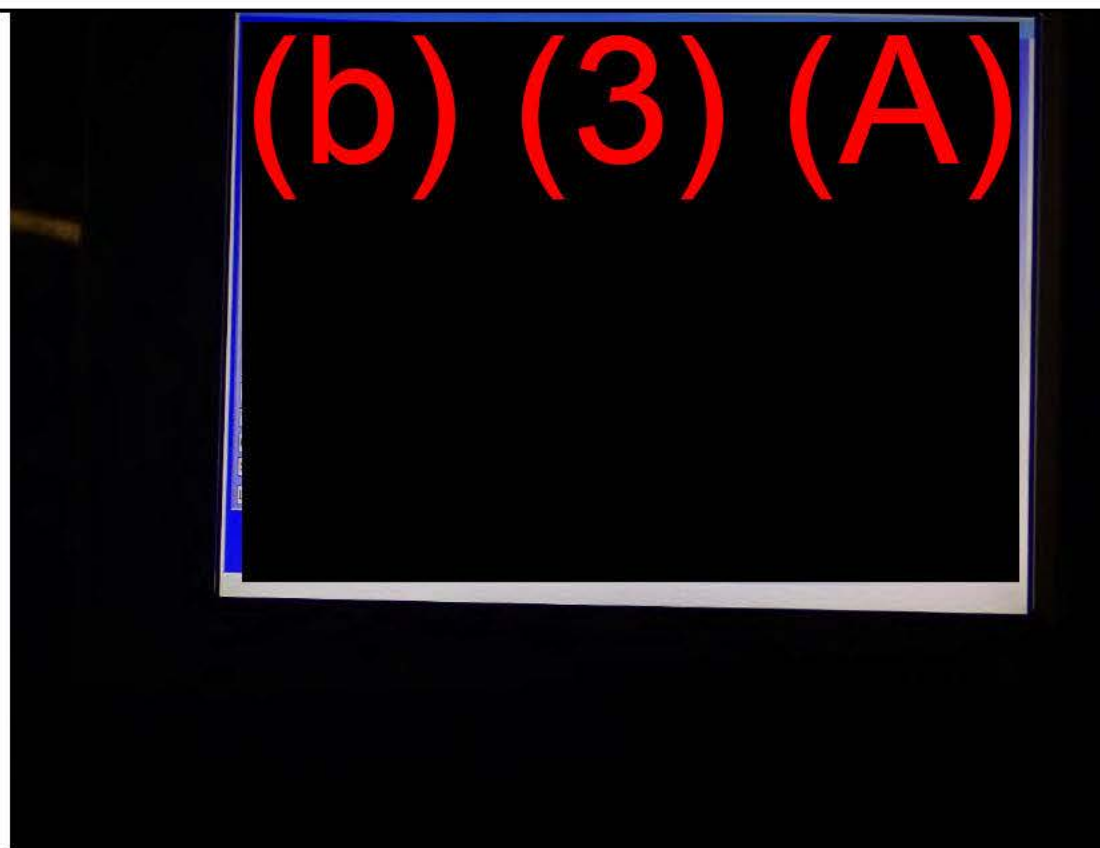


Photo No. 22	Time: 0958
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 11 Upper hatch and manway with discoloration reminiscent of weeping below hatch and step. A strong odor was evident in this area.	



Photographer: WITUL	
Photo No. 23	Time: 0959
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 9 display screen, indicating fill level near upper dome.	

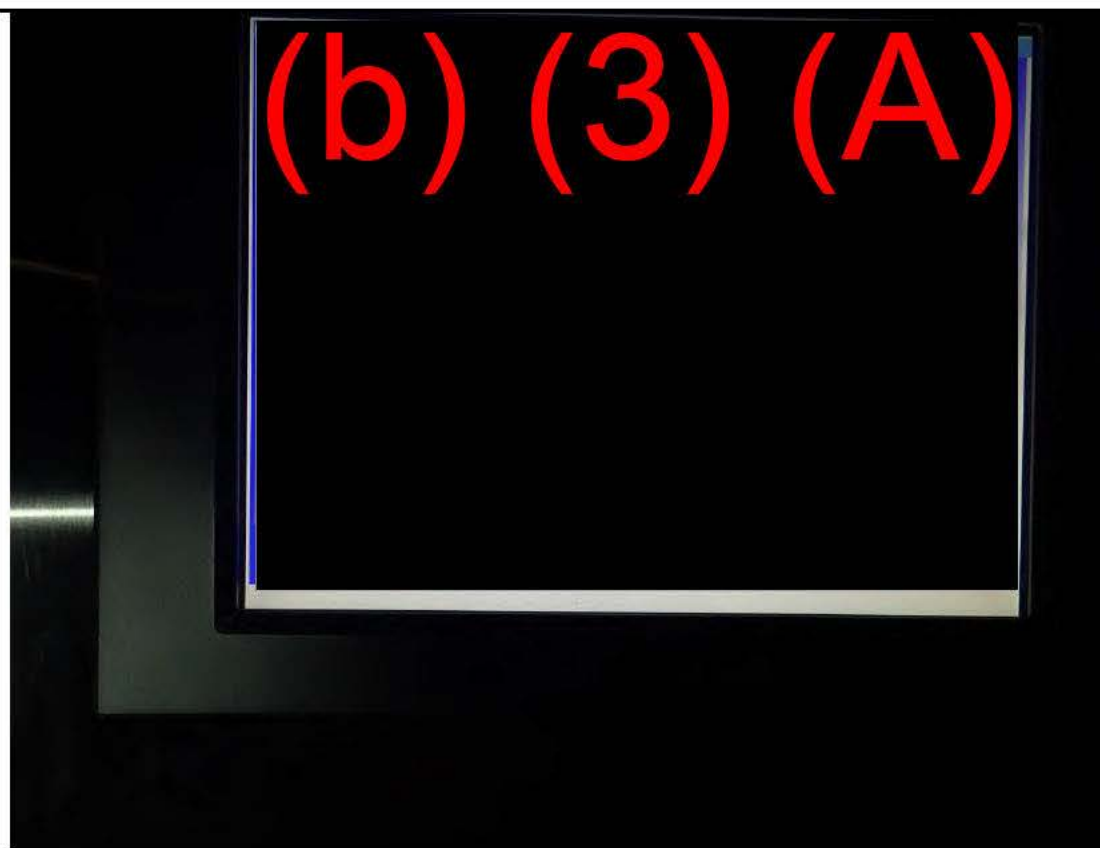


Photo No. 24	Time: 1001
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 9 manway flange on hatch. Bottom six bolts have extra plate behind washers, reportedly for extra torque.	



Photographer: WITUL	
Photo No. 25	Time: 1001
Direction Photo Taken: In Upper Tunnel	
Photo Description: Gasket visible at Tank 9 manway blank flange.	

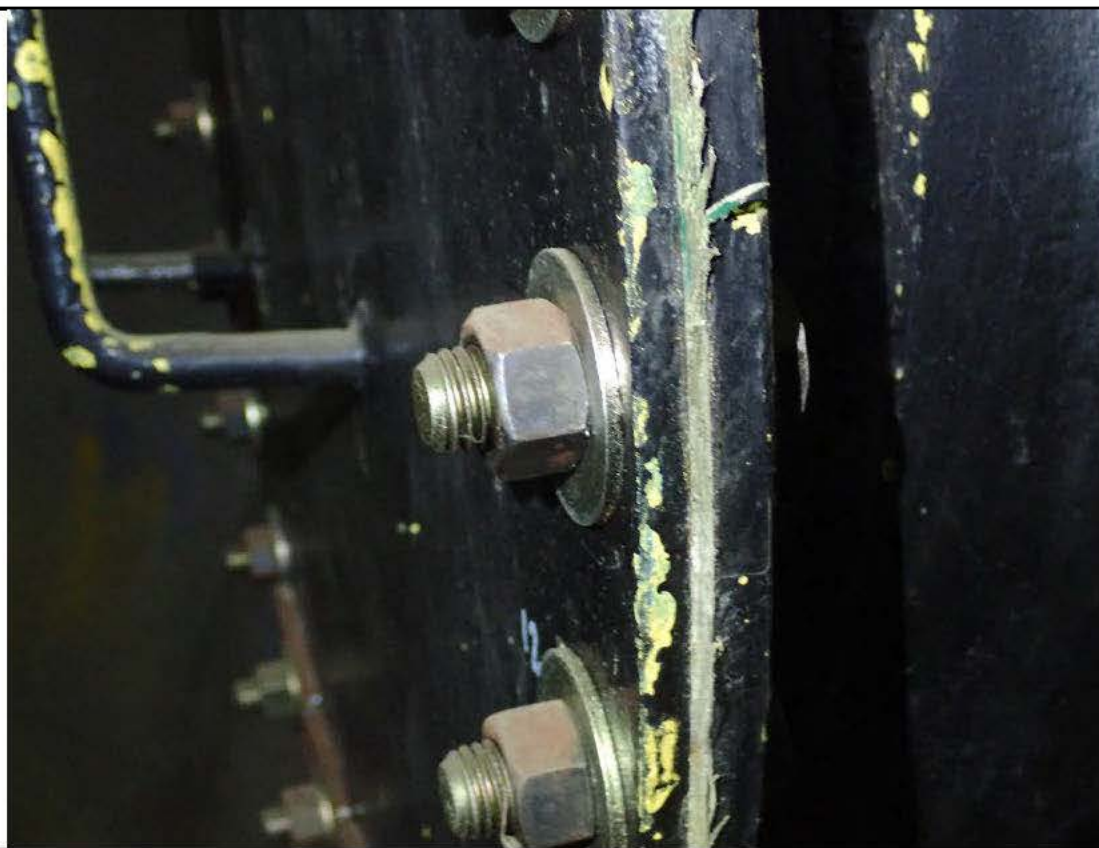
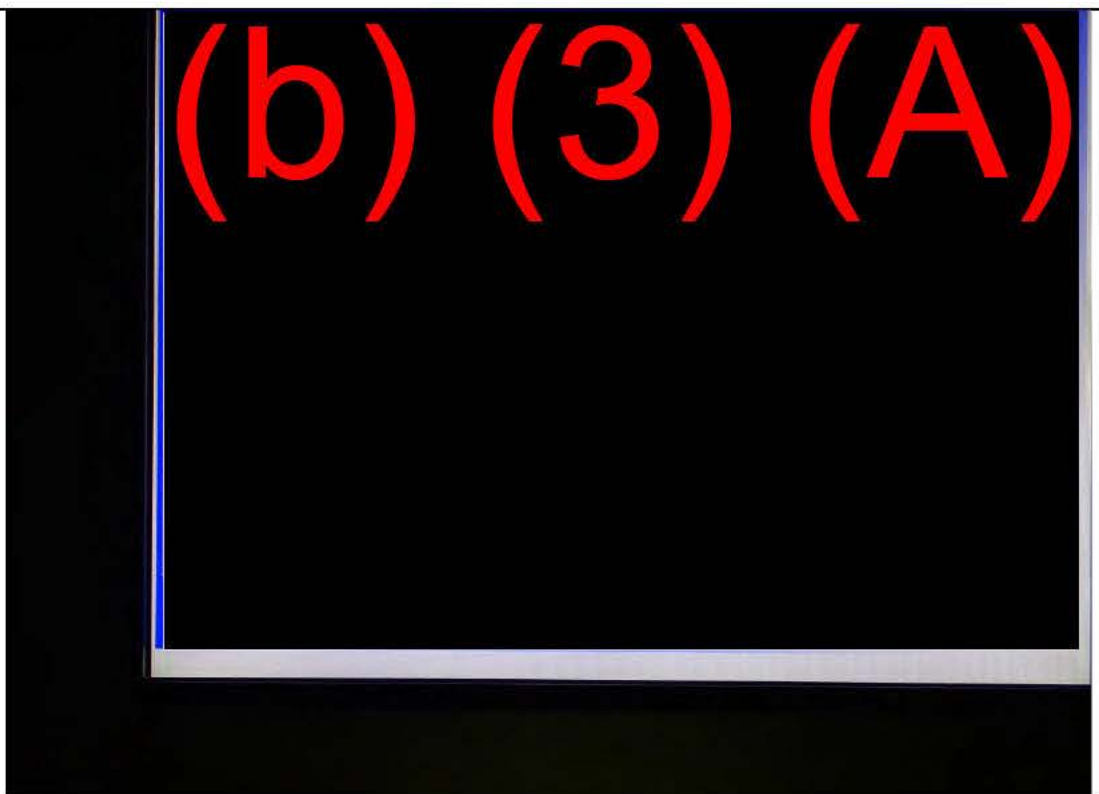


Photo No. 26	Time: 1003
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 7 display screen.	



Photographer: WITUL	
Photo No. 27	Time: 1003
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 7 manway flange, showing completion date of 9-18-98 for work performed by Dames & Moore. .	



Photo No. 28	Time: 1005
Direction Photo Taken: In Upper Tunnel	
Photo Description: Information on Tank 5 manway flange, showing cleaning, inspection and repair completed Oct 2019.	



Photographer: WITUL	
Photo No. 29	Time: 1006
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 5 screen display; update time later than time photo was taken.	

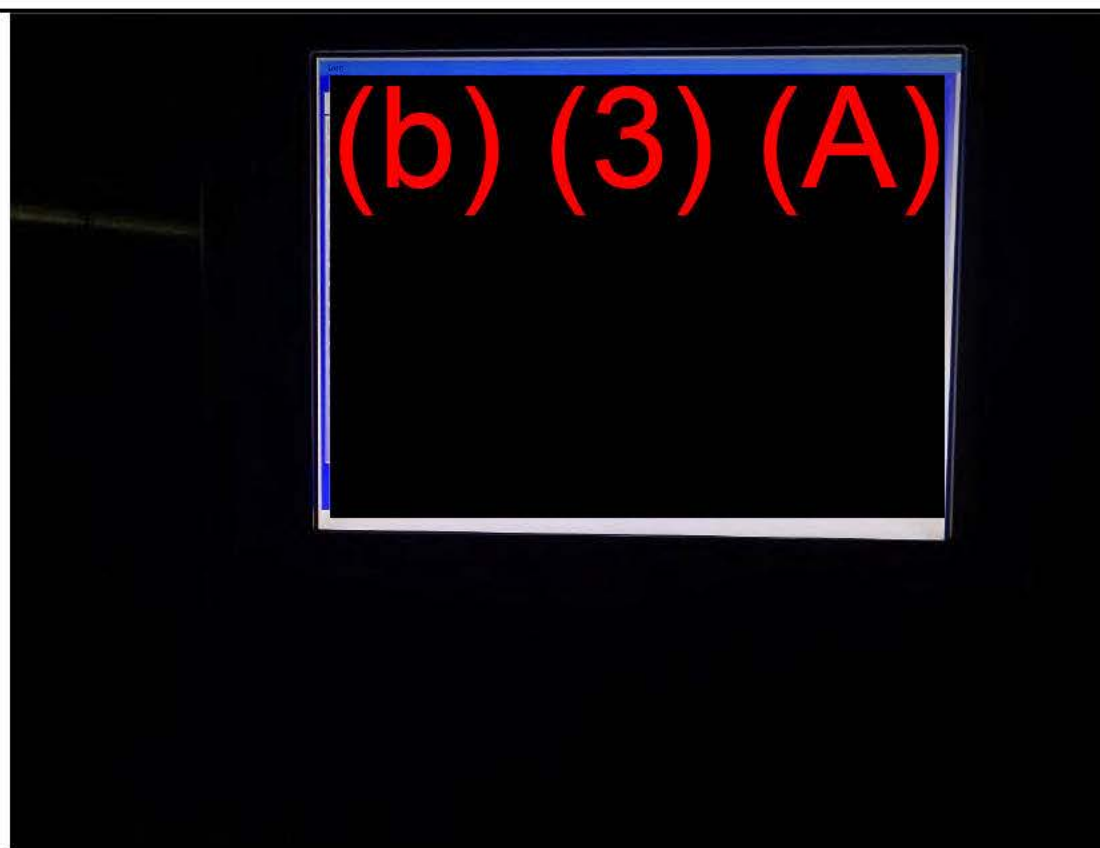
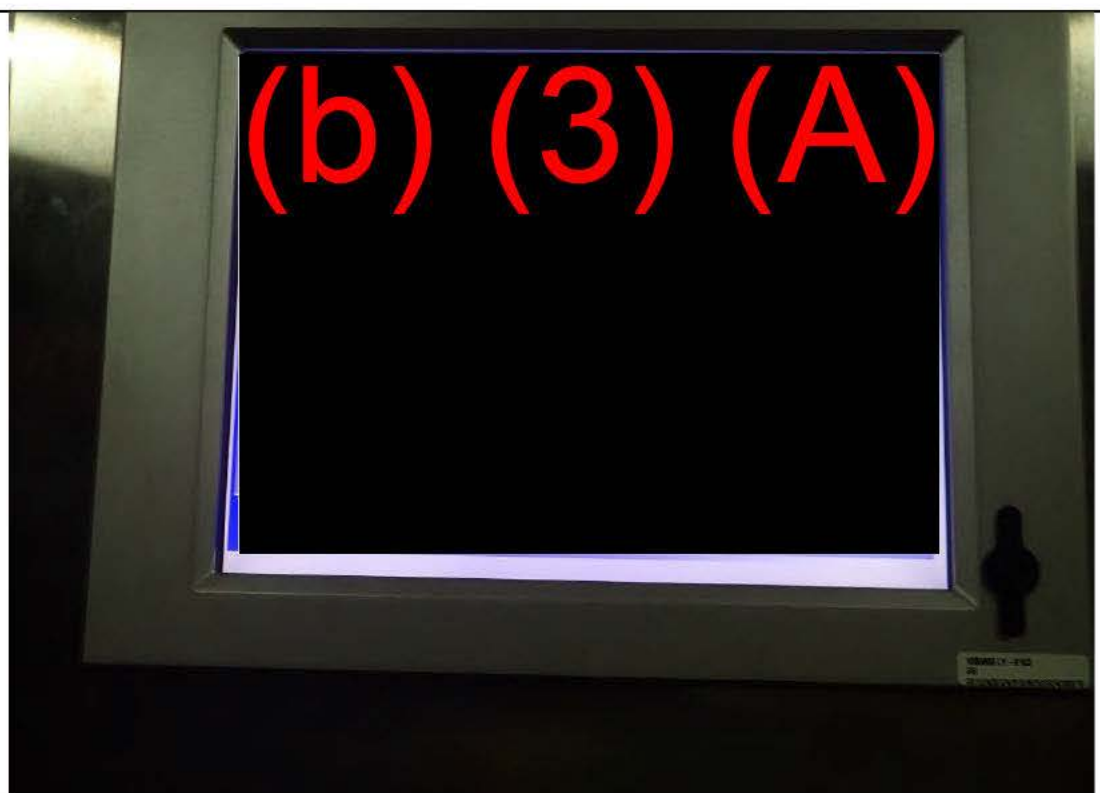


Photo No. 30	Time: 1007
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 3 screen display; update time later than time photo was taken.	





Photographer: WITUL	
Photo No. 33	Time: 1011
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 4 hatch with gasket visible past bolts, additional view.	



Photo No. 34	Time: 1012
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 4 manway flange, no gasket visible.	



Photographer: WITUL	
Photo No. 35	Time: 1012
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 4 screen display.	

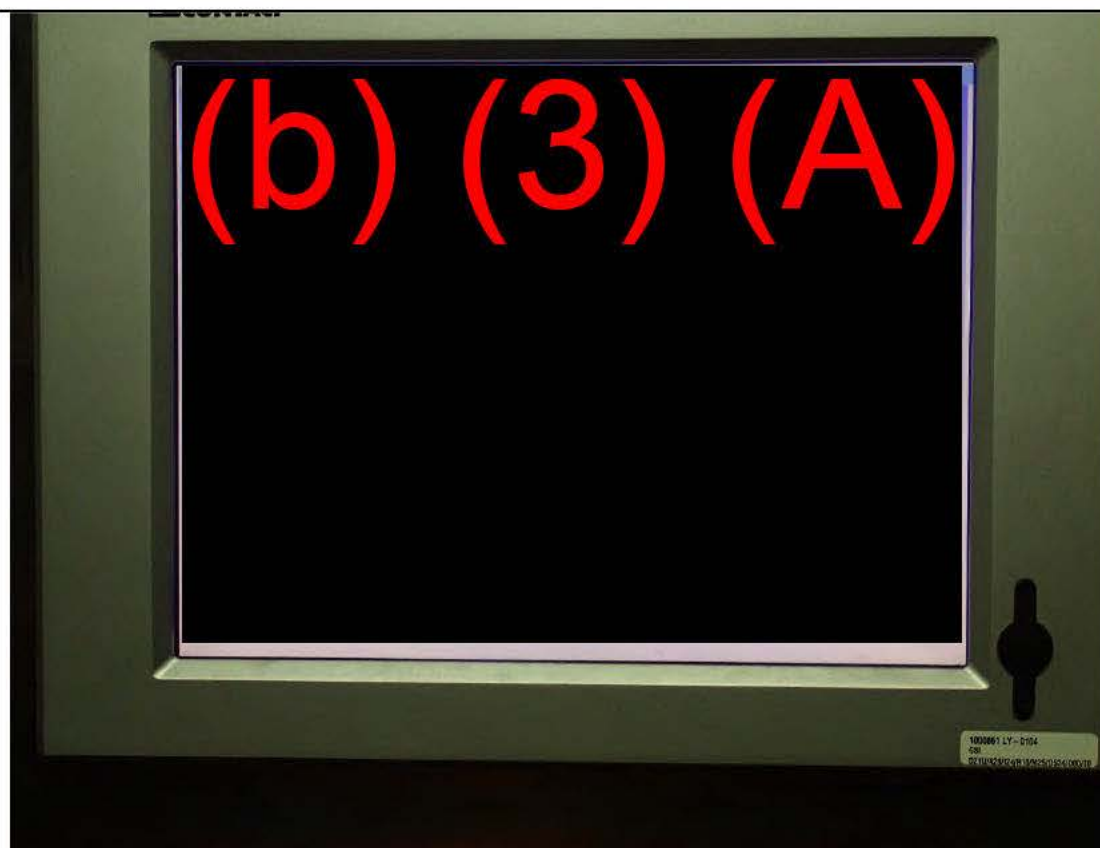
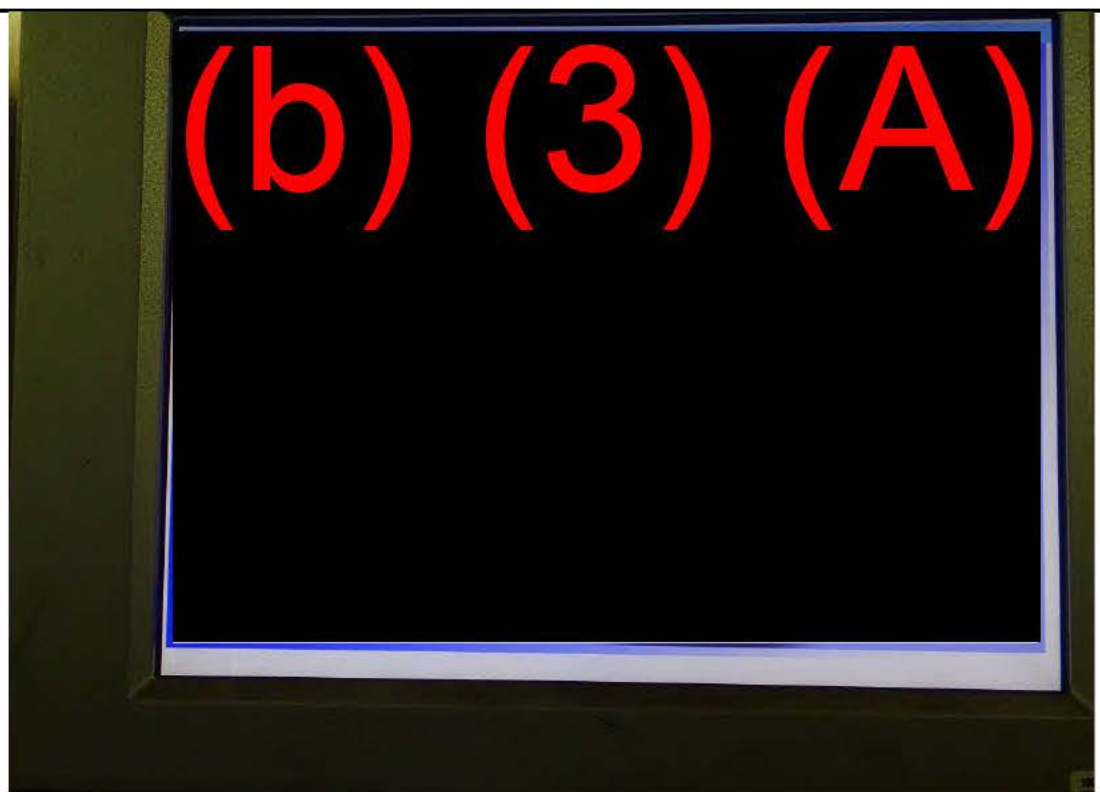


Photo No. 36	Time: 1015
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 2 screen display; level appears to be in upper dome area. Tanks are reportedly not filled to this height, and tank level and ullage level values do not appear to match graphic representation of tank.	



Photographer: WITUL	
Photo No. 37	Time: 1015
Direction Photo Taken: In Upper Tunnel	
Photo Description: Tank 2 hatch and manway flange – gaskets were visible on both.	



Photo No. 38	Time: 1031
Direction Photo Taken: In Upper Tunnel	
Photo Description: Hole in gunite floor between tracks by elevator.	





Photographer: WITUL		
Photo No. 39	Time: 1031	
Direction Photo Taken: In Upper Tunnel		
Photo Description: Thickness of gunite visible at side of hole in floor.		

Photo No. 40	Time: 1033	
Direction Photo Taken: In Upper Tunnel		
Photo Description: Tracks and hole in floor, near tunnel elevator upper door.		

Photographer: WITUL	
Photo No. 41	Time: 1037
Direction Photo Taken: In Lower Tunnel	
Photo Description: Trench drains at Tank 19 and Tank 20 junction.	

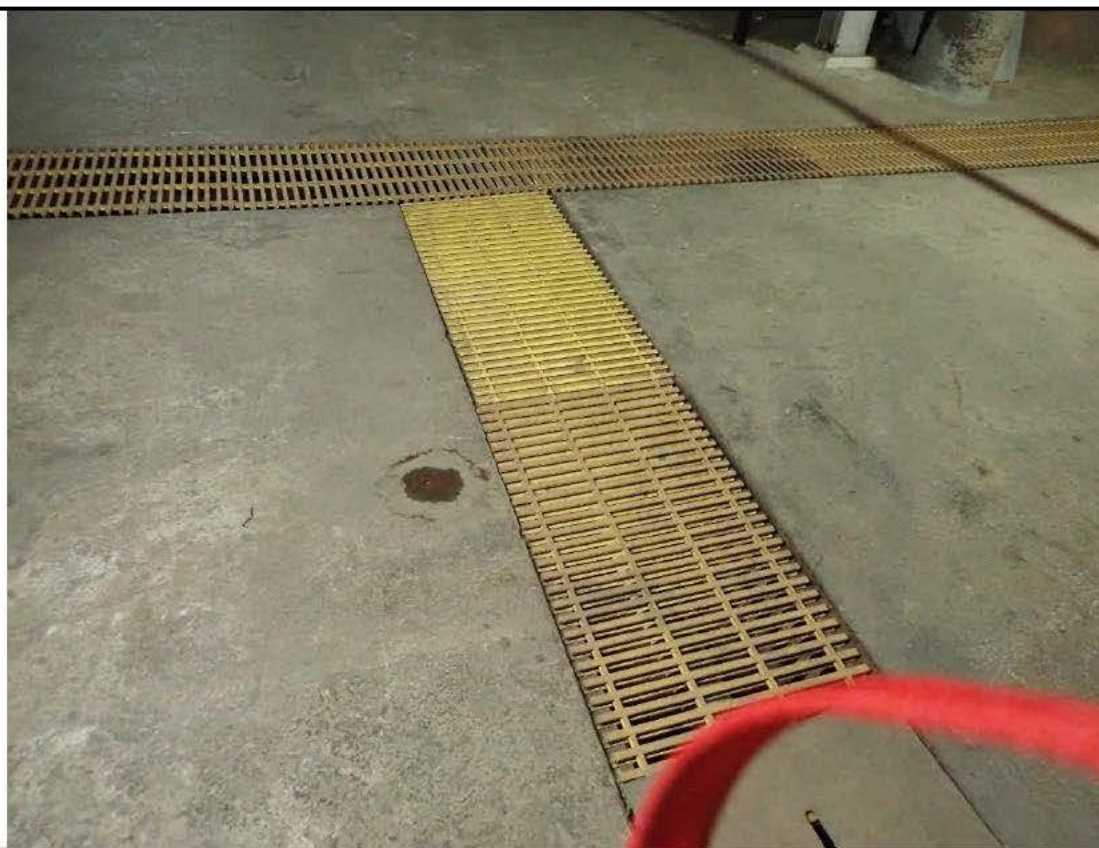
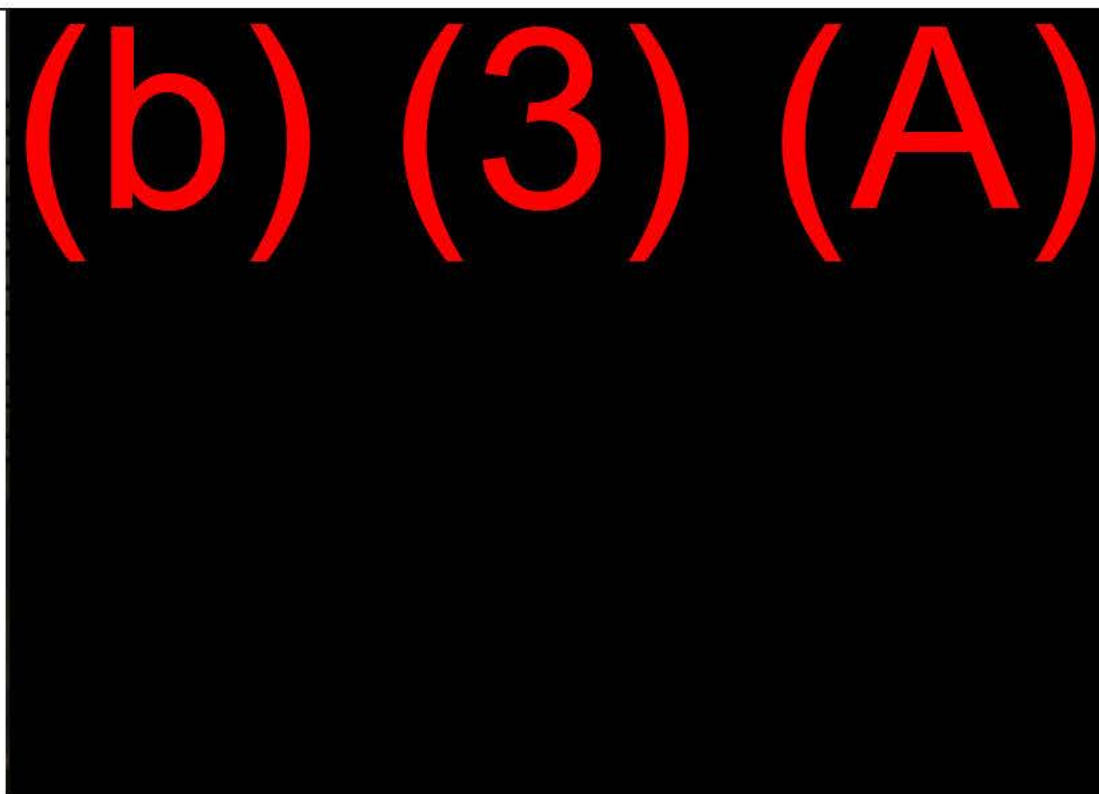


Photo No. 42	Time: 1041
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sampling drain lines at Tank 19; not operative for exhibition tank.	



Photographer: WITUL	
Photo No. 43	Time: 1048
Direction Photo Taken: In Lower Tunnel	
Photo Description: One side of pipe at Tank 20, with open blank, and duct dented by pipe movement during May 6, 2021 incident.	

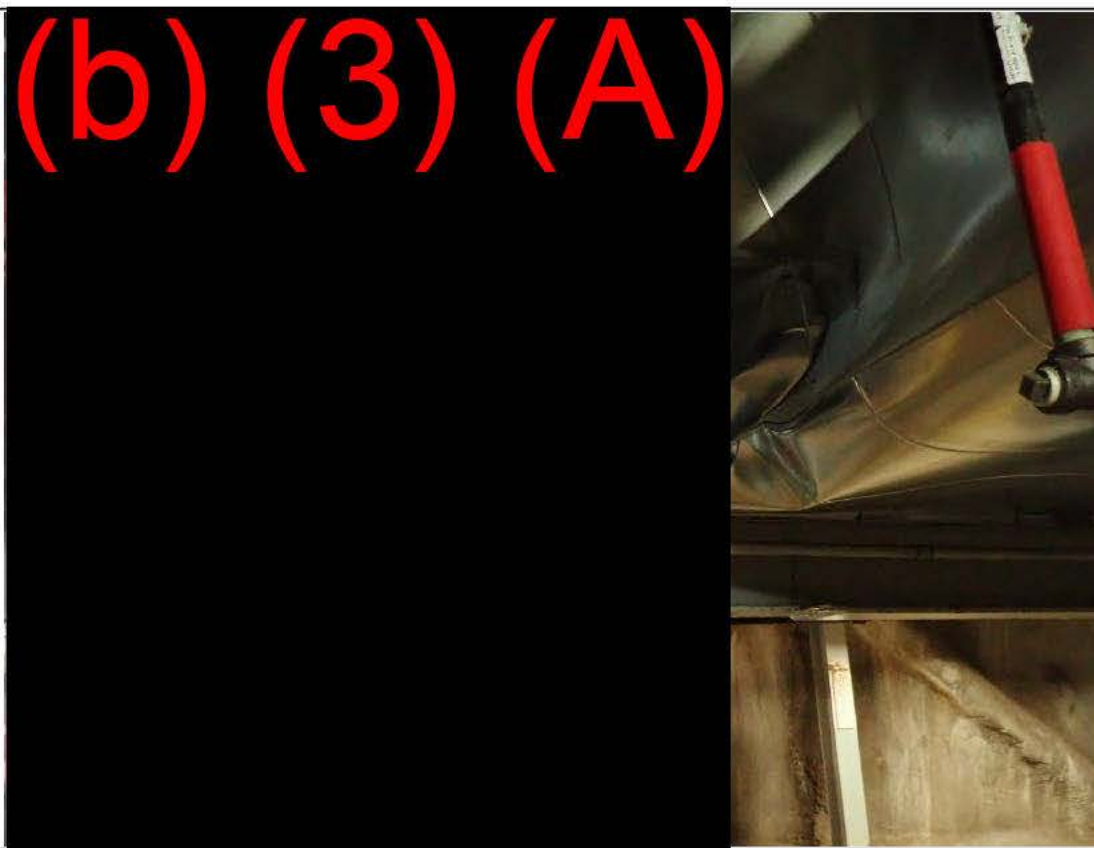
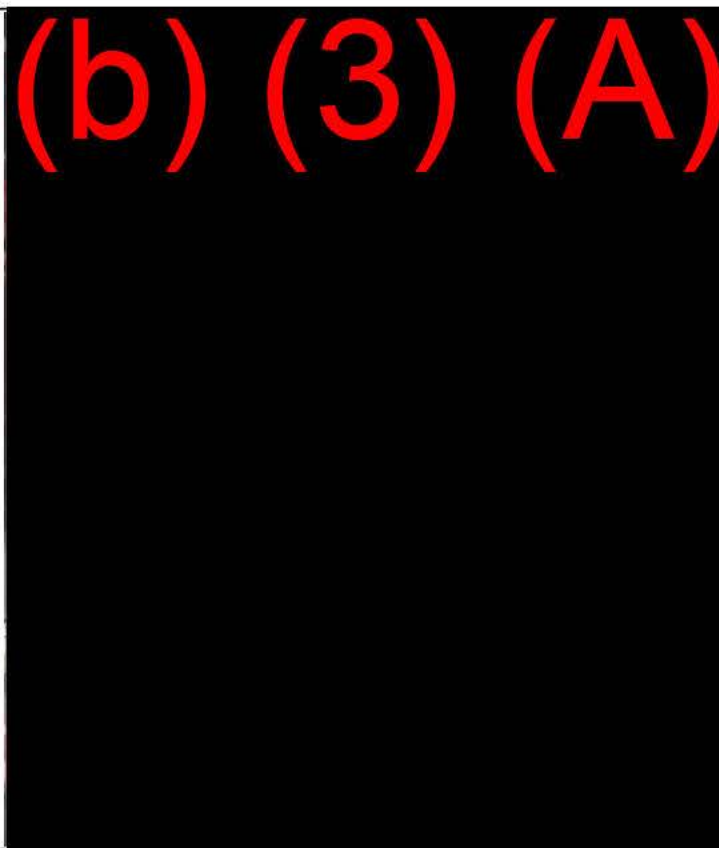
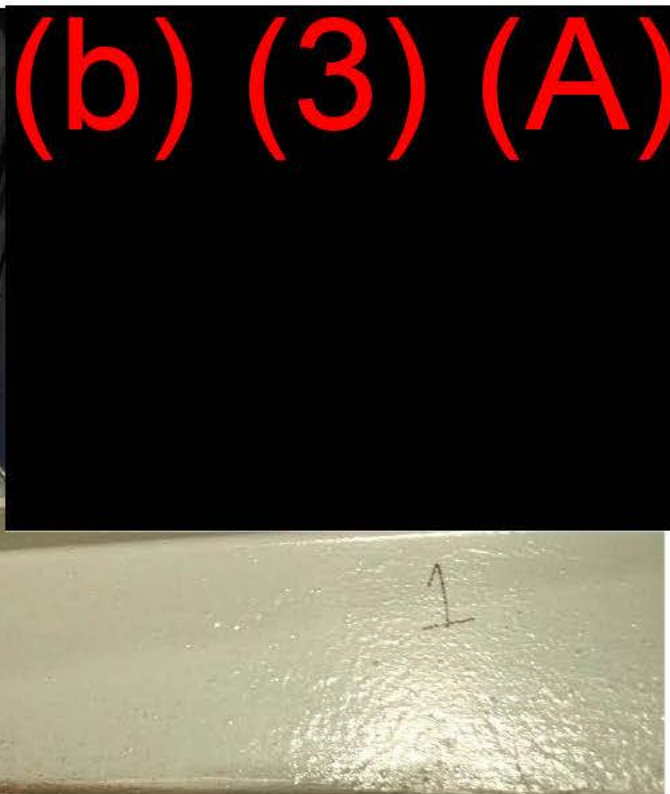


Photo No. 44	Time: 1048
Direction Photo Taken: In Lower Tunnel	
Photo Description: Bottom side of pipe, and crushed duct.	



Photographer: WITUL	
Photo No. 45	Time: 1050
Direction Photo Taken: In Lower Tunnel	
Photo Description: Jet fuel piping.	

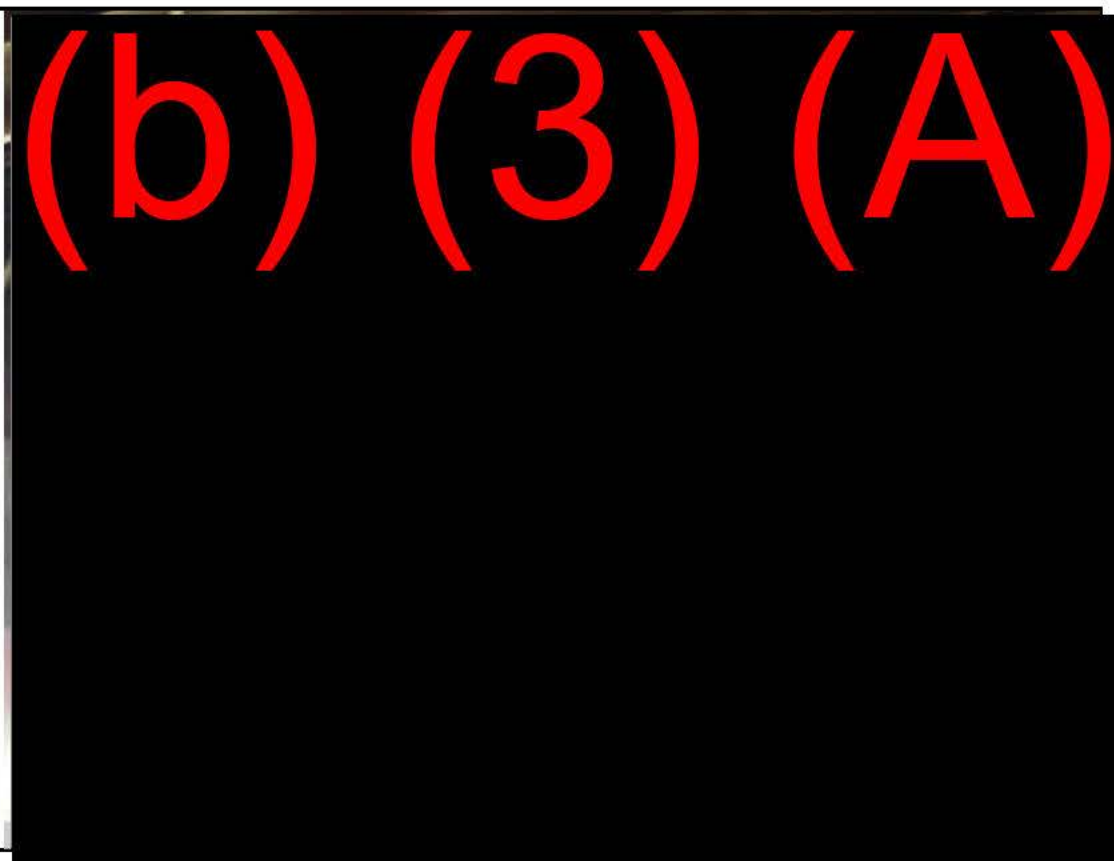
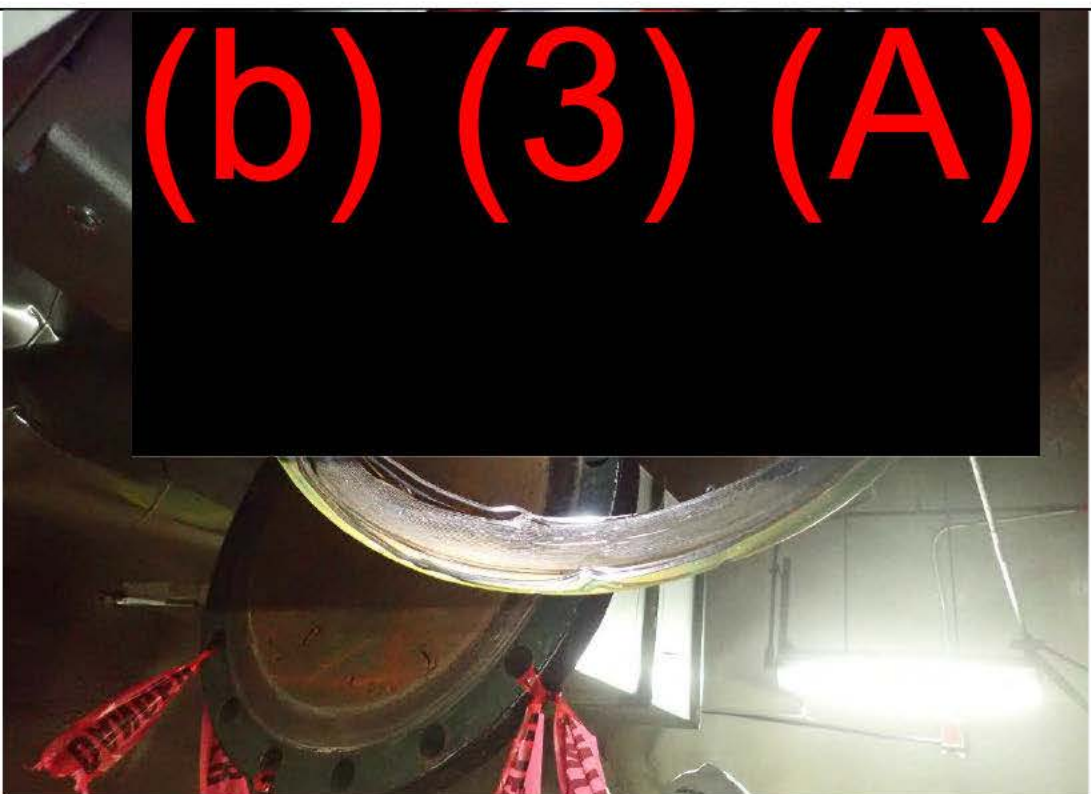


Photo No. 46	Time: 1052
Direction Photo Taken: In Lower Tunnel	
Photo Description: Damaged spiral-wound gasket.	



Photographer: WITUL	
Photo No. 47	Time: 1052
Direction Photo Taken: In Lower Tunnel	
Photo Description: Close-up view of failed spiral-wound gasket.	

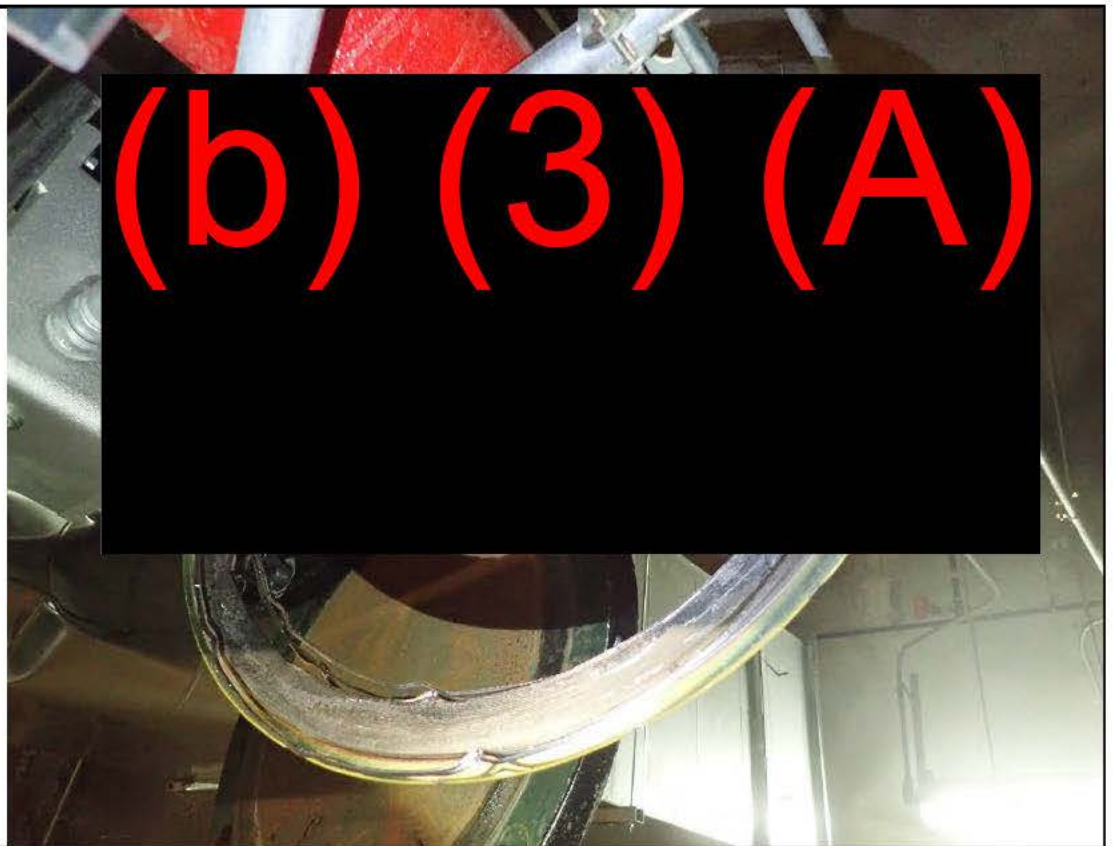


Photo No. 48	Time: 1056
Direction Photo Taken: In Lower Tunnel	
Photo Description: Aqueous Film Forming Foam (AFFF) proportioning system, Zone 1.	



Photographer: WITUL	
Photo No. 49	Time: 1059
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 18 end of line at left, where end was forced off during May 2021 incident.	




Photo No. 50	Time: 1101
Direction Photo Taken: In Lower Tunnel	
Photo Description: Two of four pumps visible below grate over AFFF fire water sump, at one of five such sumps in lower tunnel. Sump was full to grate in May 6 incident.	



Photographer: WITUL		
Photo No. 51	Time: 1107	
Direction Photo Taken: In Lower Tunnel		
Photo Description: Drain in trench, possibly to Fuel Oil Recovery (FOR) sump.		

Photo No. 52	Time: 1108
Direction Photo Taken: In Lower Tunnel	
Photo Description: Fuel oil recovery sump with approximately 2" standing liquid.	

A photograph taken from an elevated position looking down into a rectangular concrete sump. The sump contains a dark, still liquid, likely fuel oil, which is approximately 2 inches deep. Several mechanical components are visible inside the sump, including a large white cylindrical float valve on the right and a metal strainer or filter at the bottom. A metal grate is visible in the foreground, partially covering the sump's opening. The surrounding concrete floor is aged and shows some staining.

Photographer: WITUL	
Photo No. 53	Time: 1109
Direction Photo Taken: In Lower Tunnel	
Photo Description: Fuel oil recovery sump with approximately 2" standing liquid, additional view.	



Photo No. 54	Time: 1112
Direction Photo Taken: In Lower Tunnel	
Photo Description: Overview of grated trench drain.	



Photographer: WITUL	
Photo No. 55	Time: 1113
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sampling port at sump pumps.	

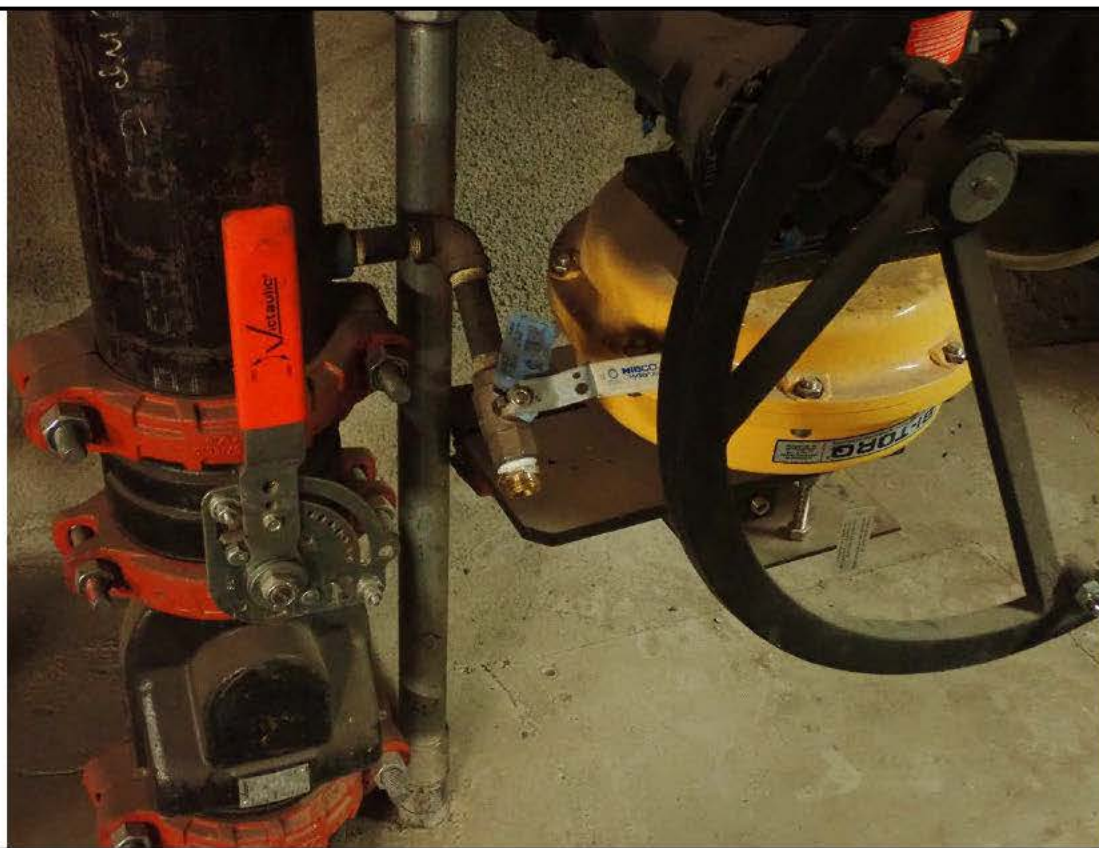
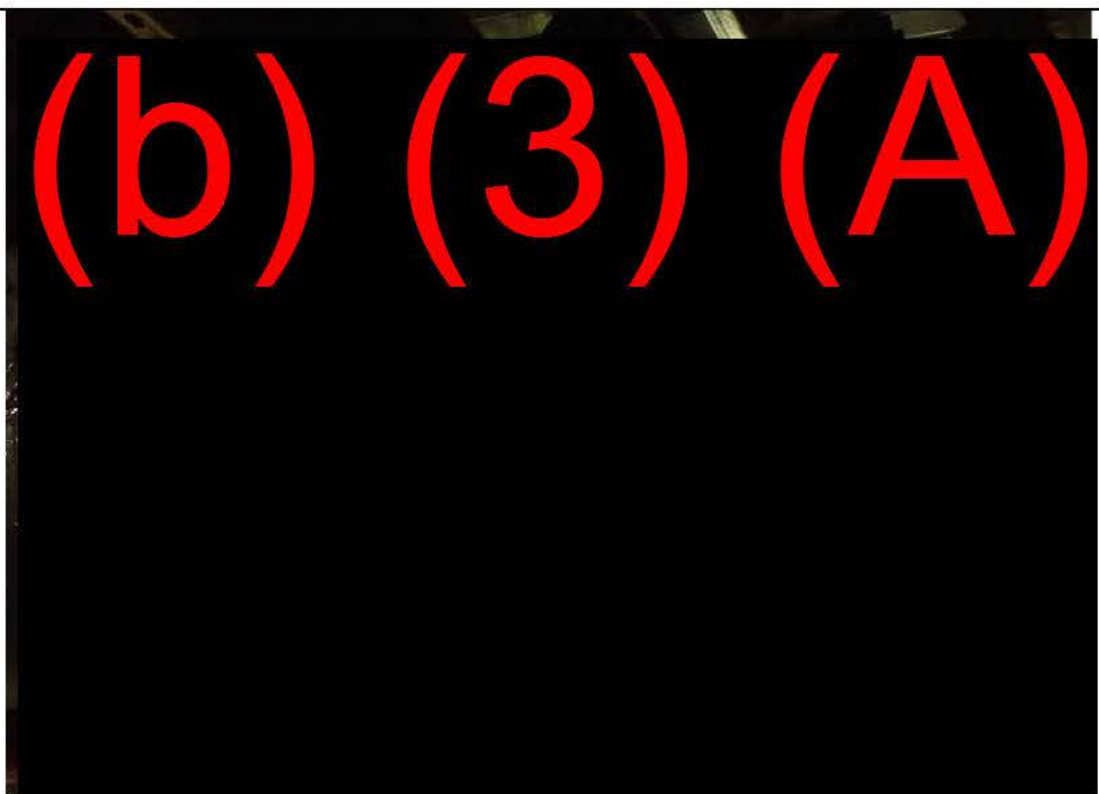


Photo No. 56	Time: 1116
Direction Photo Taken: In Lower Tunnel	
Photo Description: Start of line for F76 (diesel), currently empty.	



Photographer: WITUL	
Photo No. 57	Time: 1118
Direction Photo Taken: In Lower Tunnel	
Photo Description: JP-5 line; F-76 line at cross junction.	

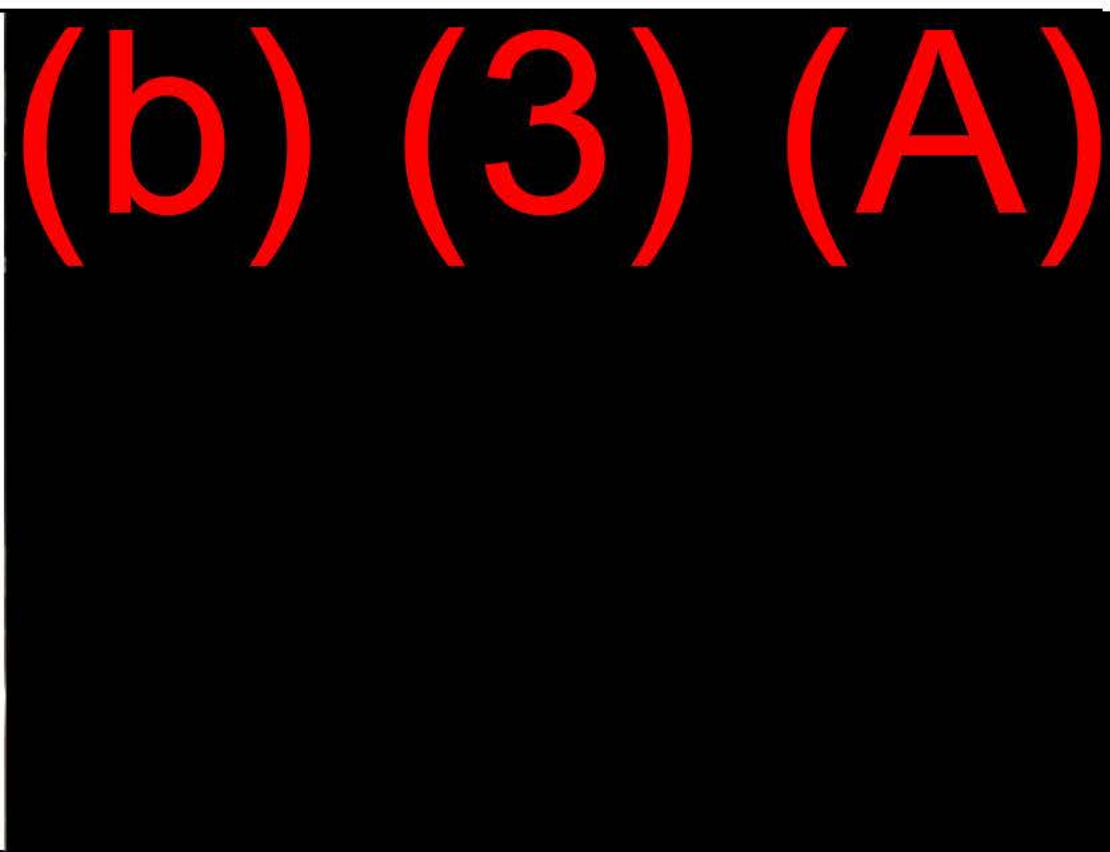


Photo No. 58	Time: 1120
Direction Photo Taken: In Lower Tunnel	
Photo Description: Drain lines in grates between Tanks 15 and Tank 16.	



Photographer: WITUL	
Photo No. 59	Time: 1121
Direction Photo Taken: In Lower Tunnel	
Photo Description: Dresser coupling on piping from Tank 16, with typical thermal insulation and insulation blanket shielding.	

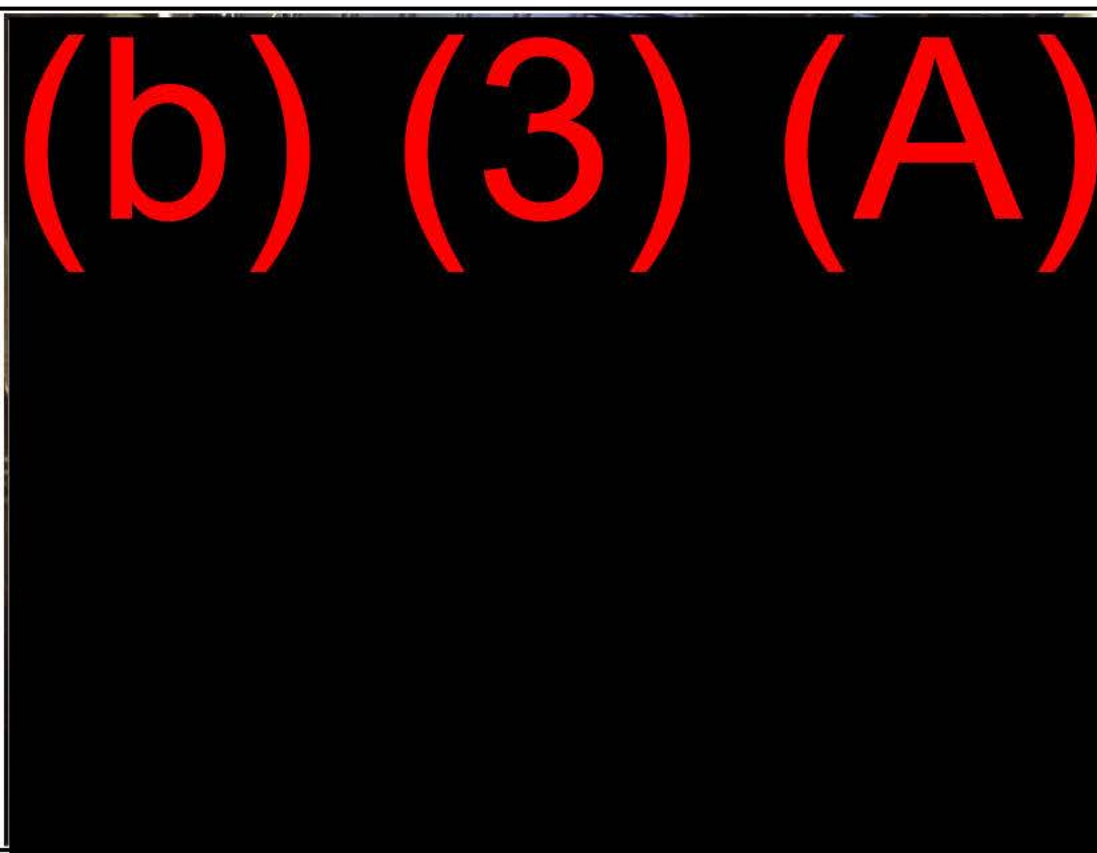
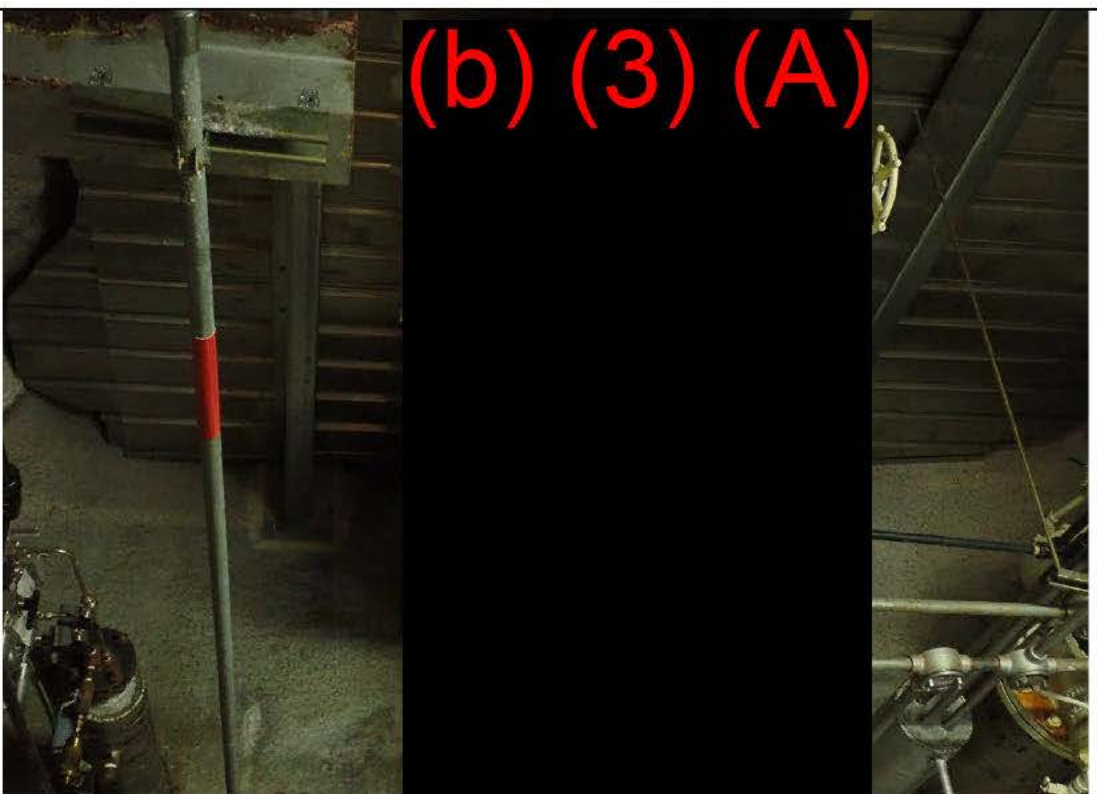


Photo No. 60	Time: 1124
Direction Photo Taken: In Lower Tunnel	
Photo Description: Skim valve (closest to tank).	



Photographer: WITUL	
Photo No. 61	Time: 1125
Direction Photo Taken: In Lower Tunnel	
Photo Description: Ball valves at Tank 16 piping.	

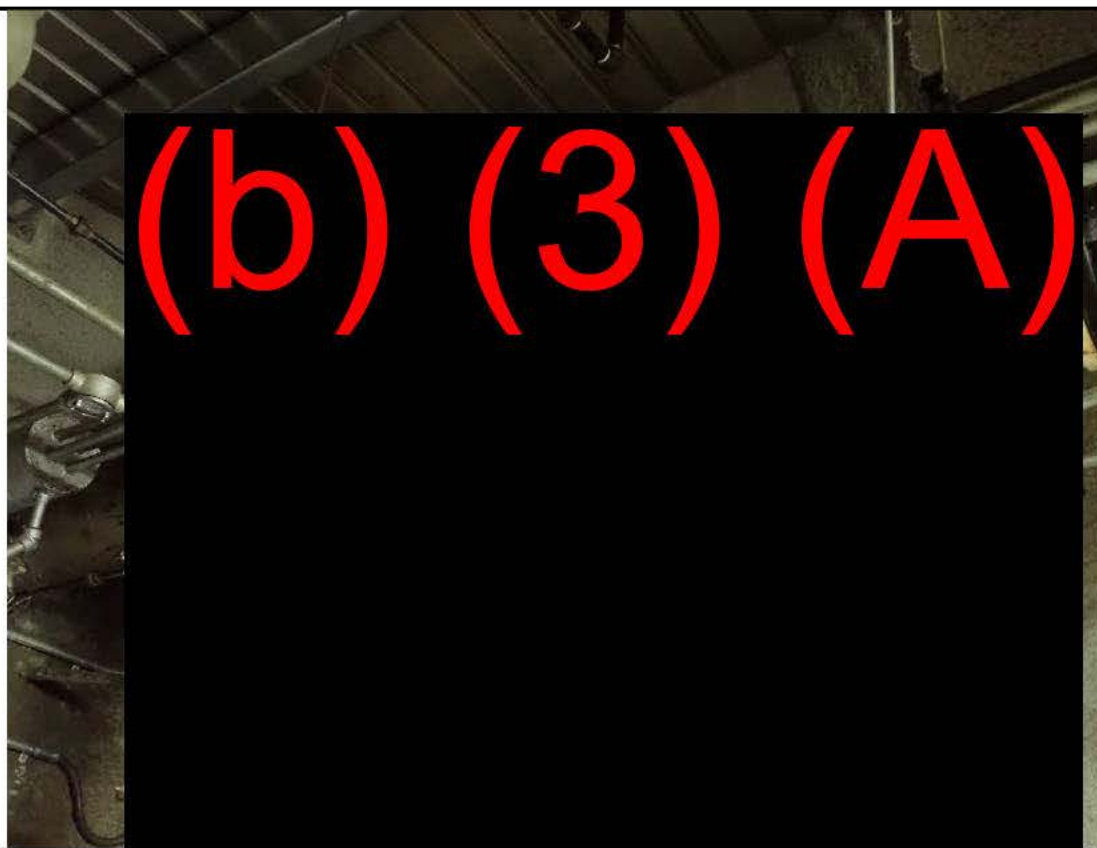
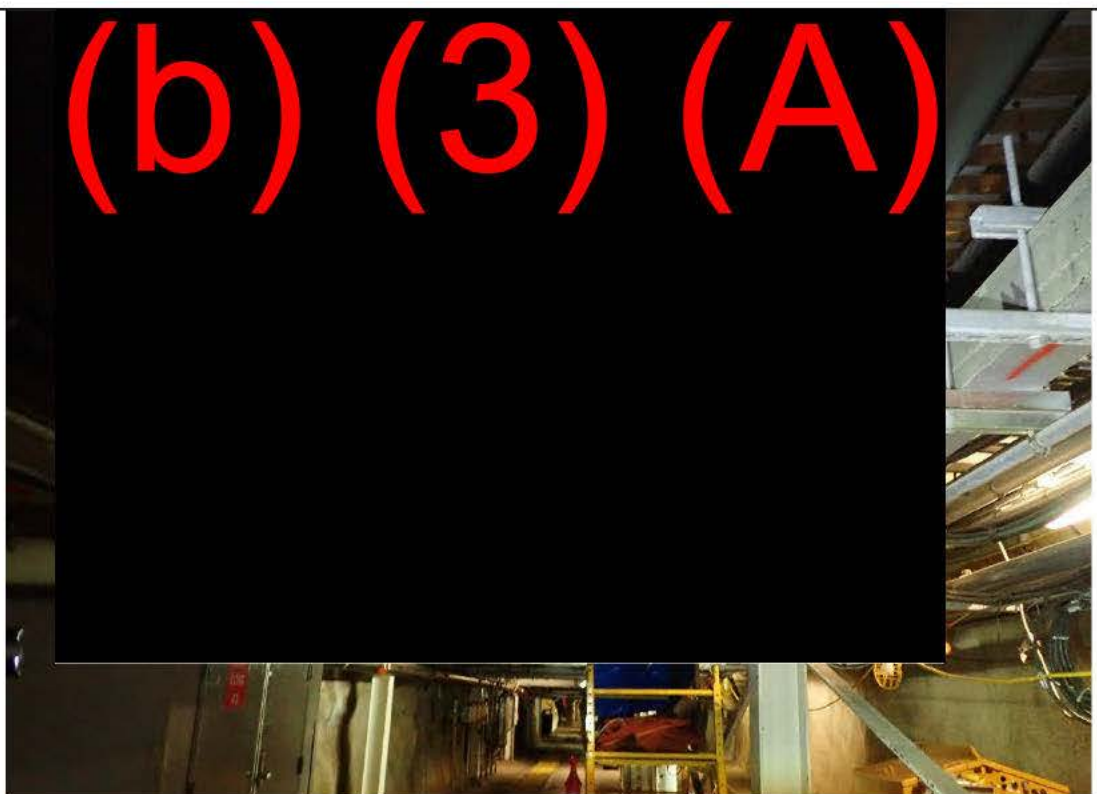


Photo No. 62	Time: 1129
Direction Photo Taken: In Lower Tunnel	
Photo Description: Overhead piping, just past Tank 15 and Tank 16.	



Photographer: WITUL	
Photo No. 63	Time: 1134
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sampling lines/ports & drain funnel.	

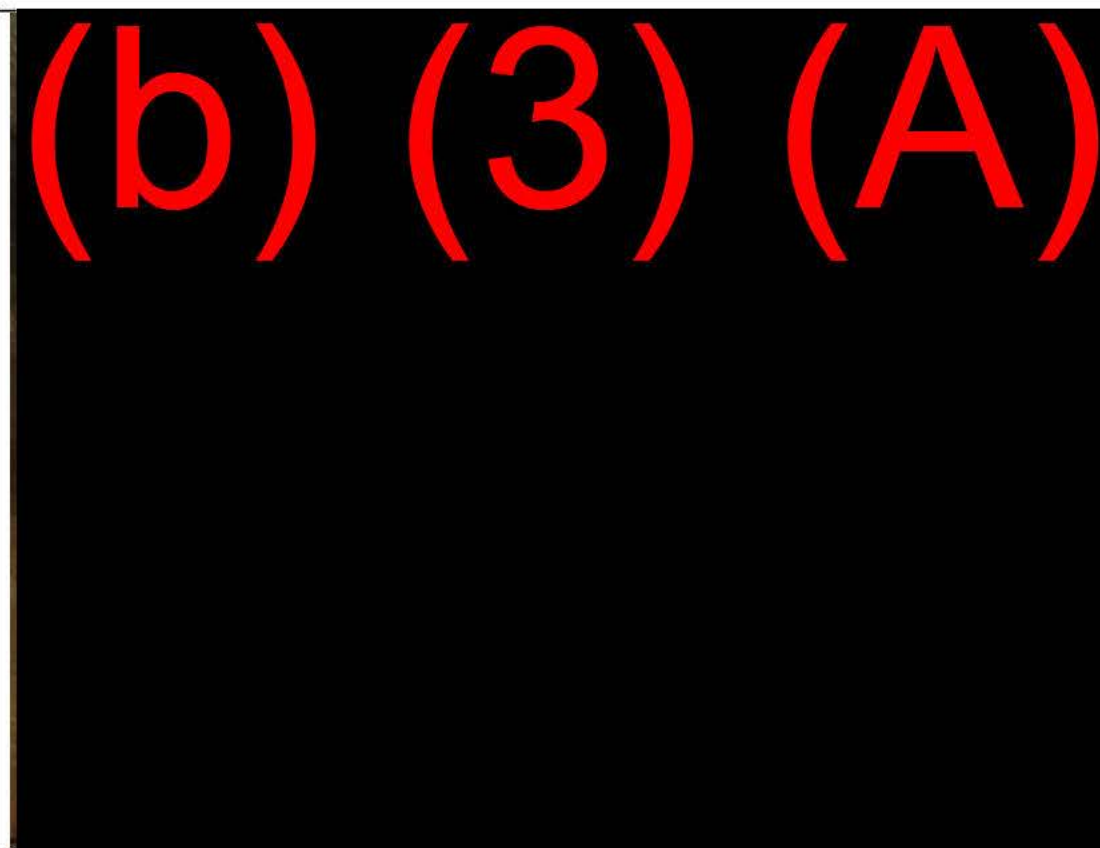
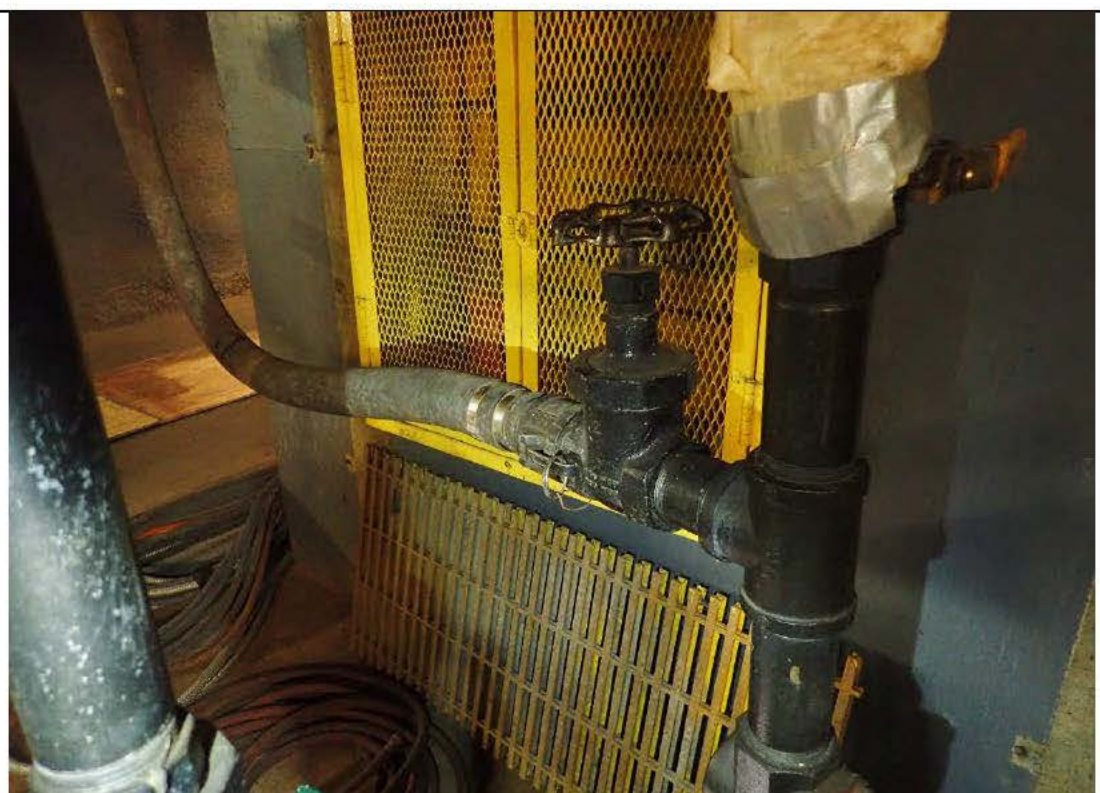


Photo No. 64	Time: 1138
Direction Photo Taken: In Lower Tunnel	
Photo Description: Flexible hose attached for draining to sump. Possible use is to alleviate vacuum bubbles in main transfer lines.	



Photographer: WITUL	
Photo No. 65	Time: 1141
Direction Photo Taken: In Lower Tunnel	
Photo Description: Wet sample line end, typical of several seen.	

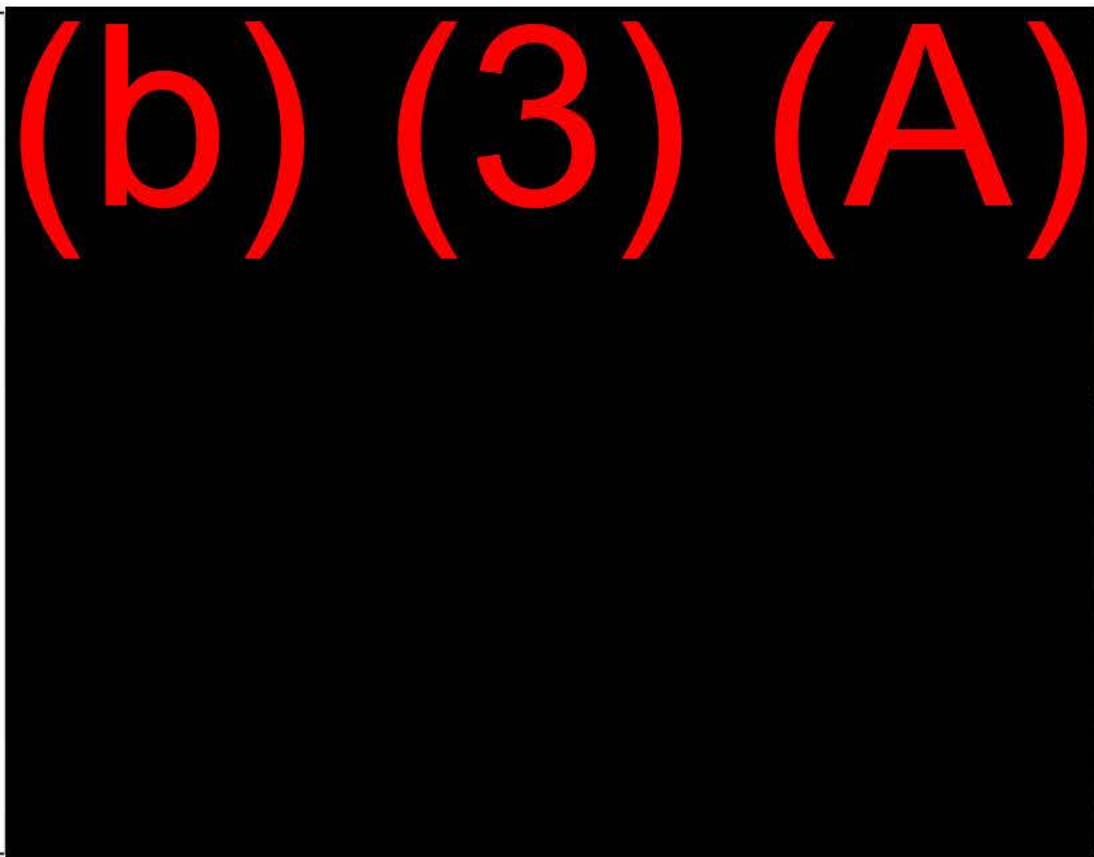
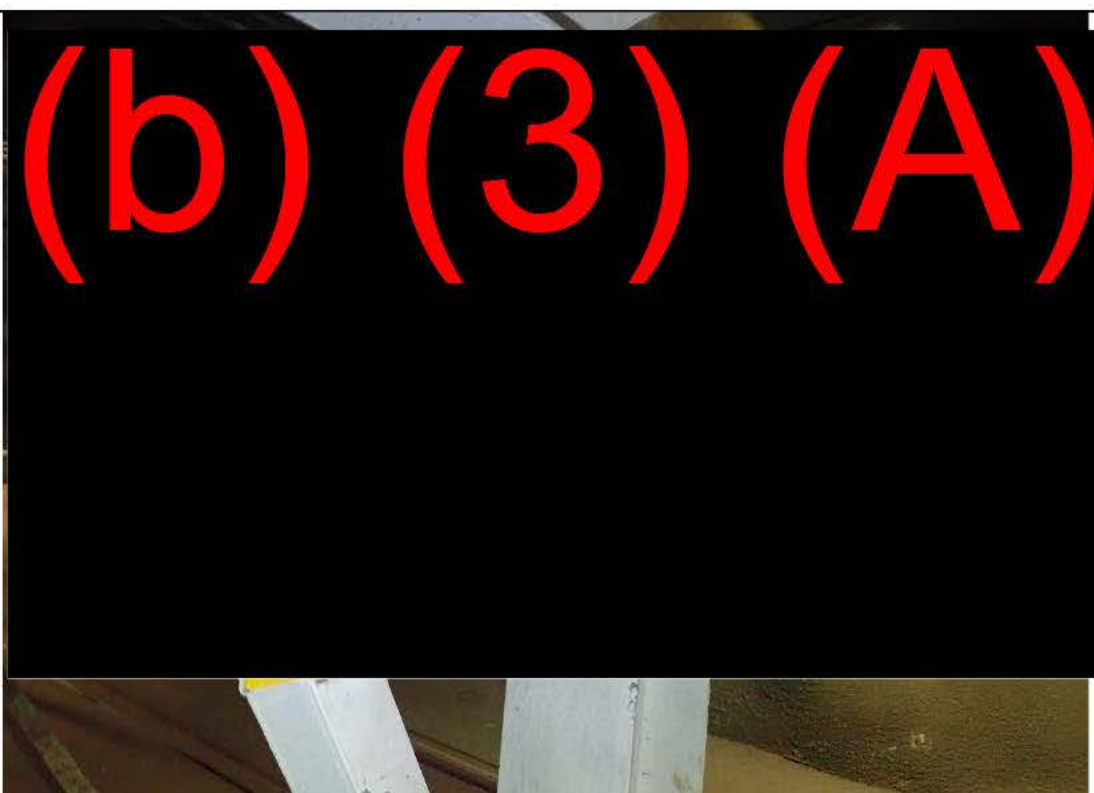


Photo No. 66	Time: 1144
Direction Photo Taken: In Lower Tunnel	
Photo Description: Mastic on pipe with irregularities.	



Photographer: WITUL	
Photo No. 67	Time: 1149
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 13 improved sample draw system with upgrades to top valves for isolation, and welded versus threaded fittings.	

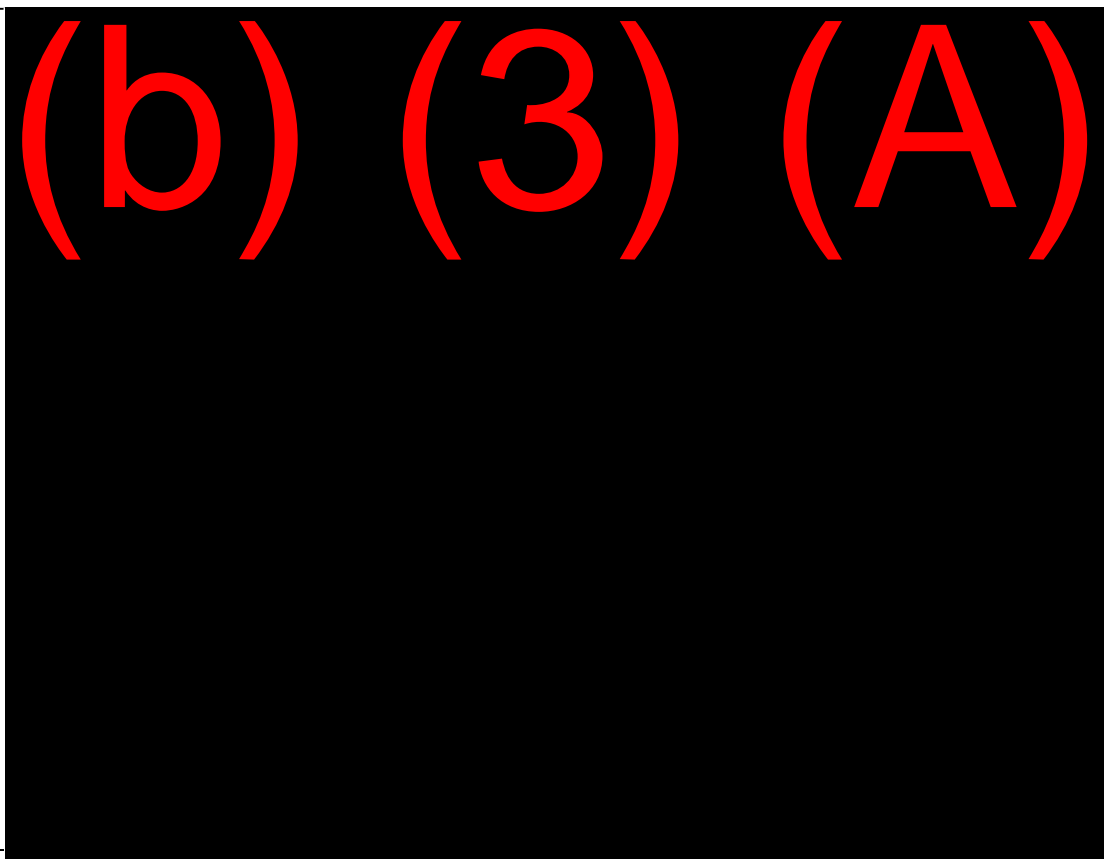
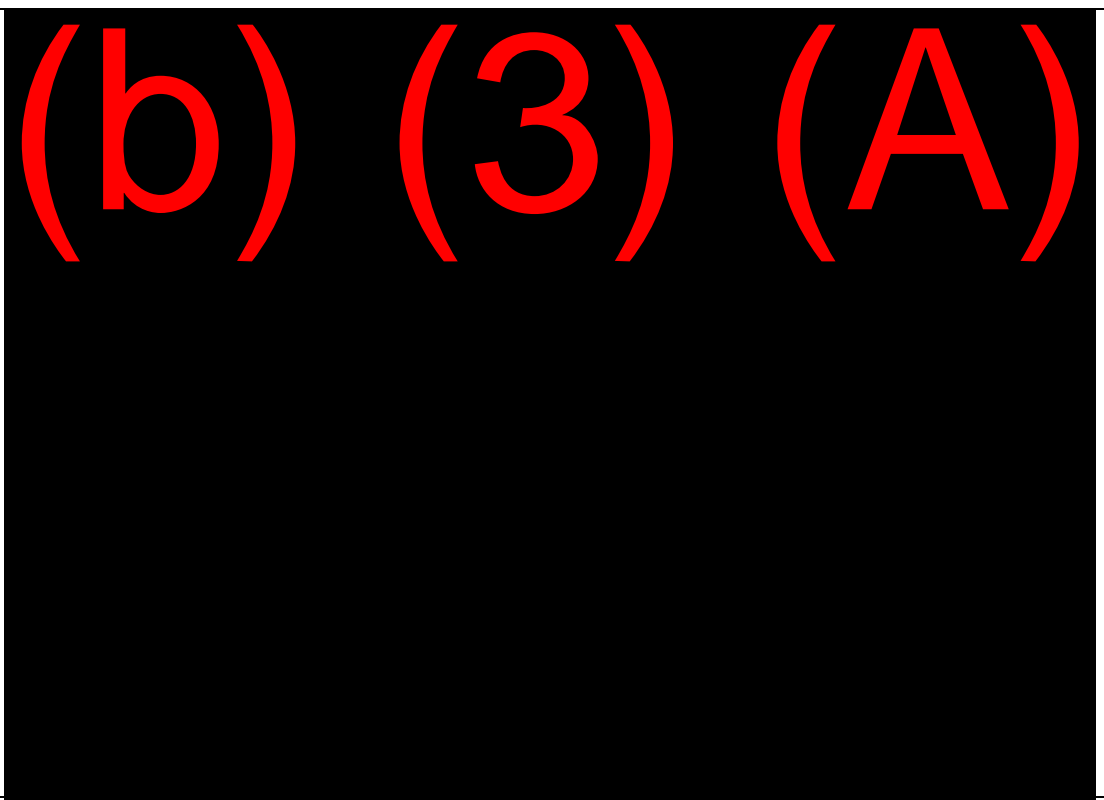


Photo No. 68	Time: 1151
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 13 lines blanked; still in clean, inspect, and repair cycle.	



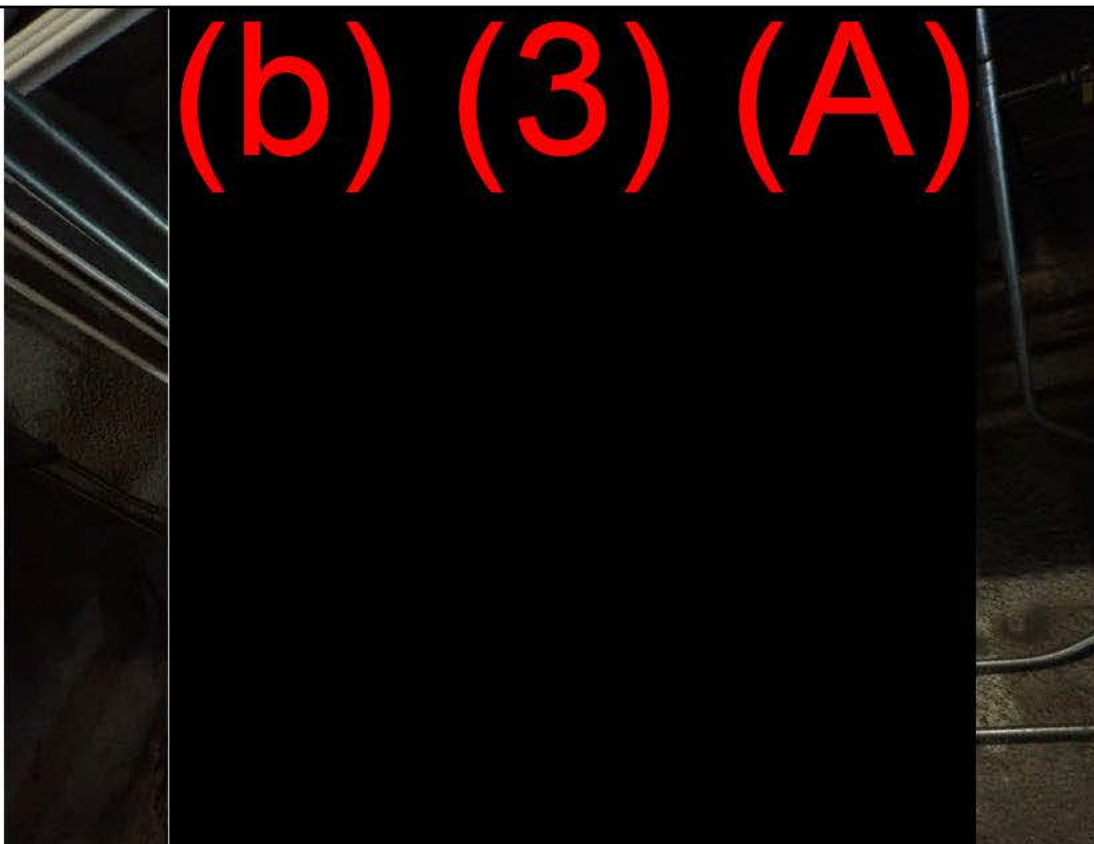
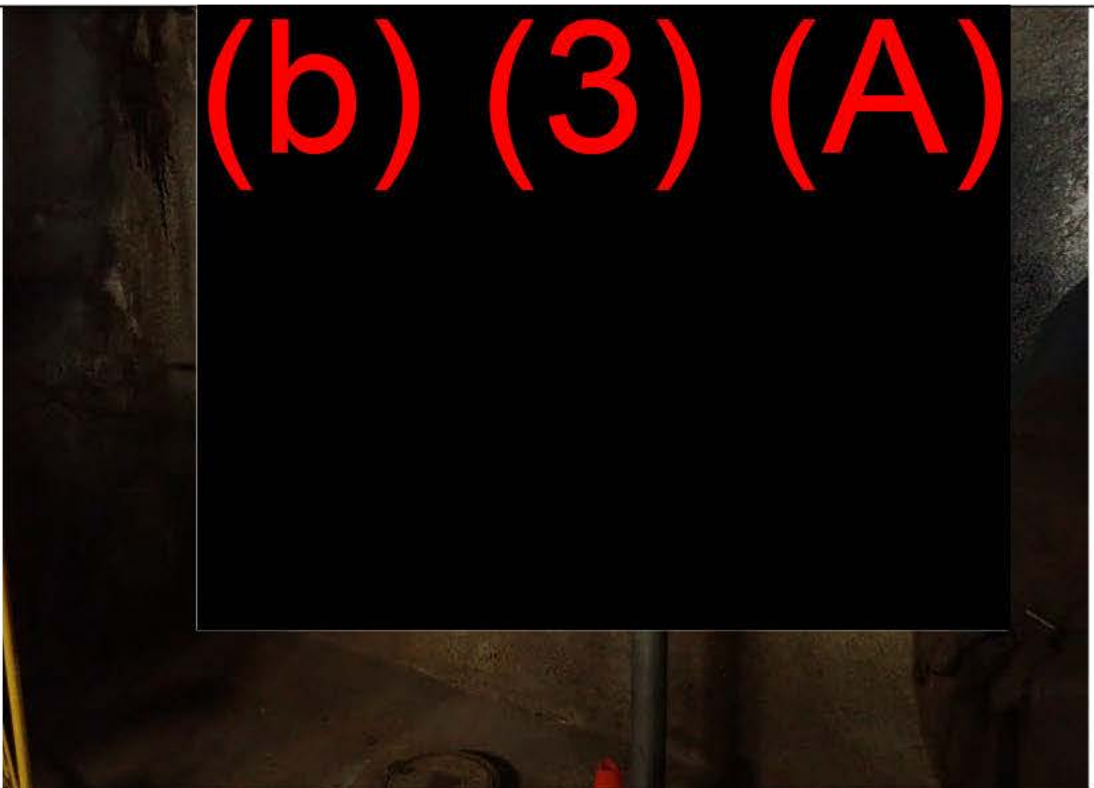
Photographer: WITUL		
Photo No. 69	Time: 1154	
Direction Photo Taken: In Lower Tunnel		
Photo Description: Newer valve system at Tank 13, upper portion.		

Photo No. 70	Time: 1154	
Direction Photo Taken: In Lower Tunnel		
Photo Description: Newer valve system at Tank 13, bottom portion.		

Photographer: WITUL	
Photo No. 71	Time: 1156
Direction Photo Taken: In Lower Tunnel	
Photo Description: Controls for Tank 13.	

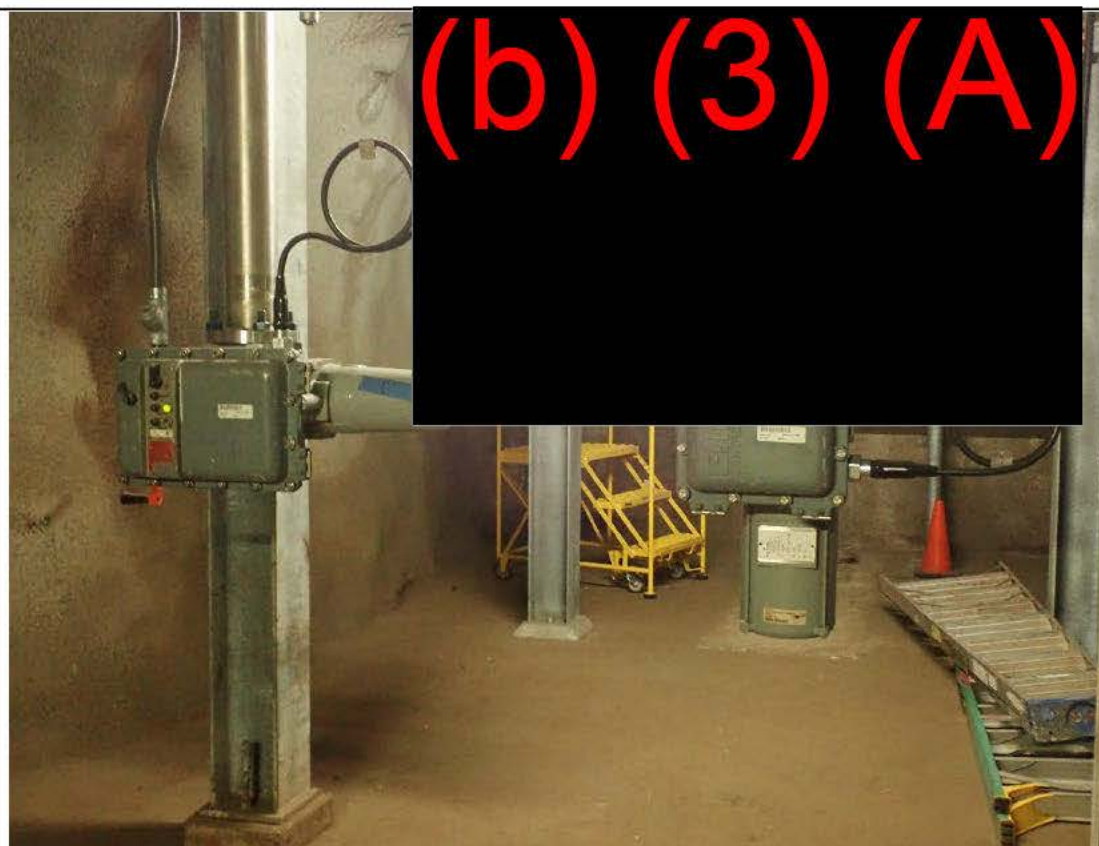


Photo No. 72	Time: 1159
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sump #2 under grating, near Tank 11.	



Photographer: WITUL	
Photo No. 73	Time: 1201
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 11, old 45-degree pipe run from tank (at center of image).	

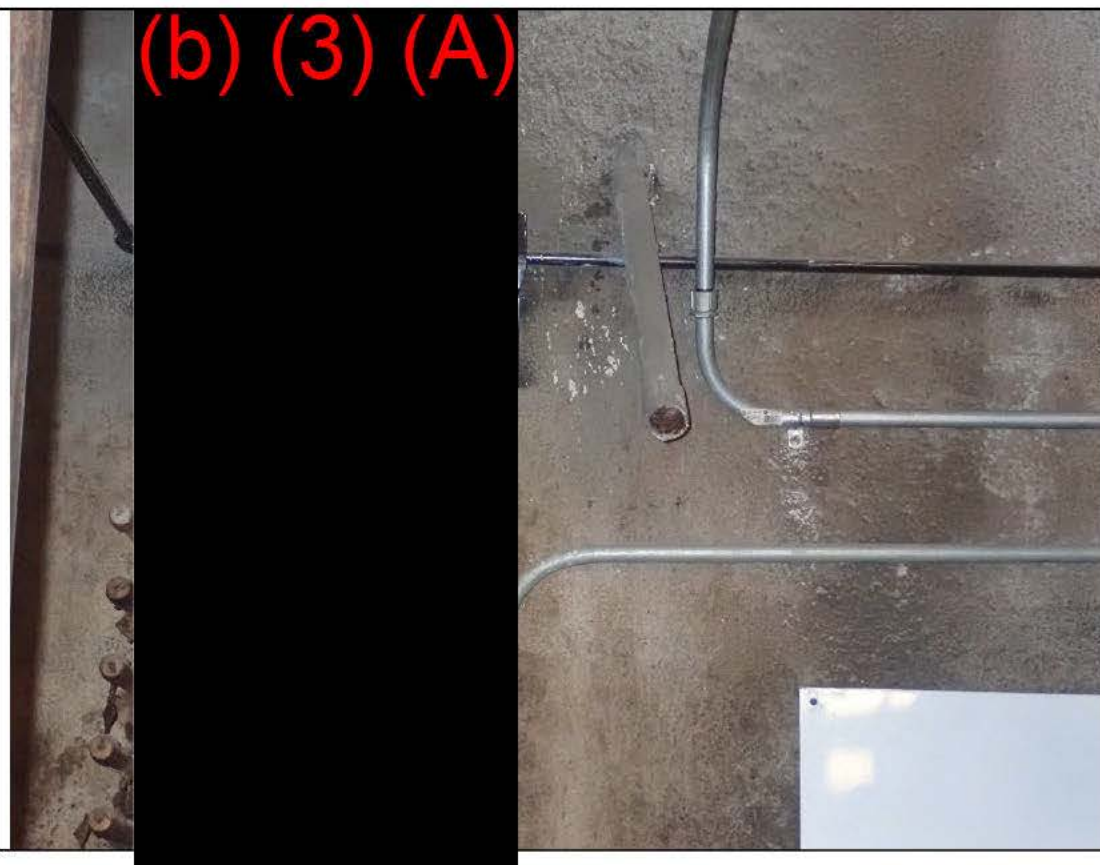
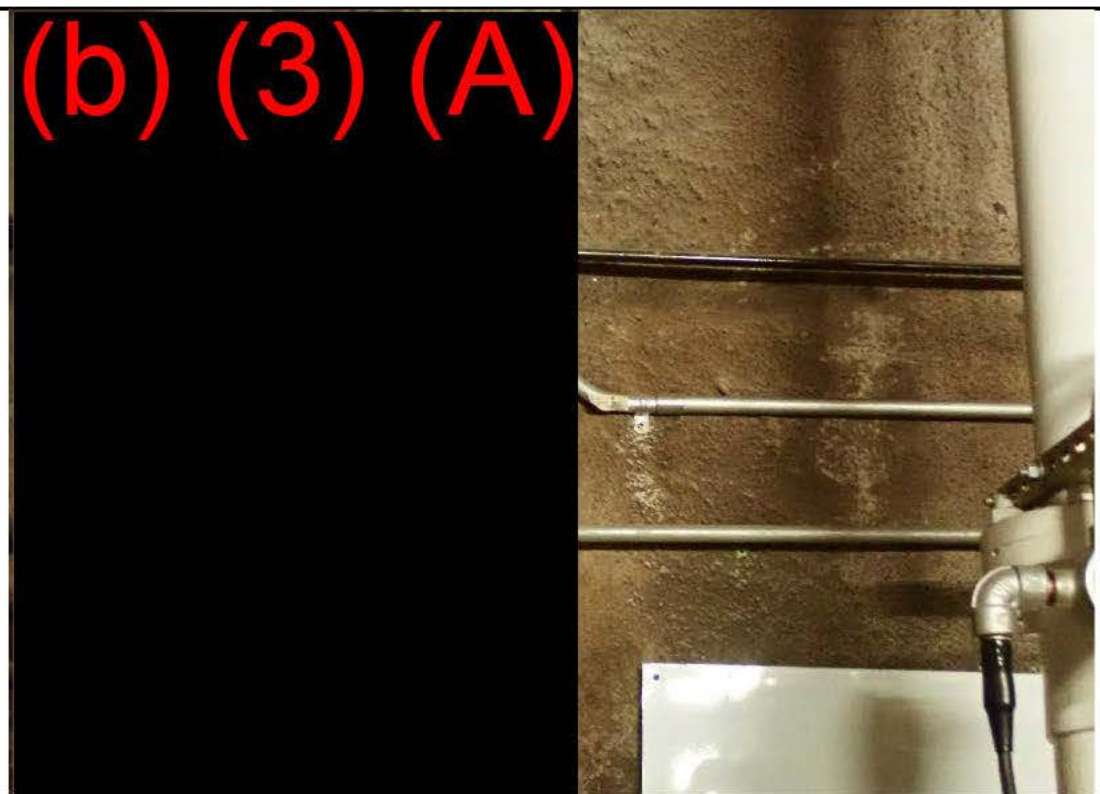


Photo No. 74	Time: 1201
Direction Photo Taken: In Lower Tunnel	
Photo Description: Old 45-degree pipe run from Tank 11, additional view.	



Photographer: WITUL	
Photo No. 75	Time: 1202
Direction Photo Taken: In Lower Tunnel	
Photo Description: Open pipe – former opening from Tank 11.	

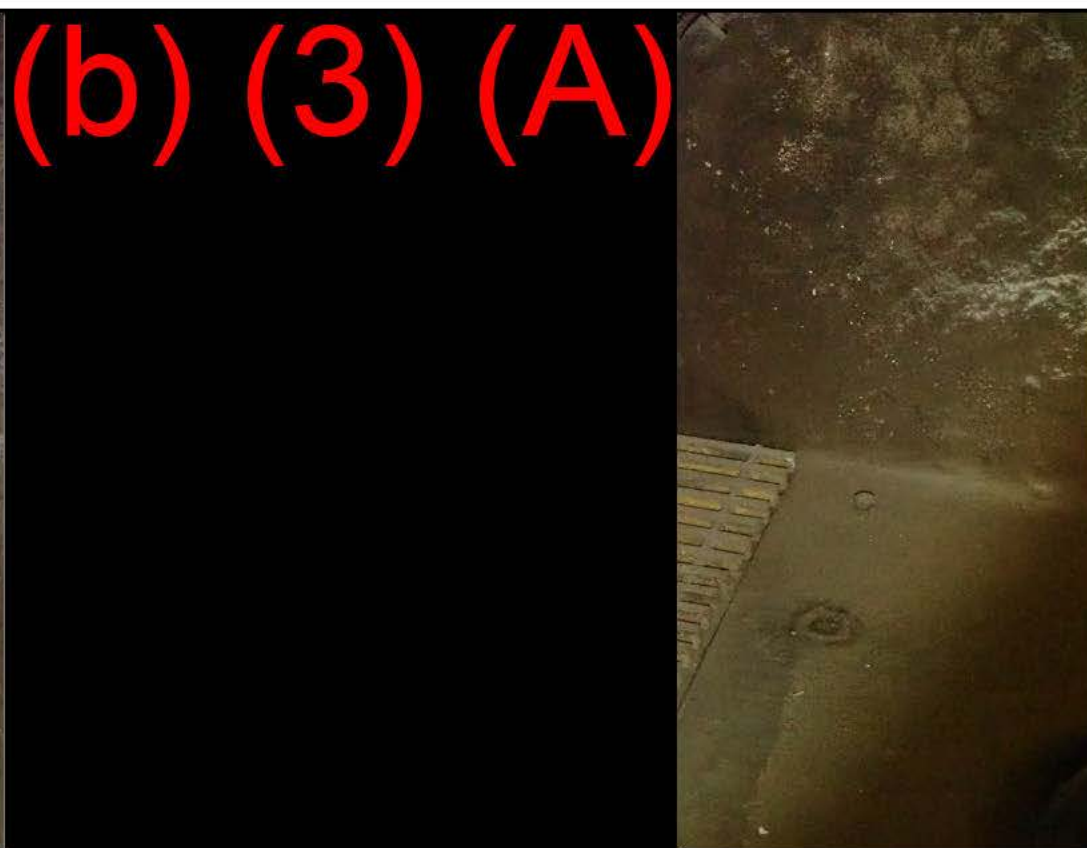
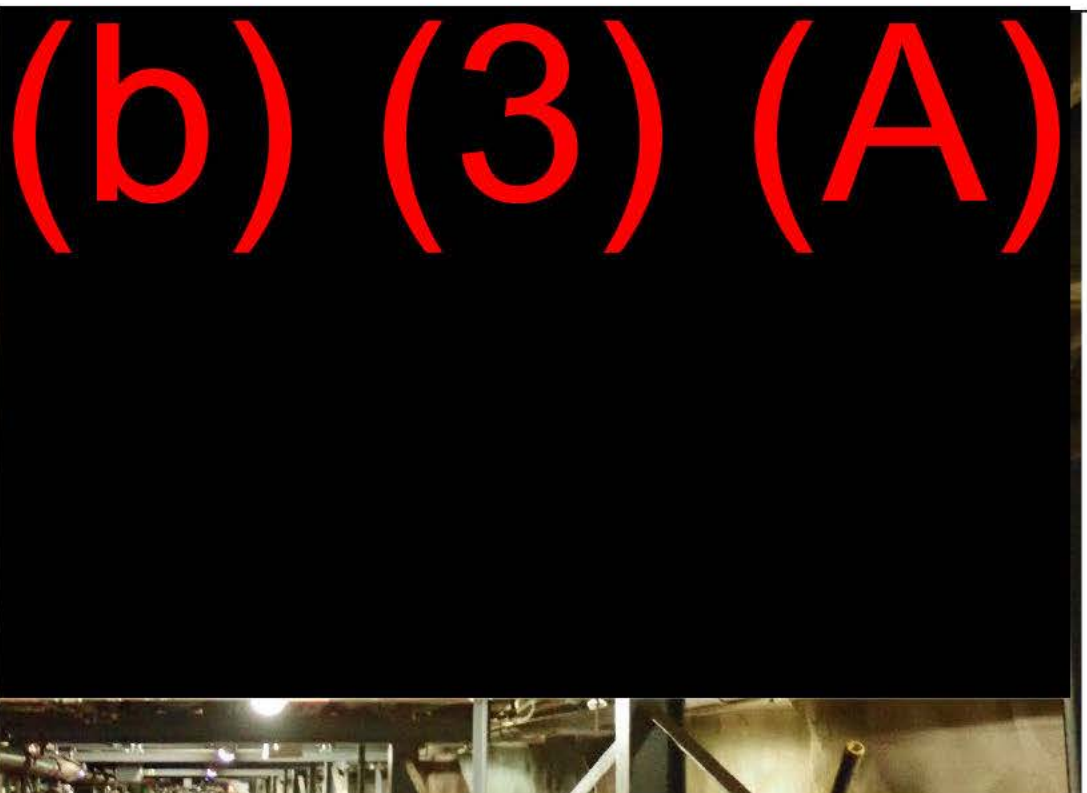


Photo No. 76	Time: 1203
Direction Photo Taken: In Lower Tunnel	
Photo Description: View of piping overhead.	



Photographer: WITUL	
Photo No. 77	Time: 1207
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sectional valve - dead side; above Tank 10 and Tank 9 area.	

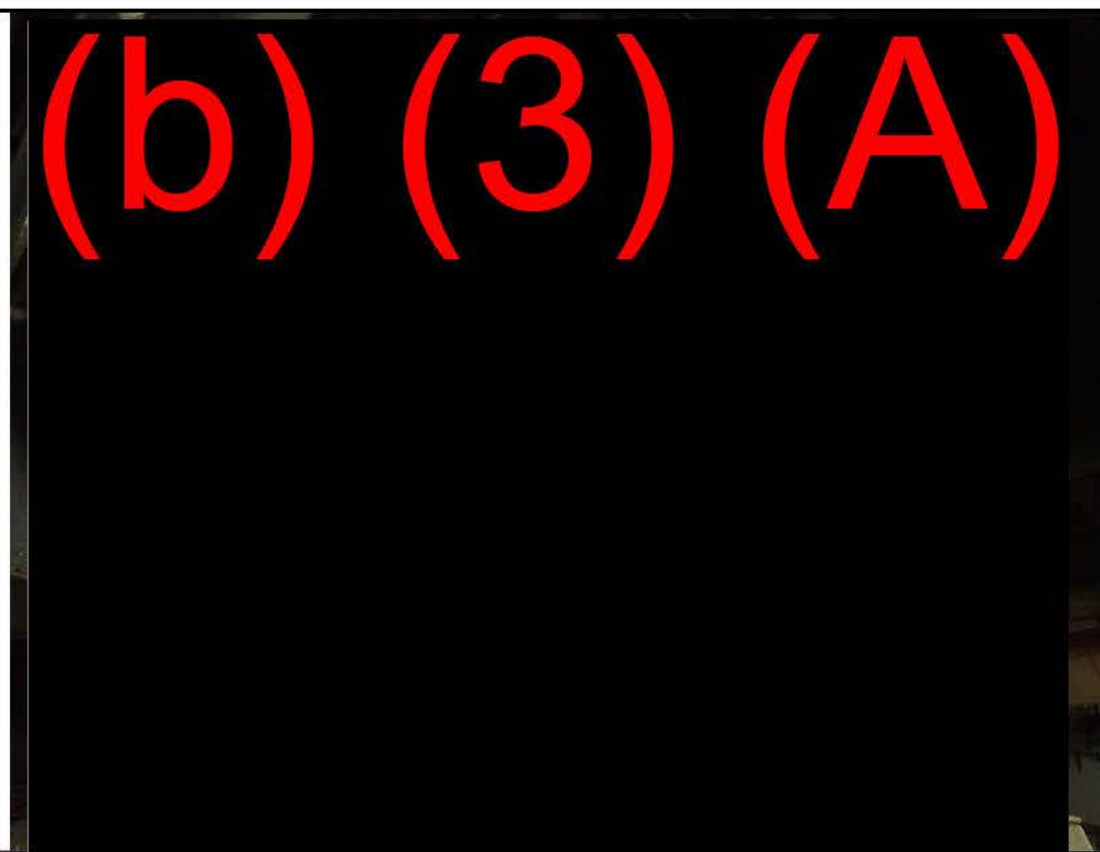
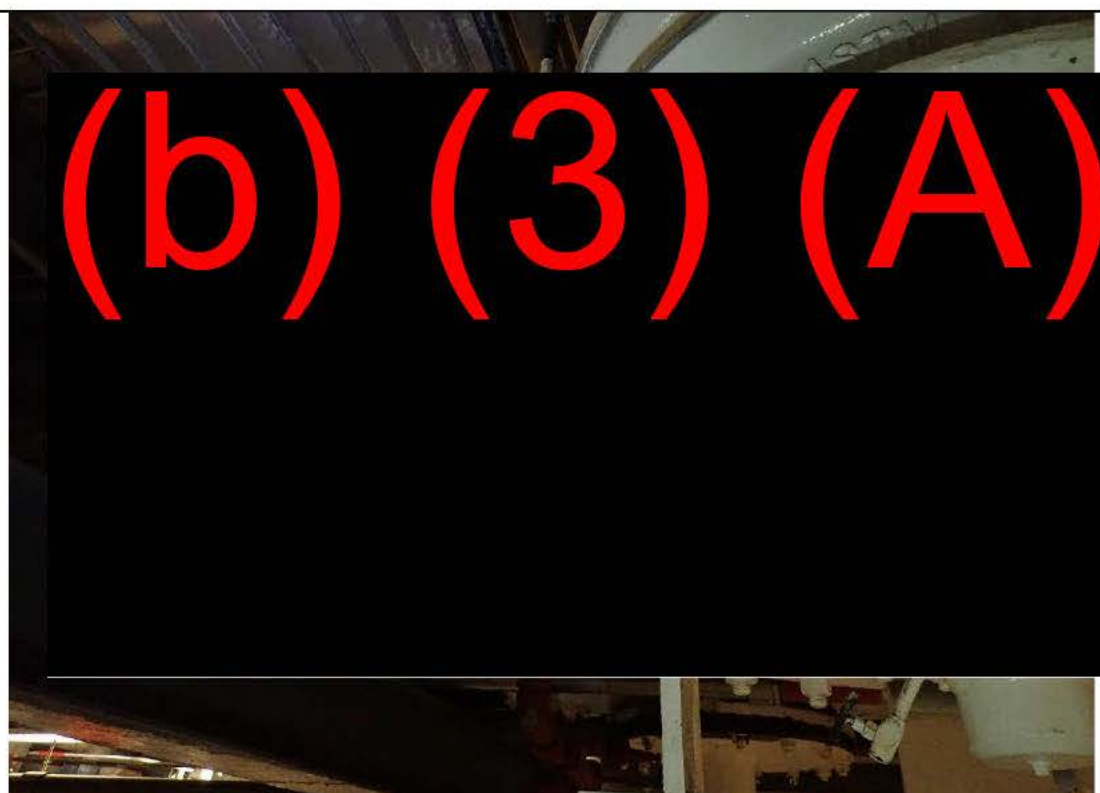


Photo No. 78	Time: 1207
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sectional valve; operational side.	



Photographer: WITUL	
Photo No. 79	Time: 1209
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 9 low point drain, slow dripping leak observed.	

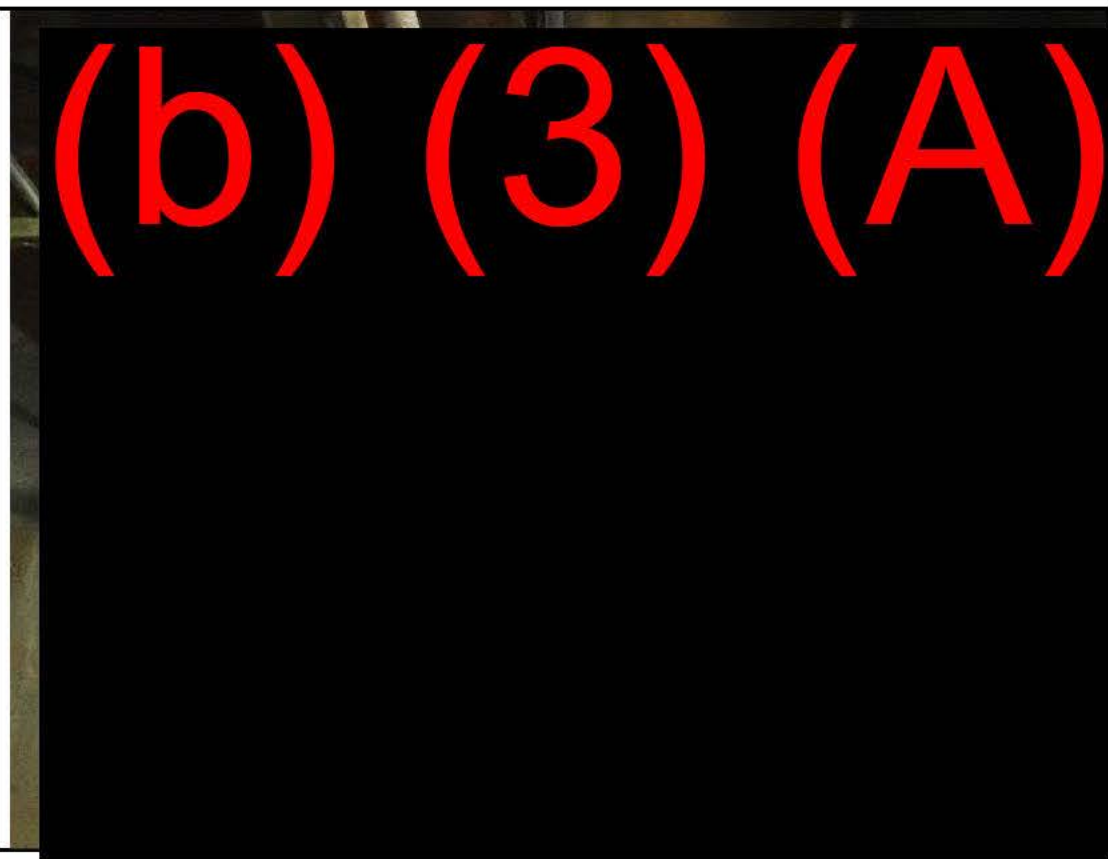
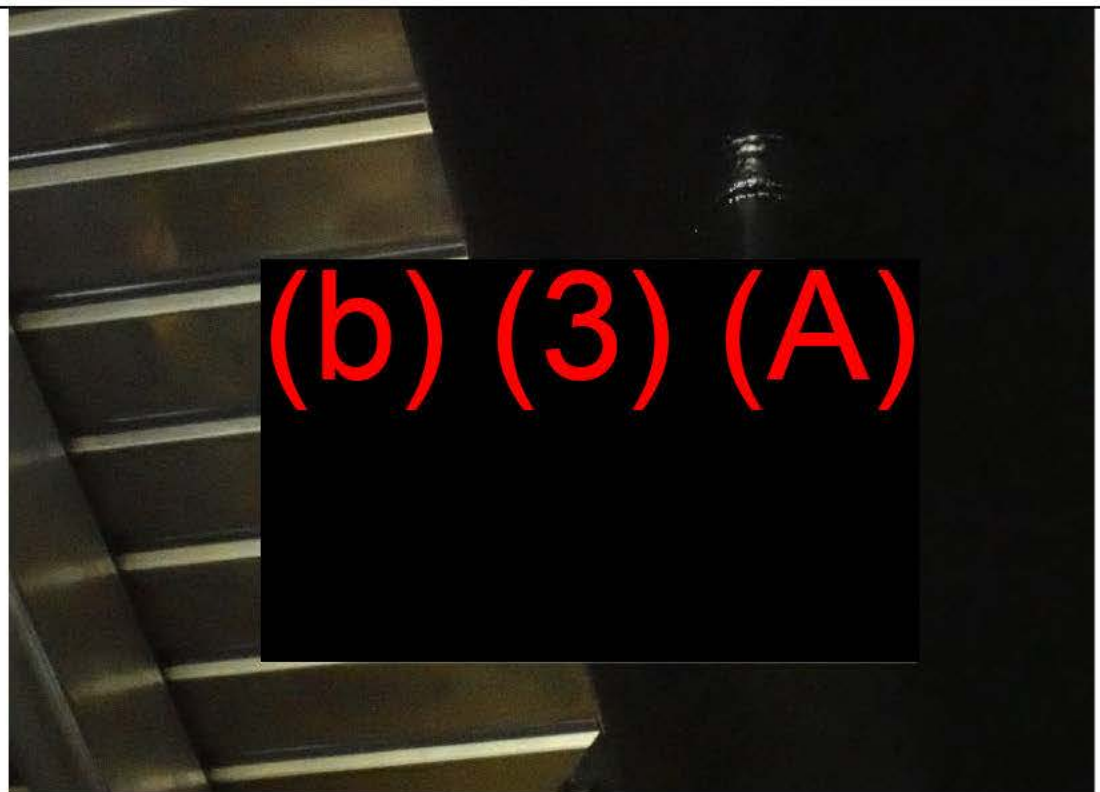


Photo No. 80	Time: 1210
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 9 low point drain, close-up.	



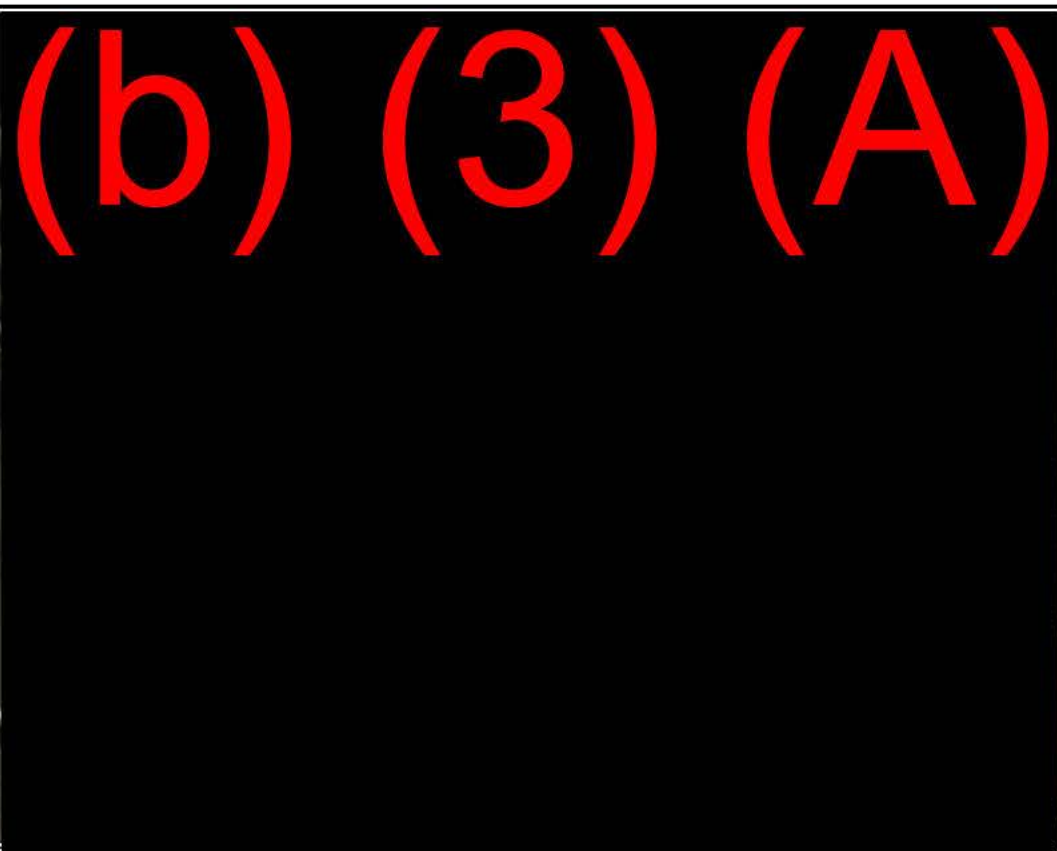
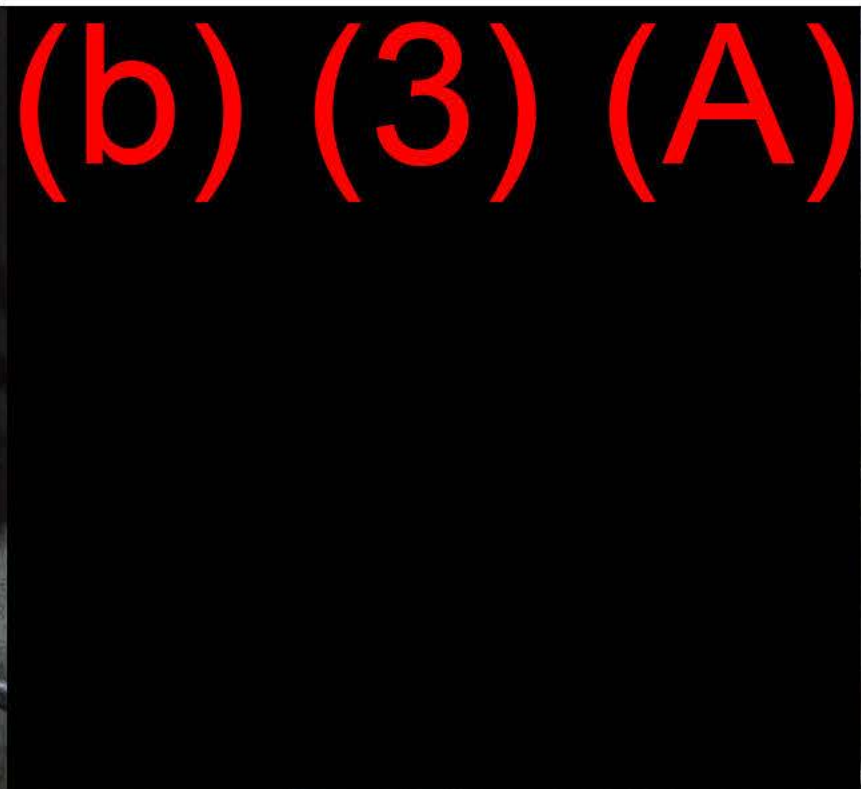

Photographer: WITUL		
Photo No. 81	Time: 1216	
Direction Photo Taken: In Lower Tunnel		
Photo Description: Tank 5, dual lines for dual fuel capability.		

Photo No. 82	Time: 1219	 
Direction Photo Taken: In Lower Tunnel		
Photo Description: Ball valve at Tank 6, with plug at end.		

Photographer: WITUL	
Photo No. 83	Time: 1221
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 6 fuel lines.	

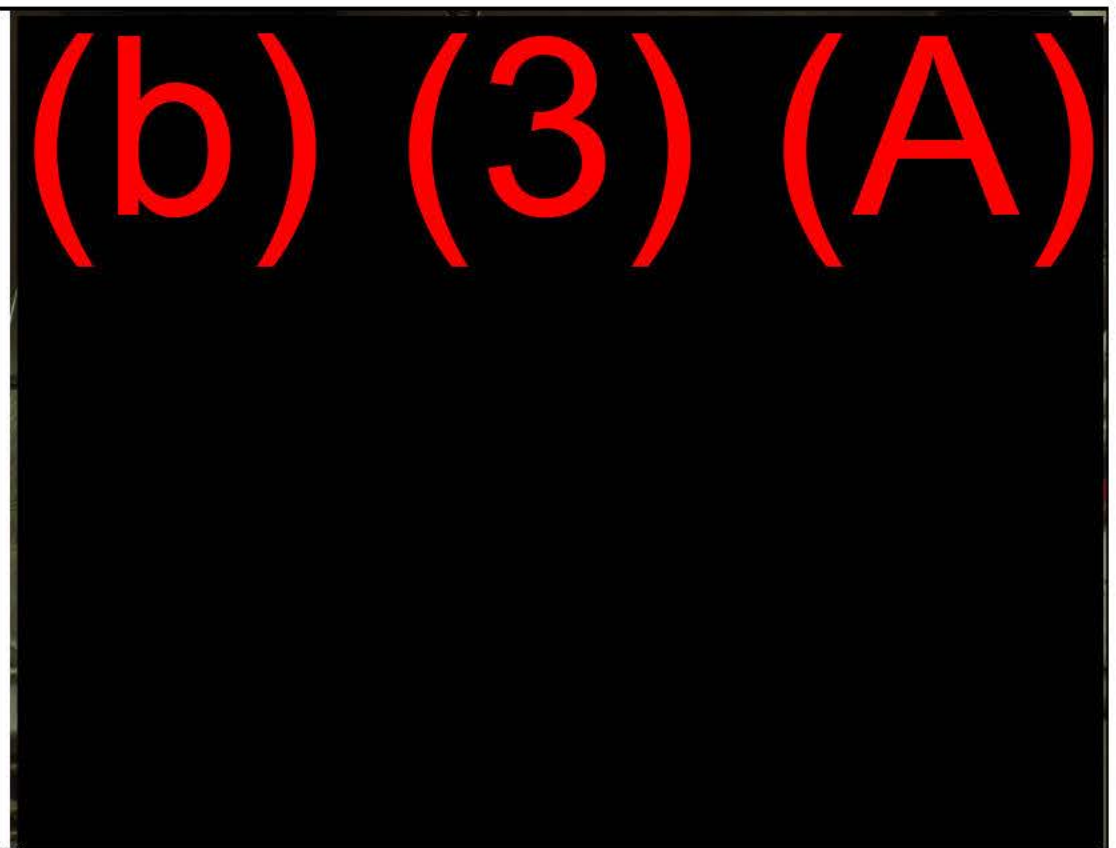


Photo No. 84	Time: 1223
Direction Photo Taken: In Lower Tunnel	
Photo Description: System sump controls.	



Photographer: WITUL	
Photo No. 85	Time: 1224
Direction Photo Taken: In Lower Tunnel	
Photo Description: Sump pump 5 lighted green.	

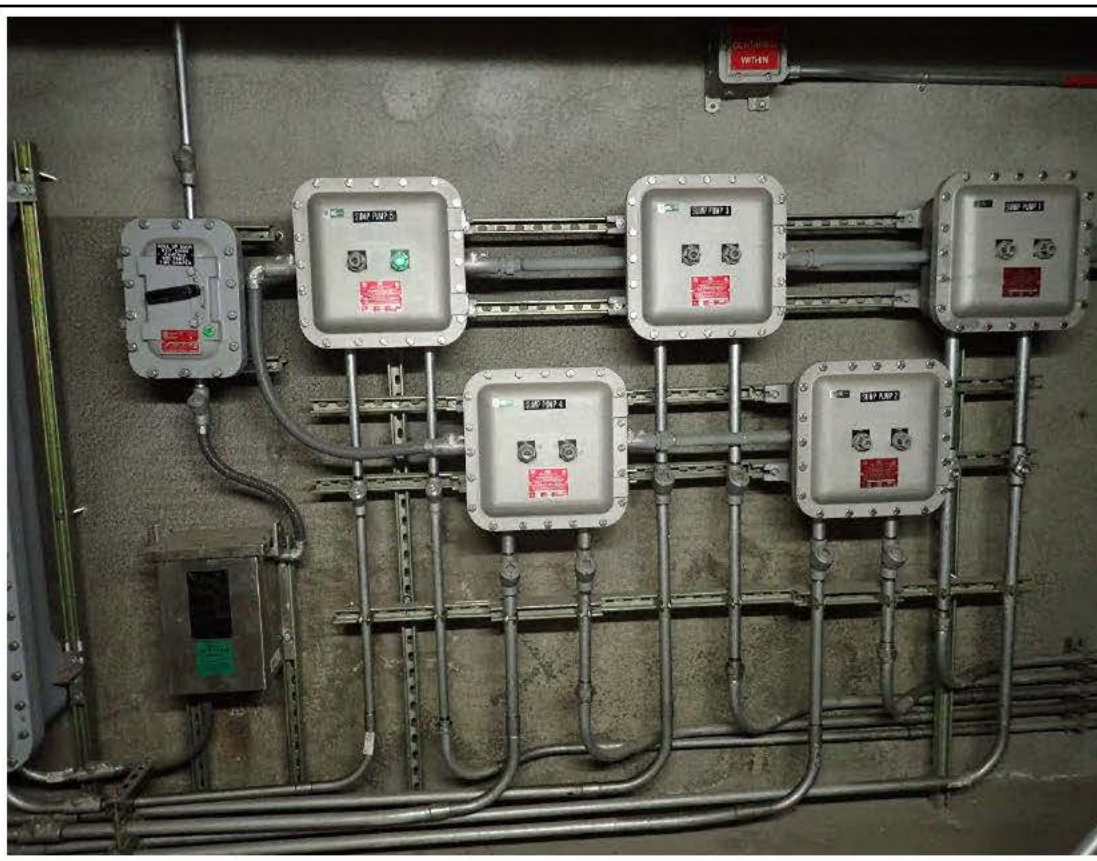
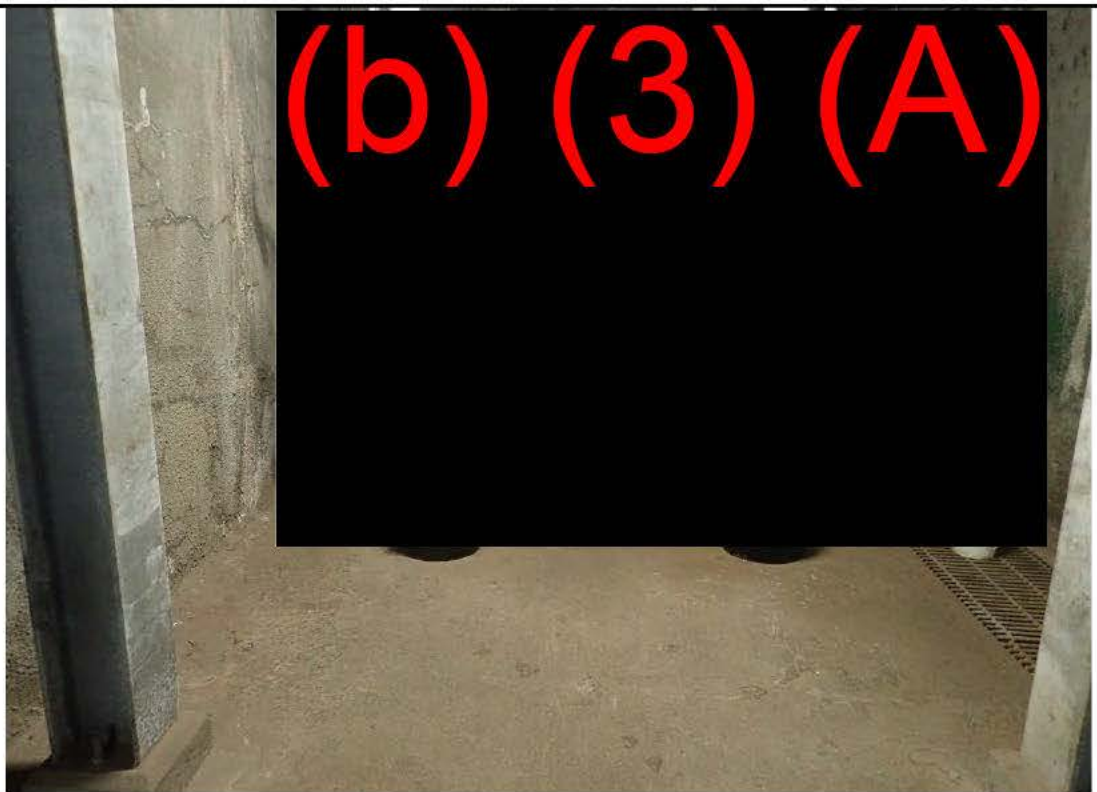
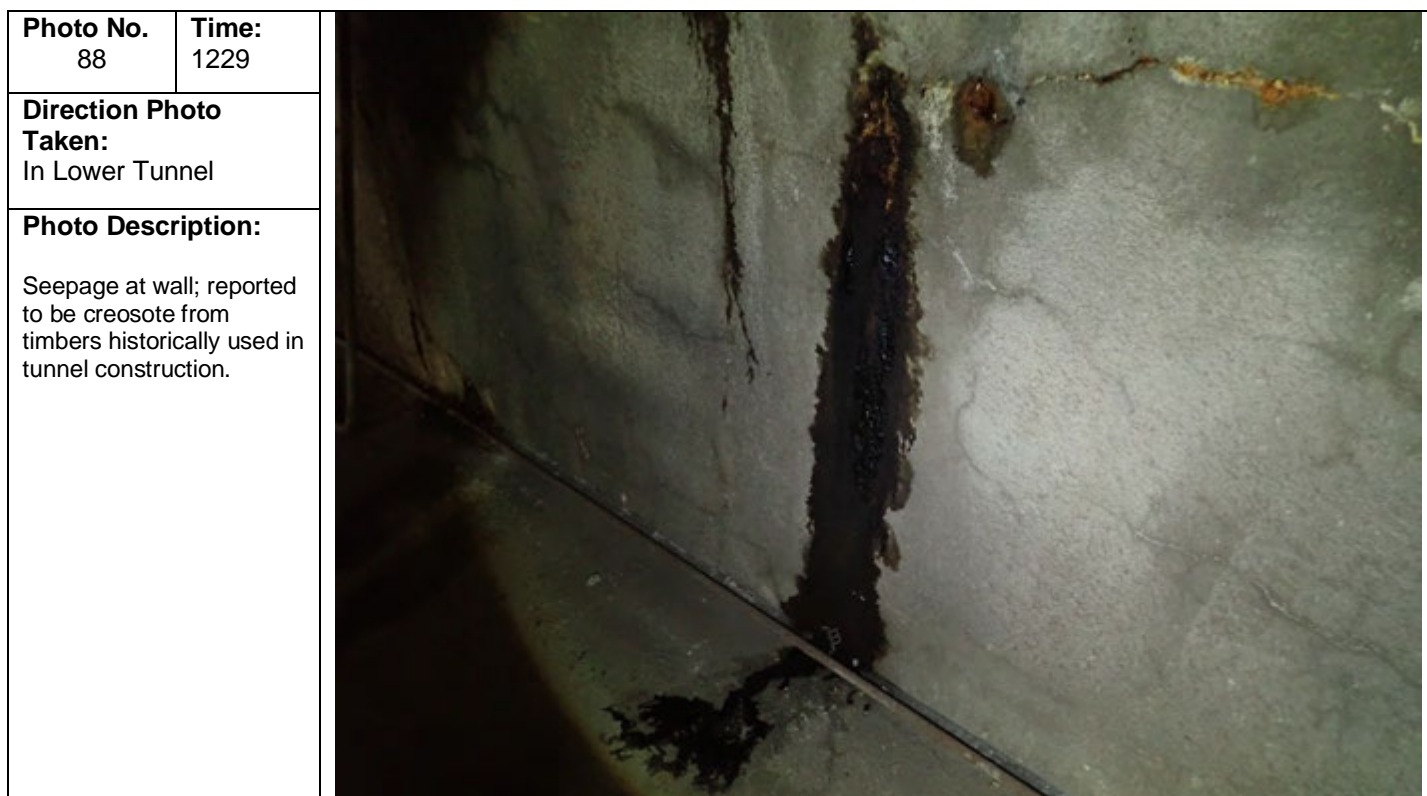
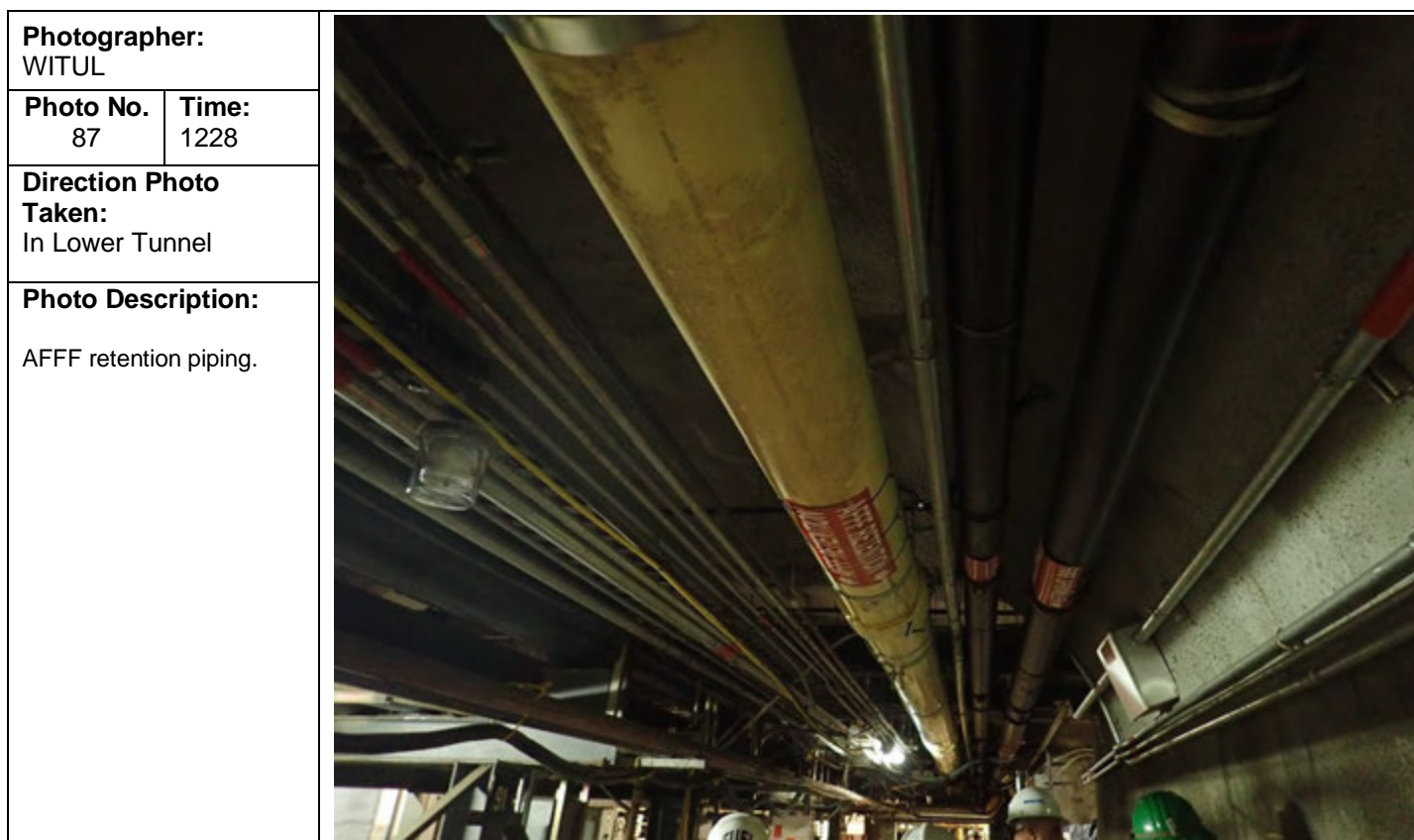


Photo No. 86	Time: 1226
Direction Photo Taken: In Lower Tunnel	
Photo Description: Tank 3, larger F76 piping tagged out-of-service. Pans placed below controls to contain possible drips.	

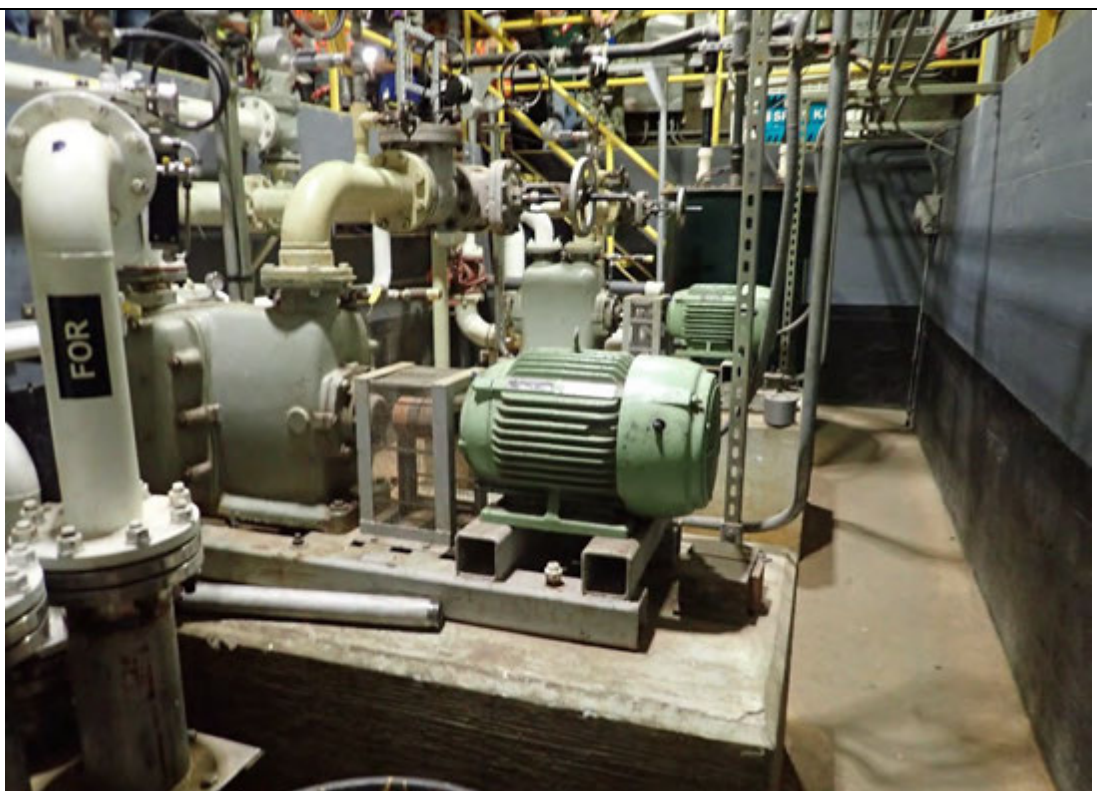




Photographer: WITUL	
Photo No. 89	Time: 1231
Direction Photo Taken: In Lower Tunnel	
Photo Description: Main sump tank, looking down and across.	



Photo No. 90	Time: 1232
Direction Photo Taken: In Lower Tunnel	
Photo Description: Main sump, pumps and piping.	



Photographer: WITUL	
Photo No. 91	Time: 1232
Direction Photo Taken: In Lower Tunnel	
Photo Description: 5000-gallon sump (or tank) pumps out to Fuel Oil Recovery Tank 311.	



Photo No. 92	Time: 1236
Direction Photo Taken: In Lower Tunnel	
Photo Description: Main sump tank, view from above.	



Photographer: WITUL	
Photo No. 93	Time: 1238
Direction Photo Taken: In Lower Tunnel	
Photo Description: Automated oil tight door sump #1099.	

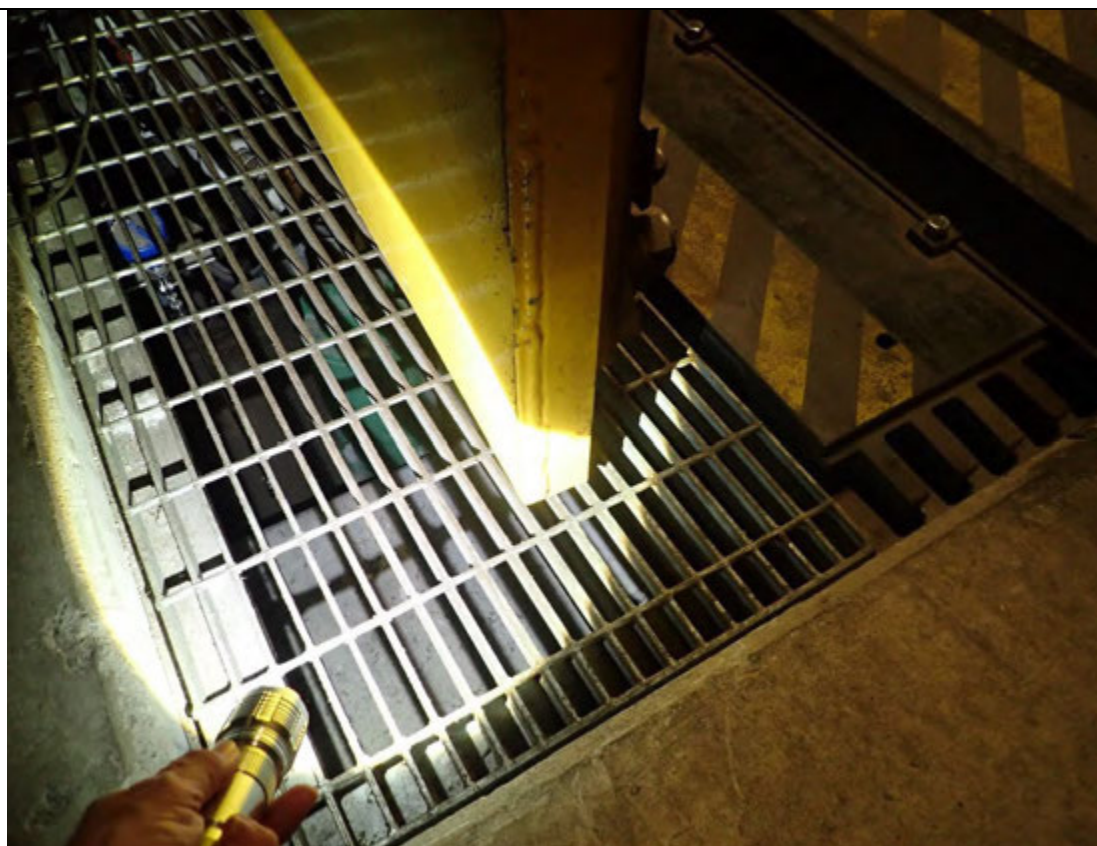


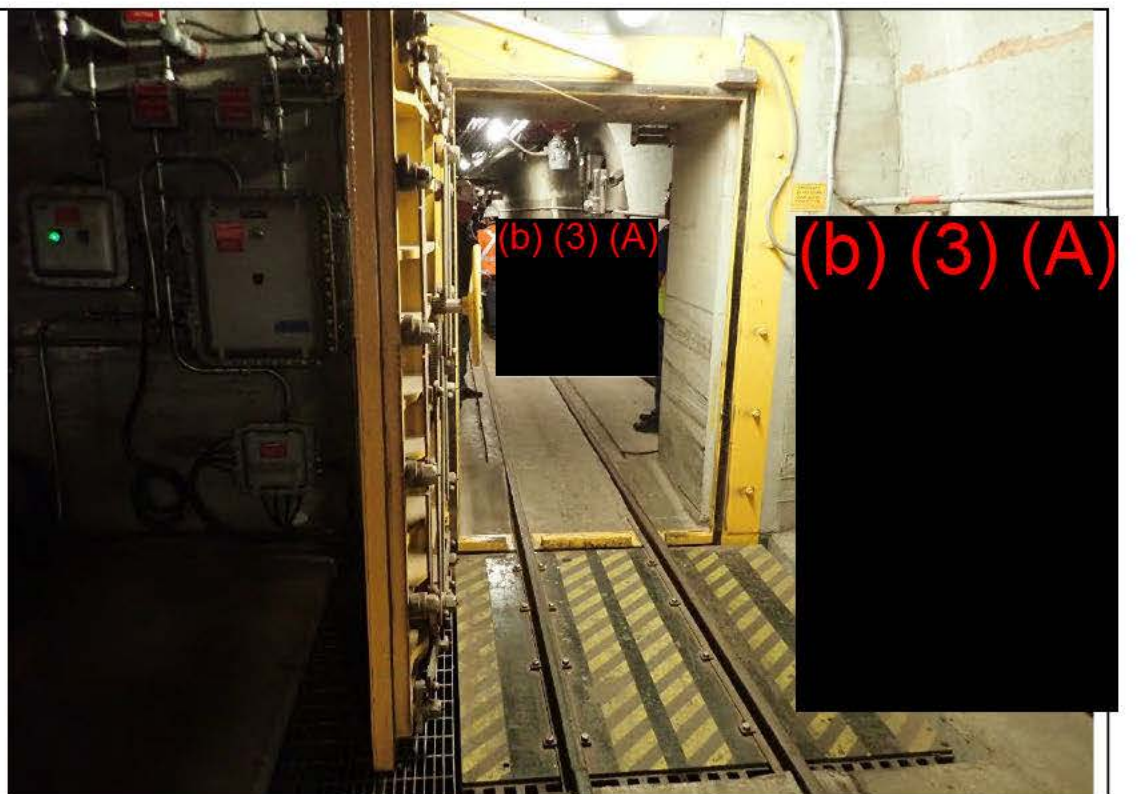
Photo No. 94	Time: 1238
Direction Photo Taken: In Lower Tunnel	
Photo Description: Grate lowers approximately 6 inches for closing door.	



Photographer: WITUL	
Photo No. 95	Time: 1238
Direction Photo Taken: In Lower Tunnel	
Photo Description: Door view; from tank side.	



Photo No. 96	Time: 1239
Direction Photo Taken: In Lower Tunnel	
Photo Description: Entrance to piping tunnel, and out to Adit entrance.	



Photographer: WITUL	
Photo No. 97	Time: 1242
Direction Photo Taken: In Lower Tunnel	
Photo Description: Piping in tunnel, including AFFF retention line and fuel oil recovery line.	

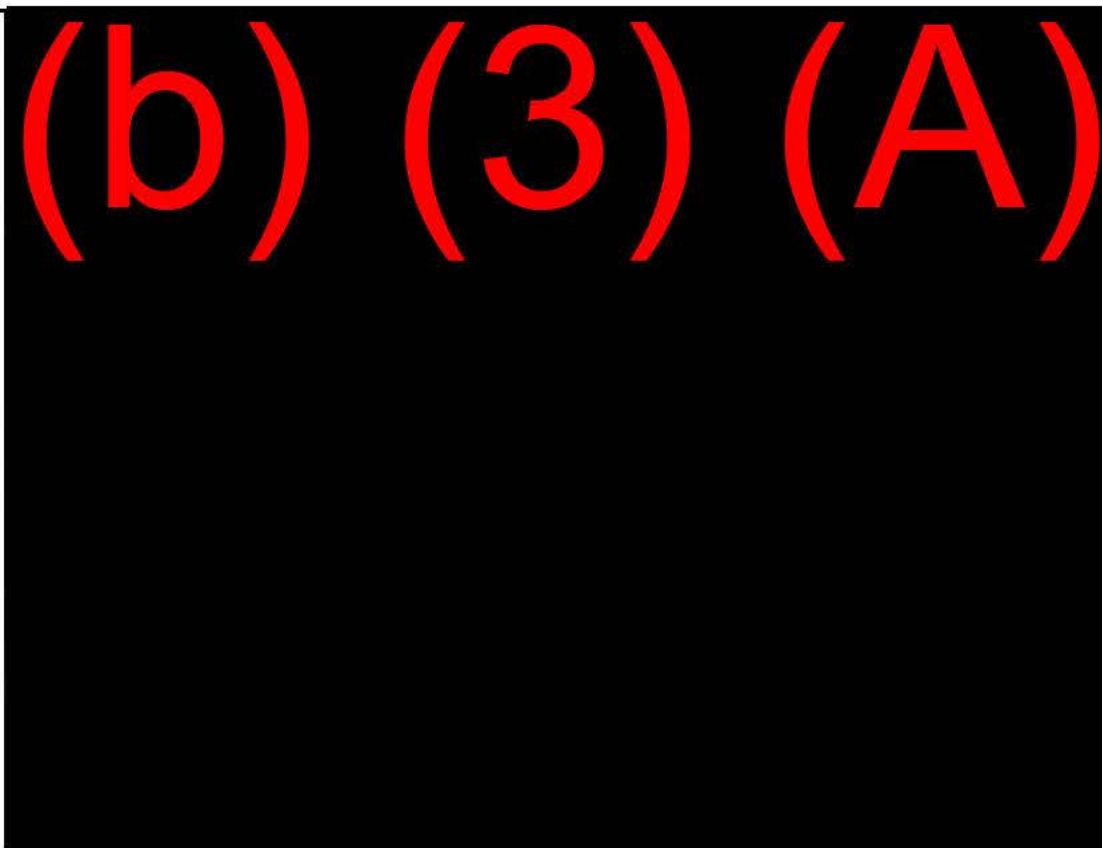
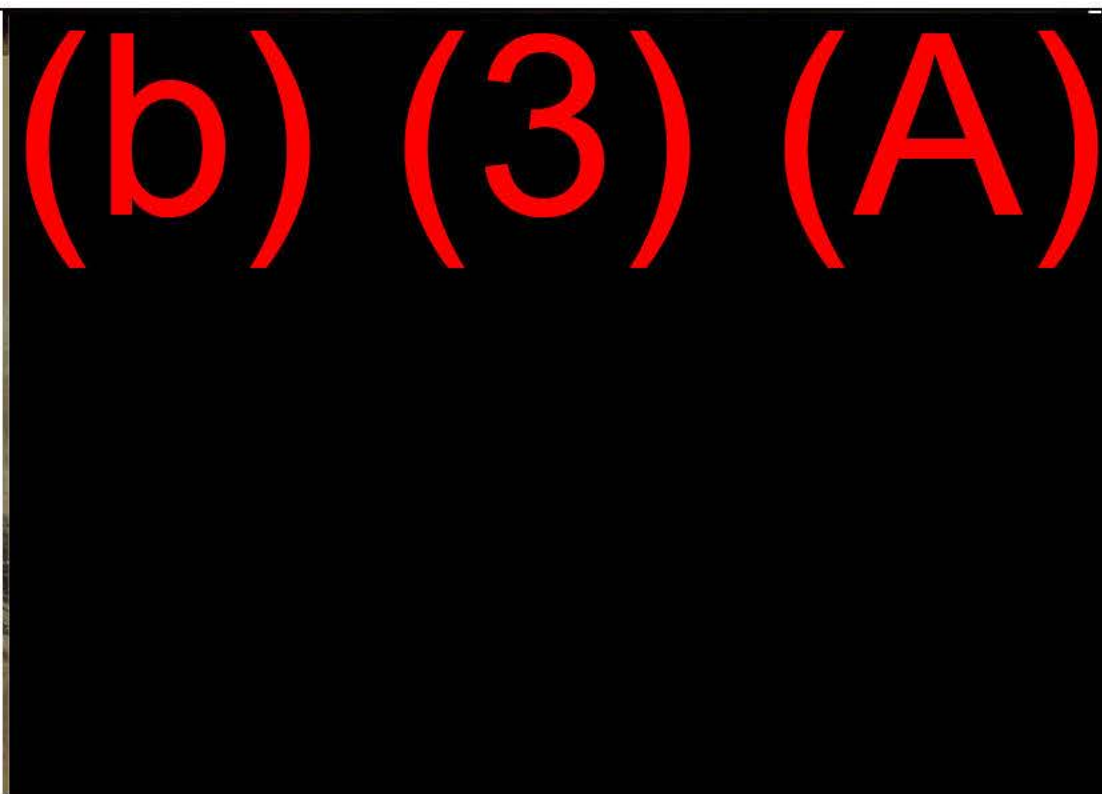


Photo No. 98	Time: 1248
Direction Photo Taken: In Lower Tunnel	
Photo Description: Flaking-off of pipe coating.	



Photographer: WITUL	
Photo No. 99	Time: 1249
Direction Photo Taken: In Lower Tunnel	
Photo Description: Pipe covering detail; irregularities do not necessarily indicate issue with piping underneath. .	

(b) (3) (A)

Photo No. 100	Time: 1253
Direction Photo Taken: In Lower Tunnel	
Photo Description: Location of November 20, 2021 break. PVC vertical section at bottom of pipe was knocked off by vehicle. Windy conditions in the area contributed to spread of fuel.	



Photographer: WITUL	
Photo No. 101	Time: 1255
Direction Photo Taken: In Lower Tunnel	
Photo Description: Fuel piping continues to Underground Pump House via tunnel to left. AFFF retention line and fuel oil recovery line continue to Adit 3 via tunnel to right.	

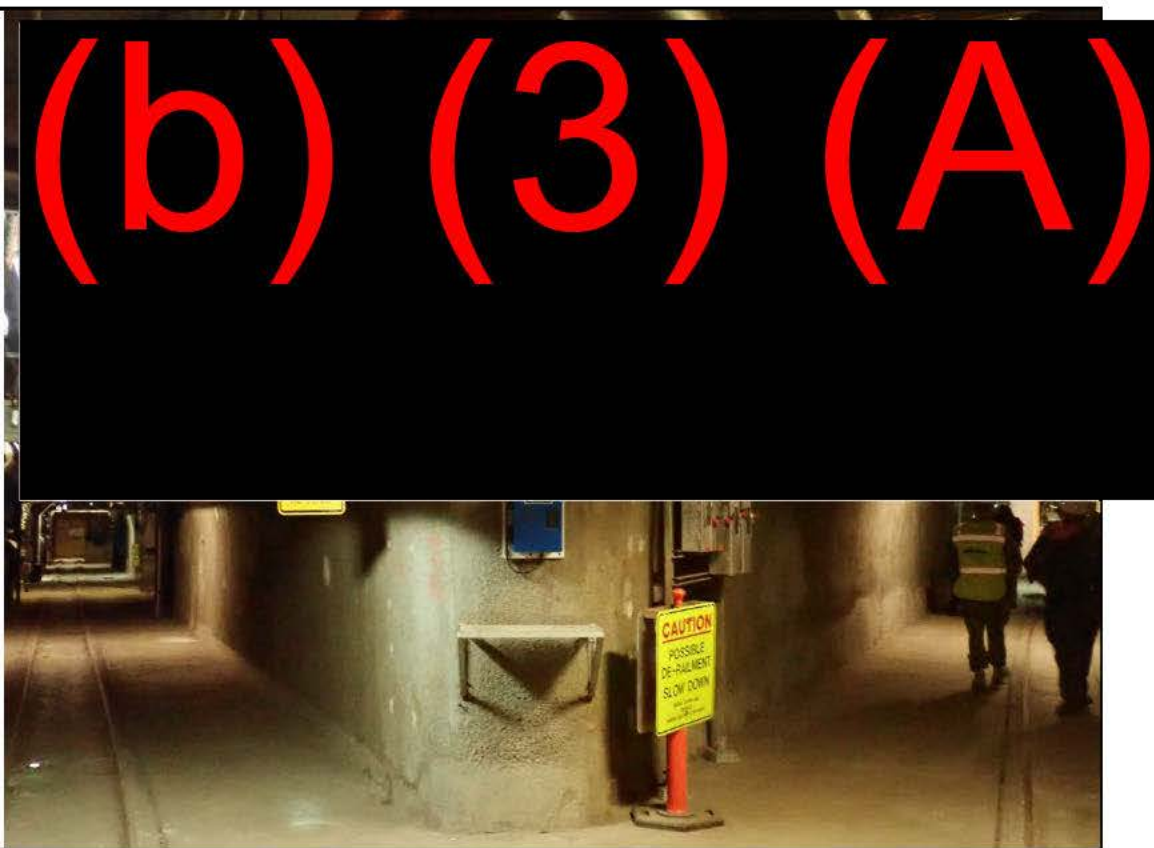
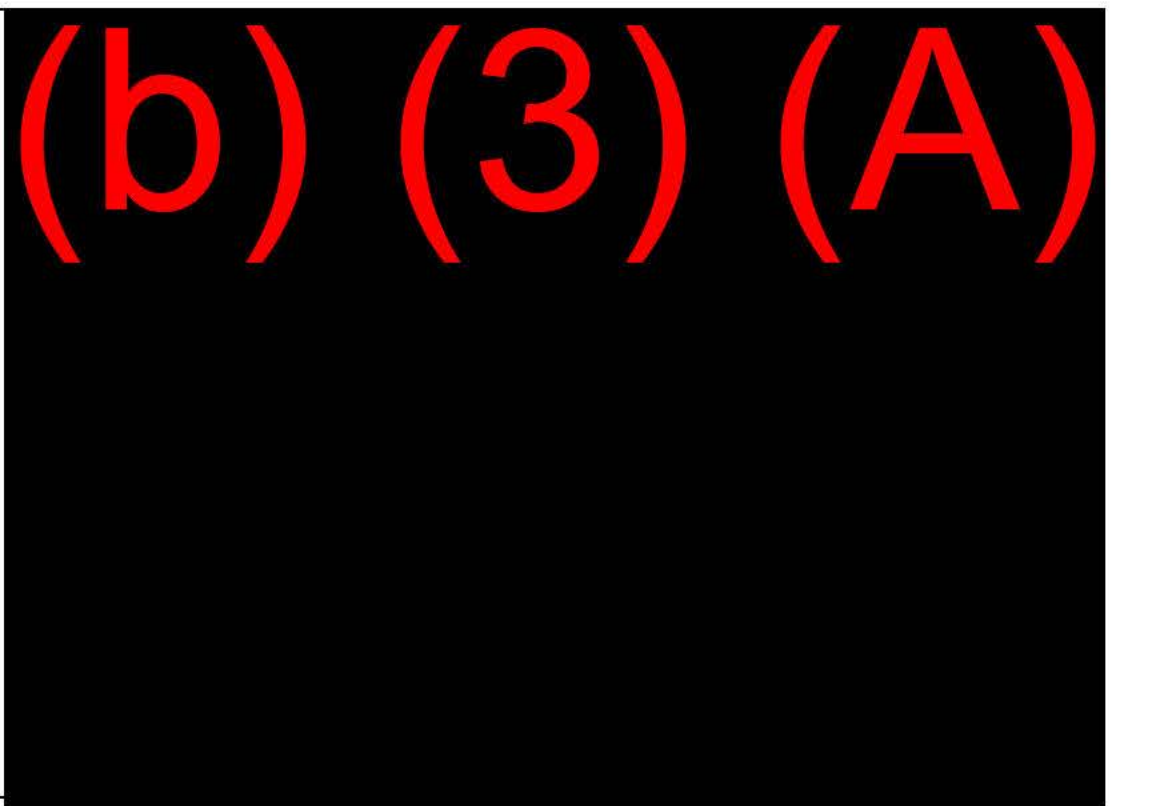


Photo No. 102	Time: 1257
Direction Photo Taken: In Lower Tunnel	
Photo Description: Plastic XXXX line in tunnel to Adit XX entrance.	



Photographer: WITUL	
Photo No. 103	
Time: 1305	
Direction Photo Taken: SE	
Photo Description: Tank S311 Fuel Oil Recovery tank in walled containment dike, near Adit 3 entrance.	

U.S. Environmental Protection Agency
Region 9 Oil Program

SPCC PHOTOGRAPHIC LOG

Facility Name & Location:

Joint Base Pearl Harbor Hickam / Red Hill Fuel Supply Facility

Photographer:

J Witul

Camera:

Olympus Tough TG-5

Dates Photographs
Were Taken:

March 2, 2022

Photo No.

1

Time:

0940

Direction Photo
Taken:

NE

Photo Description:

Fuel lines from Hotel
Pier going
underground.
Middle line is non-
operational.



Photo No.

2

Time:

0941

Direction Photo
Taken:

ENE

Photo Description:

Fuel lines from Hotel
Pier going
underground, additional
view.



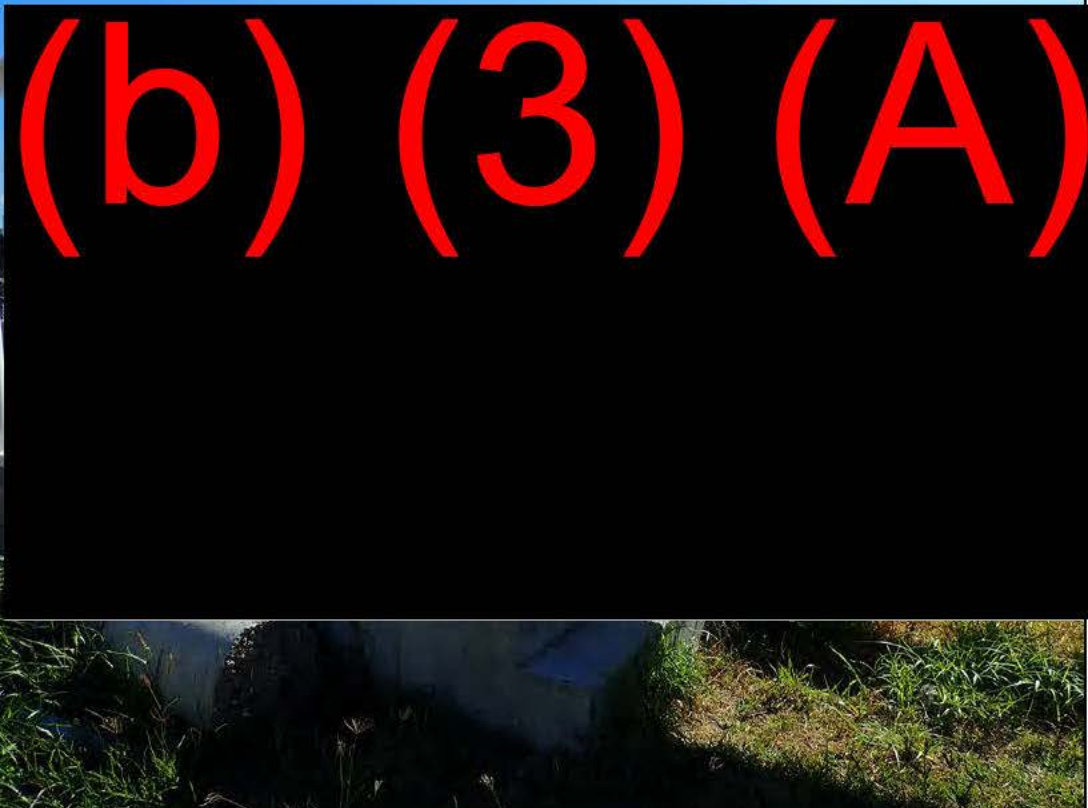
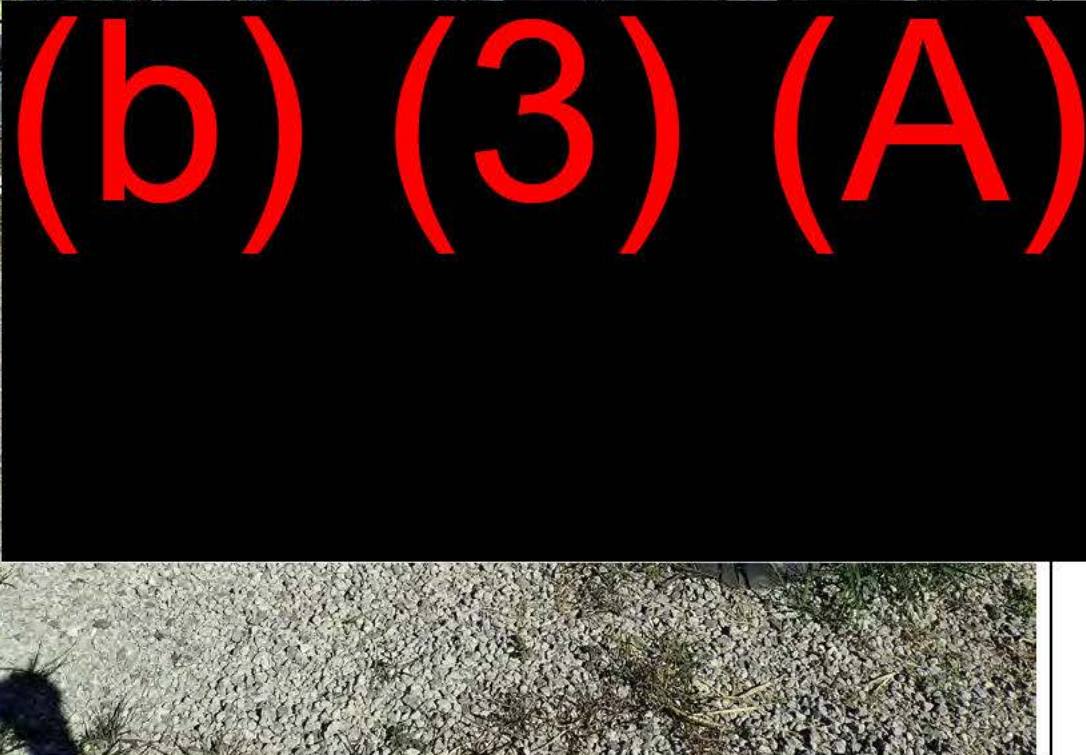
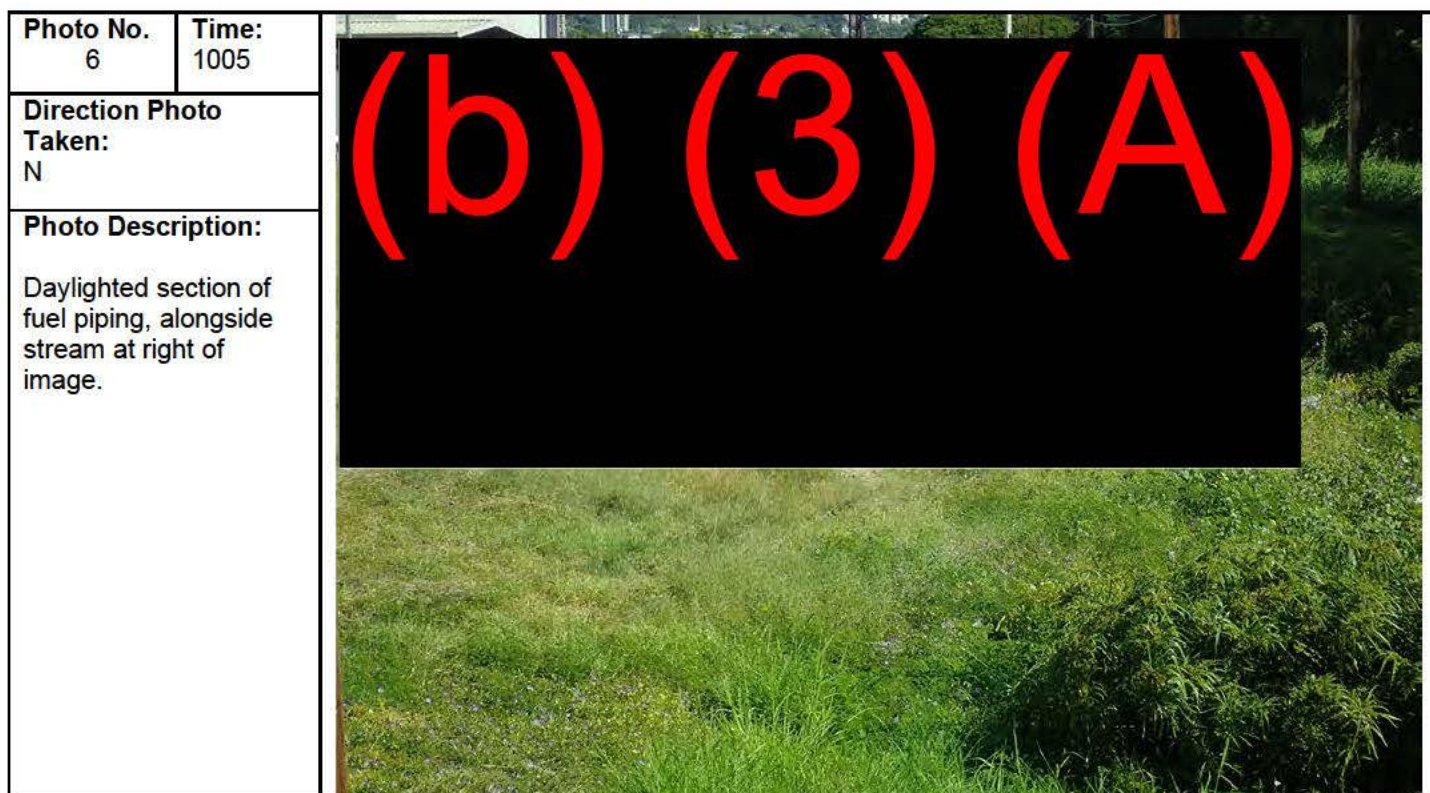
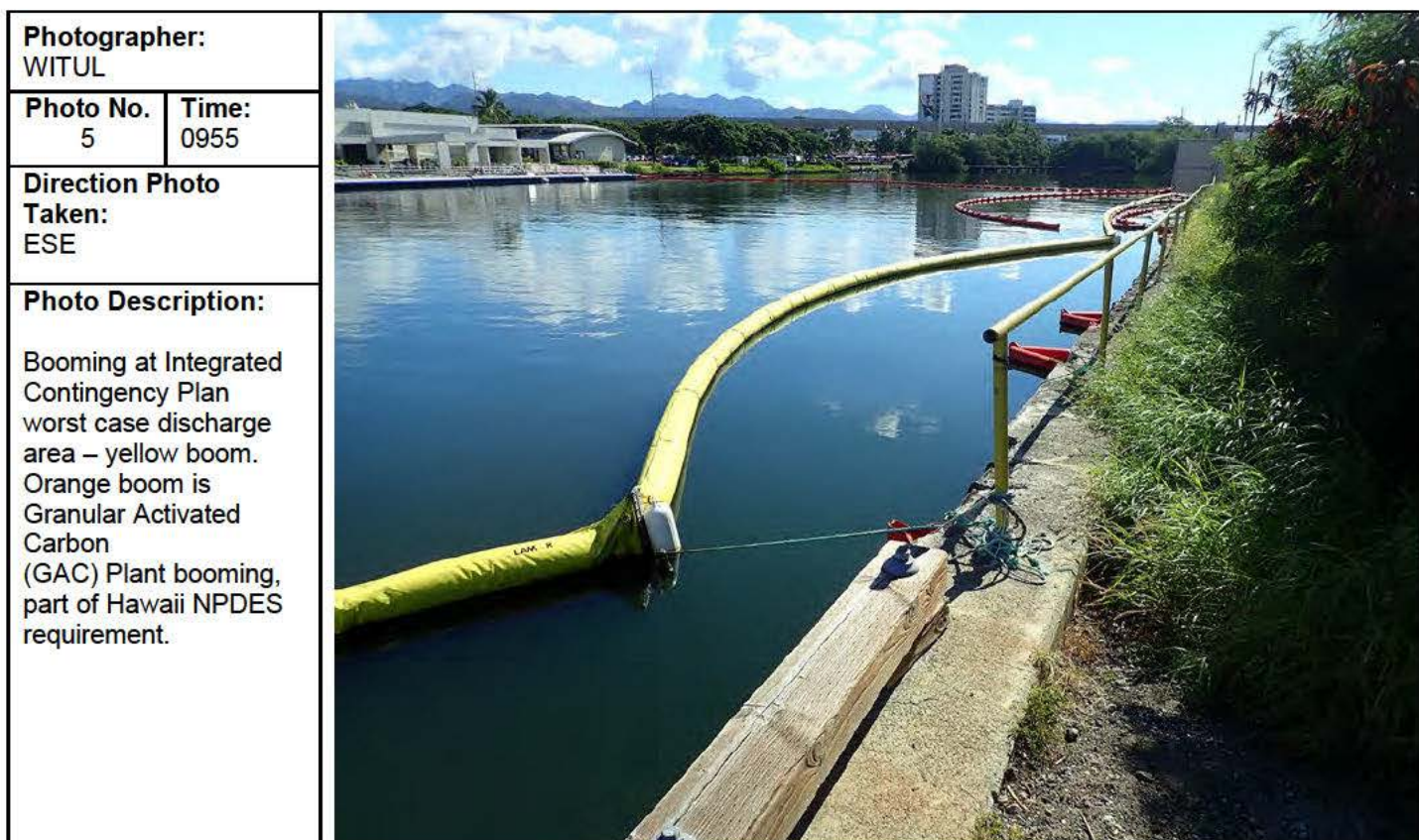
Photographer: WITUL		
Photo No. 3	Time: 0944	
Direction Photo Taken: E		
Photo Description: Pipes, valves, and secondary containment dike at Valve Station [redacted] pipe side to Hotel Pier.		

Photo No. 4	Time: 0948	
Direction Photo Taken: NNW		
Photo Description: Piping from Valve Station [redacted] to Underground Pump House.		



Photographer: WITUL		
Photo No. 7	Time: 1010	
Direction Photo Taken: ENE		
Photo Description: Frac tanks near Adit entrance; collapsed containment visible at rear of tank SB7104.		

Photo No. 8	Time: 1010	
Direction Photo Taken: SW		
Photo Description: Collapsed containment corner at Frac tank SB7104.		



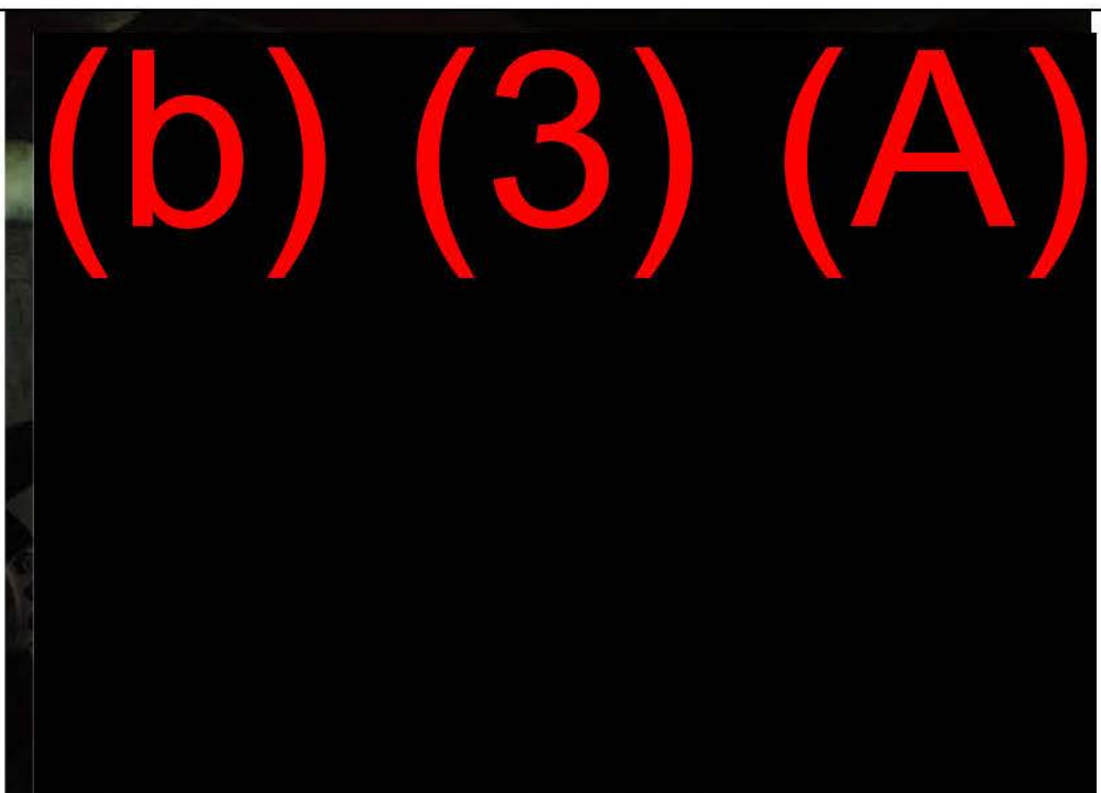
Photographer: WITUL	
Photo No. 9	Time: 1013
Direction Photo Taken: NE	
Photo Description: 1000-gallon diesel ConVault Tank FLC-Adit  , outside entrance to Adit  . Indicator gauge exhibits aging, corrosion visible on piping. No containment measures for piping or transfers (such as spill kit) evident in area.	



Photo No. 10	Time: 1023
Direction Photo Taken: Close-up	
Photo Description: Valves and piping in Lower Yard Tunnel at Underground Pump House.	



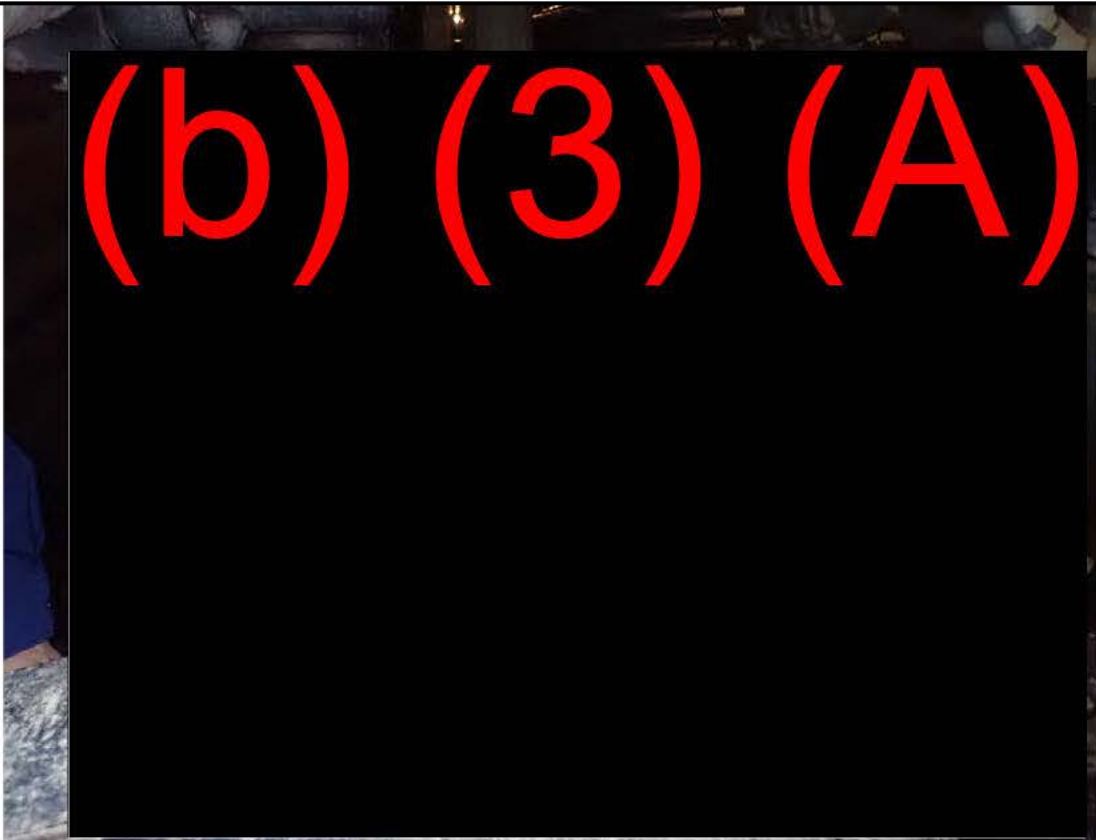
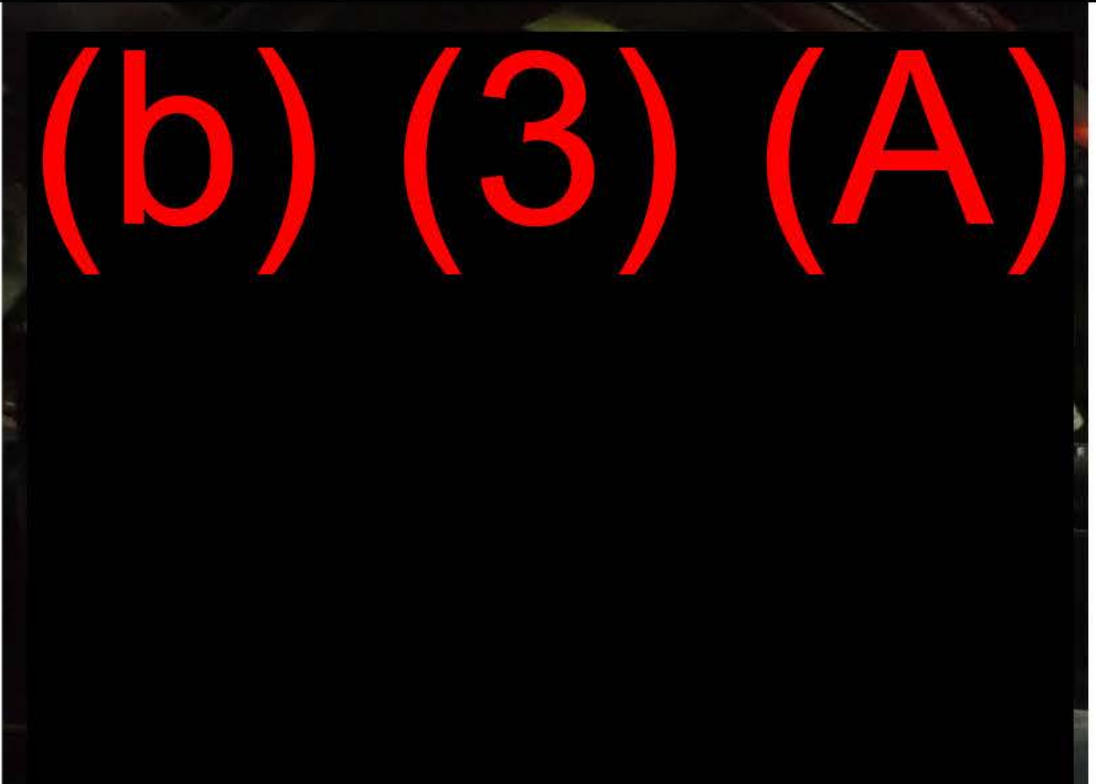
Photographer: WITUL		
Photo No. 11	Time: 1023	
Direction Photo Taken: Close-up		
Photo Description: Valves and piping in Lower Yard Tunnel. Fully contained area is preferable as EPA/USCG jurisdictional boundary.		

Photo No. 12	Time: 1024	
Direction Photo Taken: Close-up		
Photo Description: Valves and piping in Lower Yard Tunnel.		

Photographer: WITUL	
Photo No. 13	Time: 1025
Direction Photo Taken: Close-up	
Photo Description: Piping in Lower Yard Tunnel.	

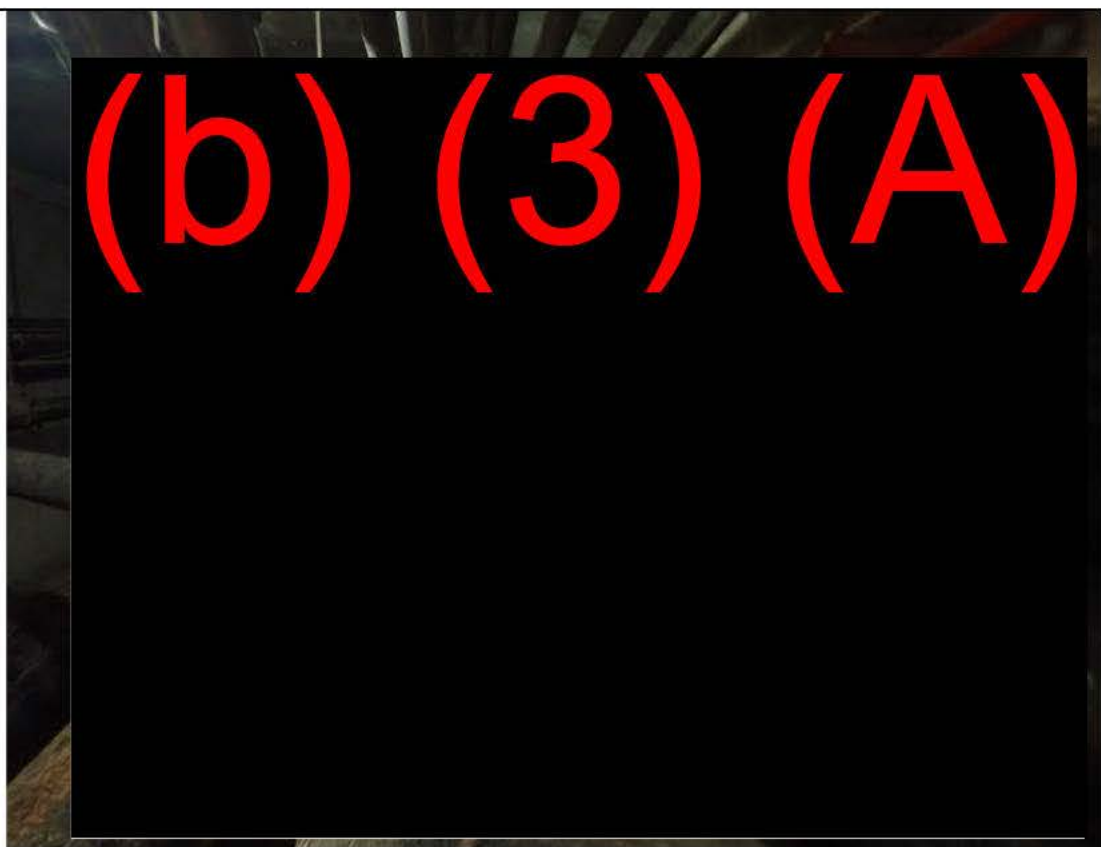
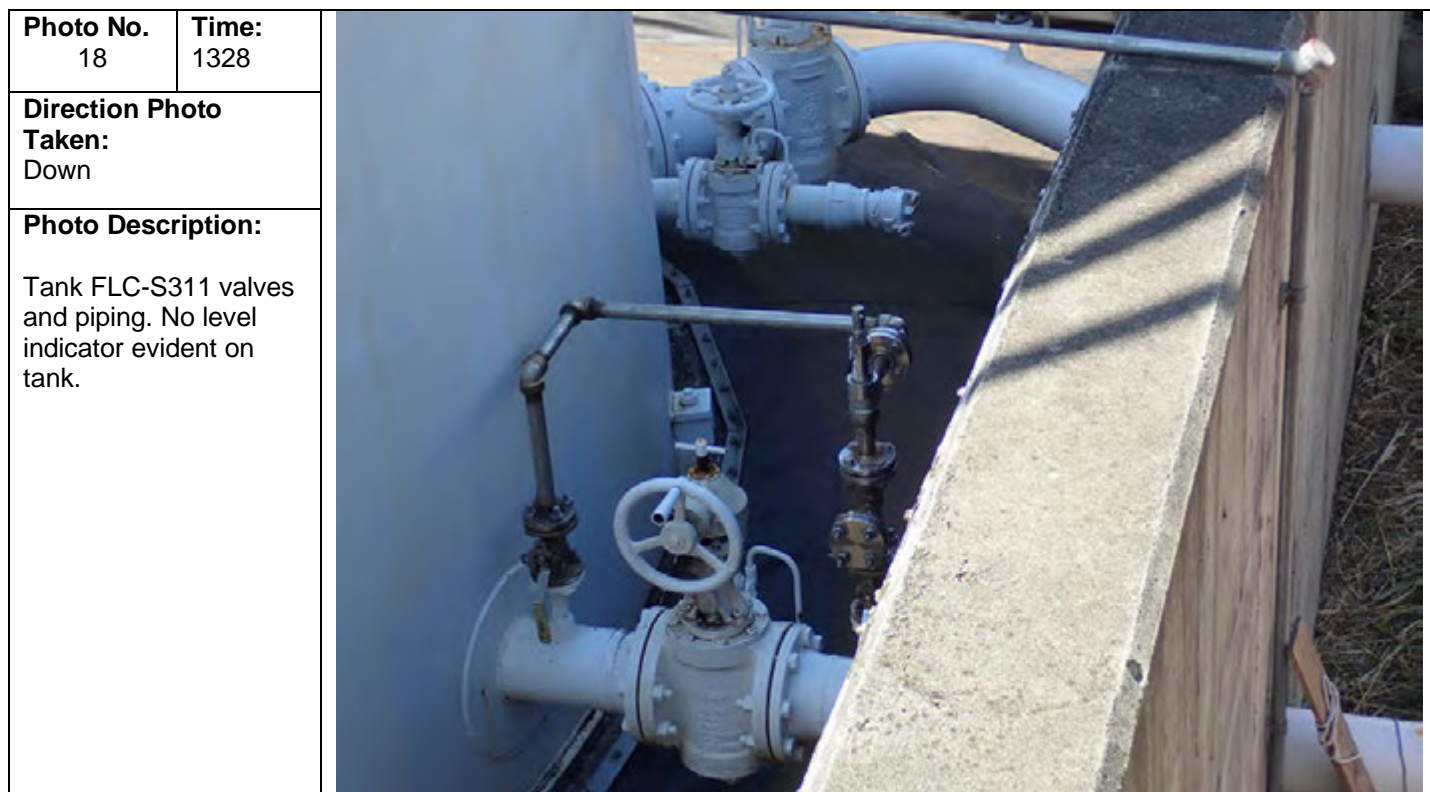


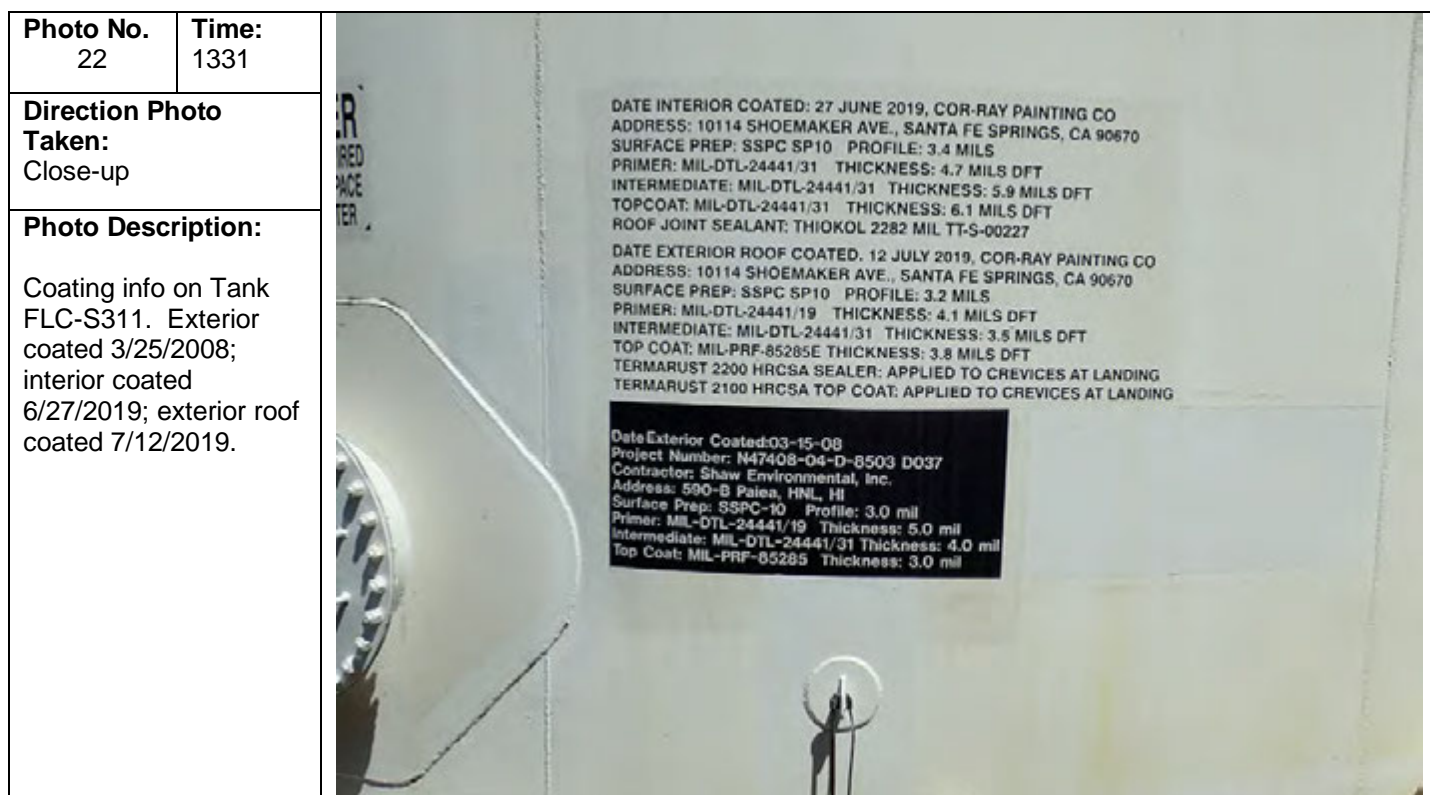
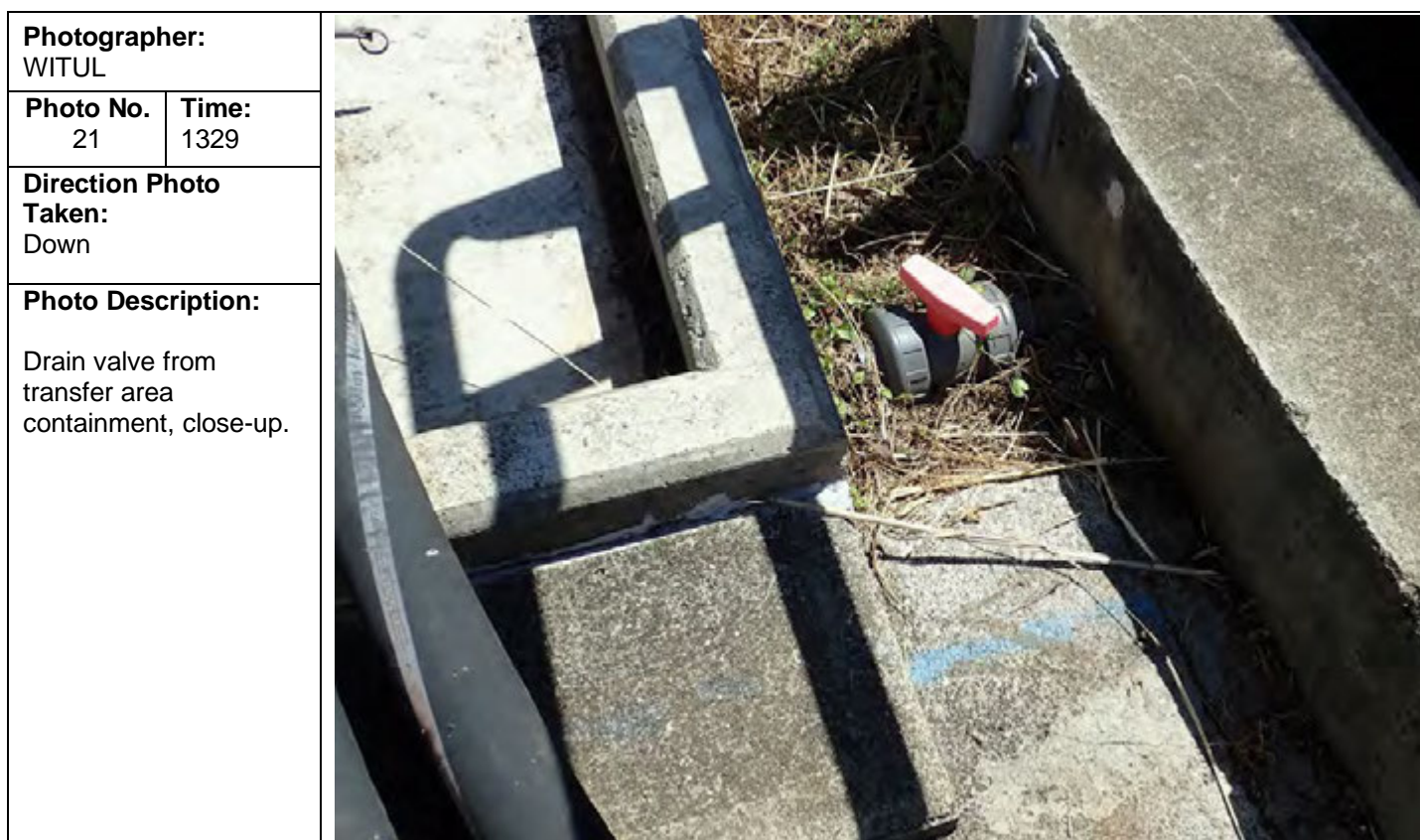
Photo No. 14	Time: 1322
Direction Photo Taken: SW	
Photo Description: Aqueous Film Forming Foam (AFFF) Retention Tank with lined containment area.	

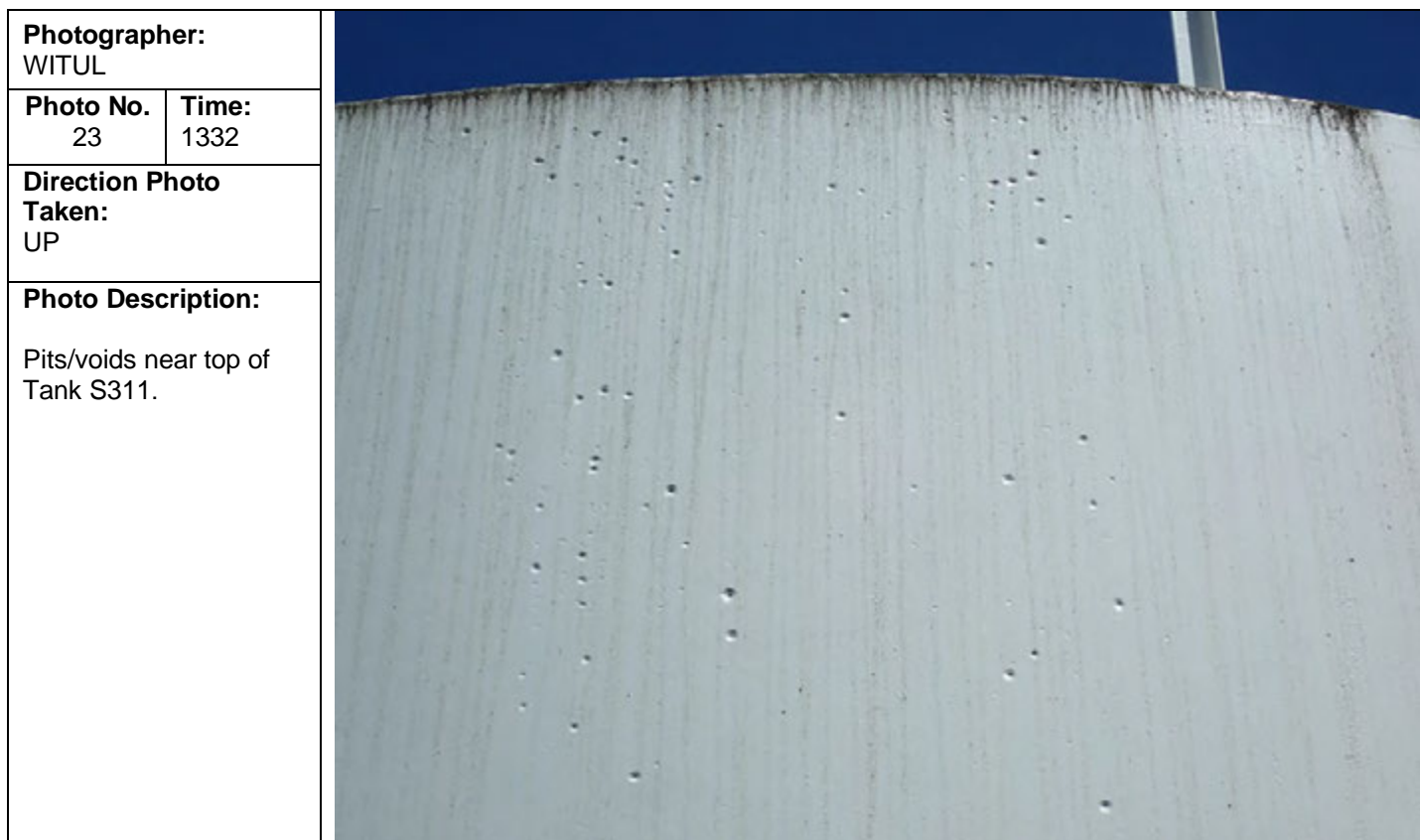












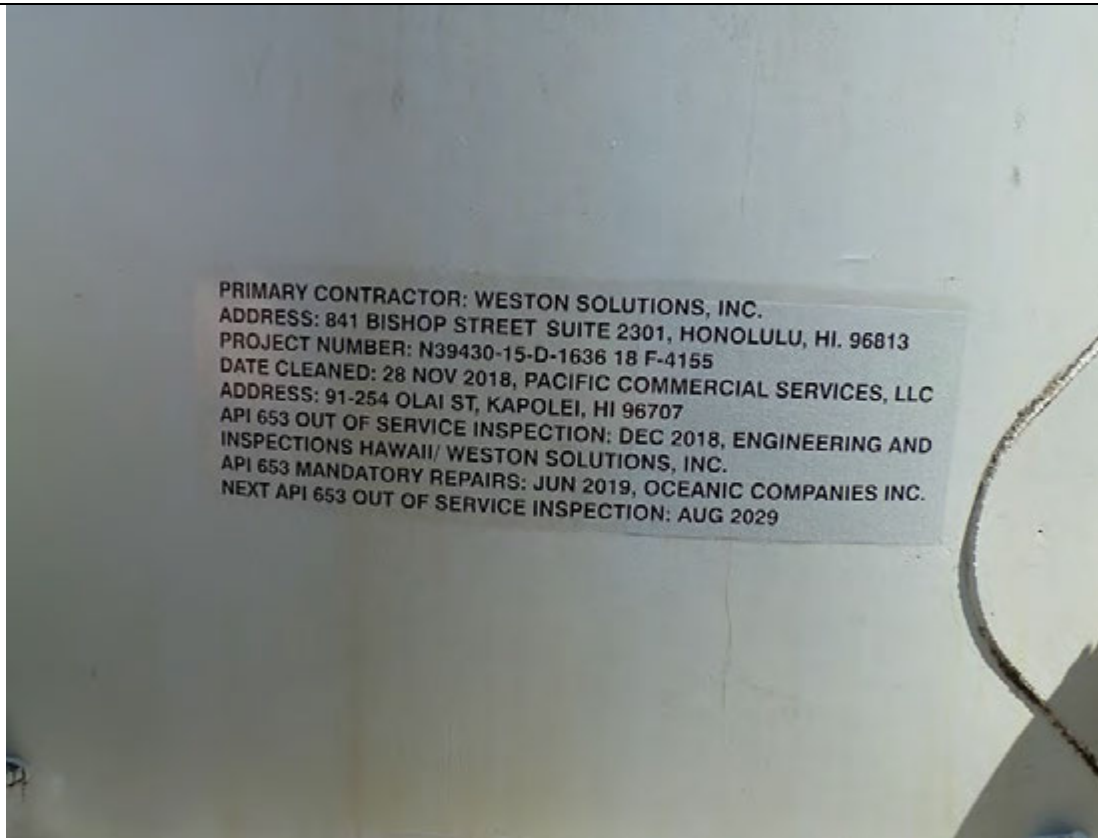
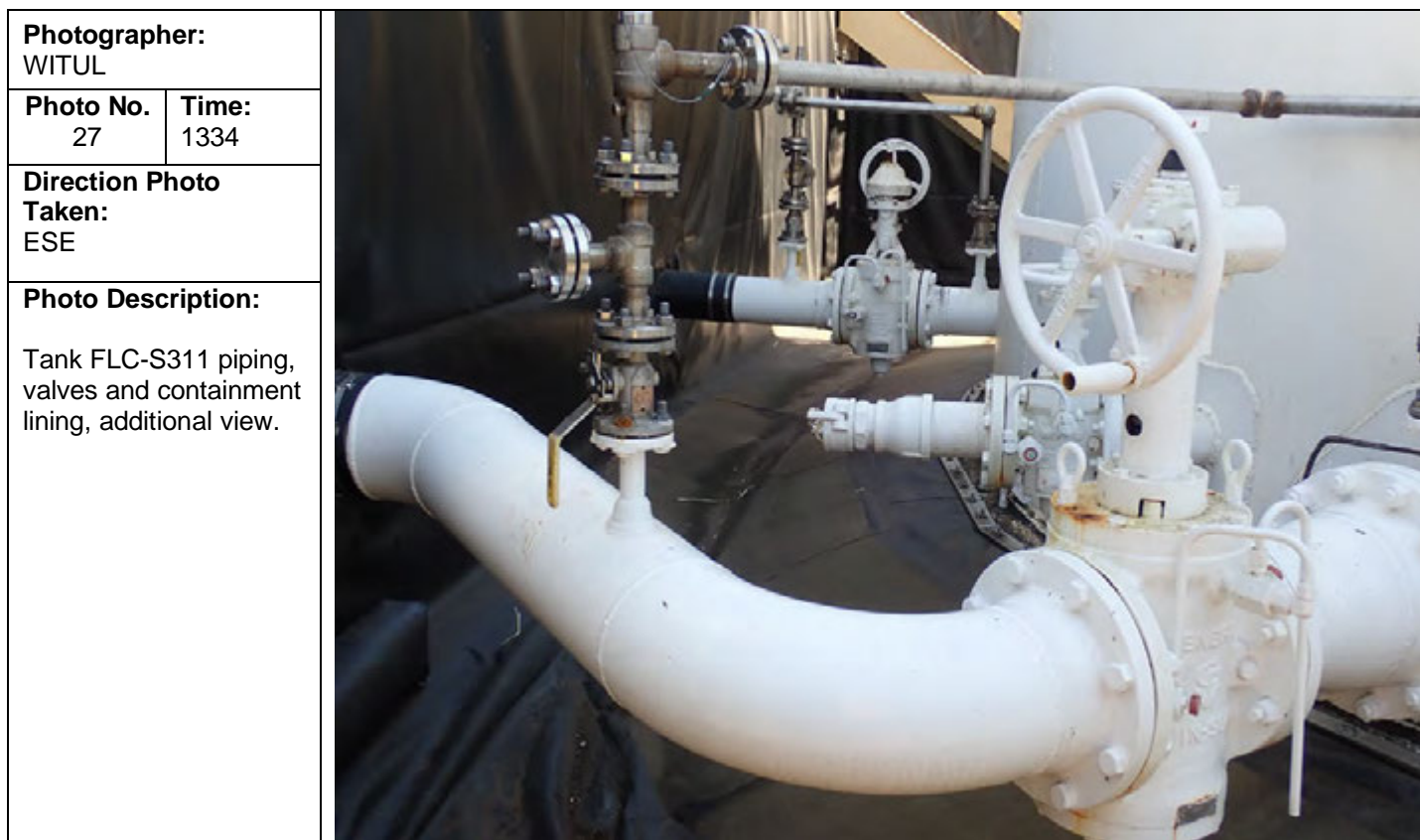
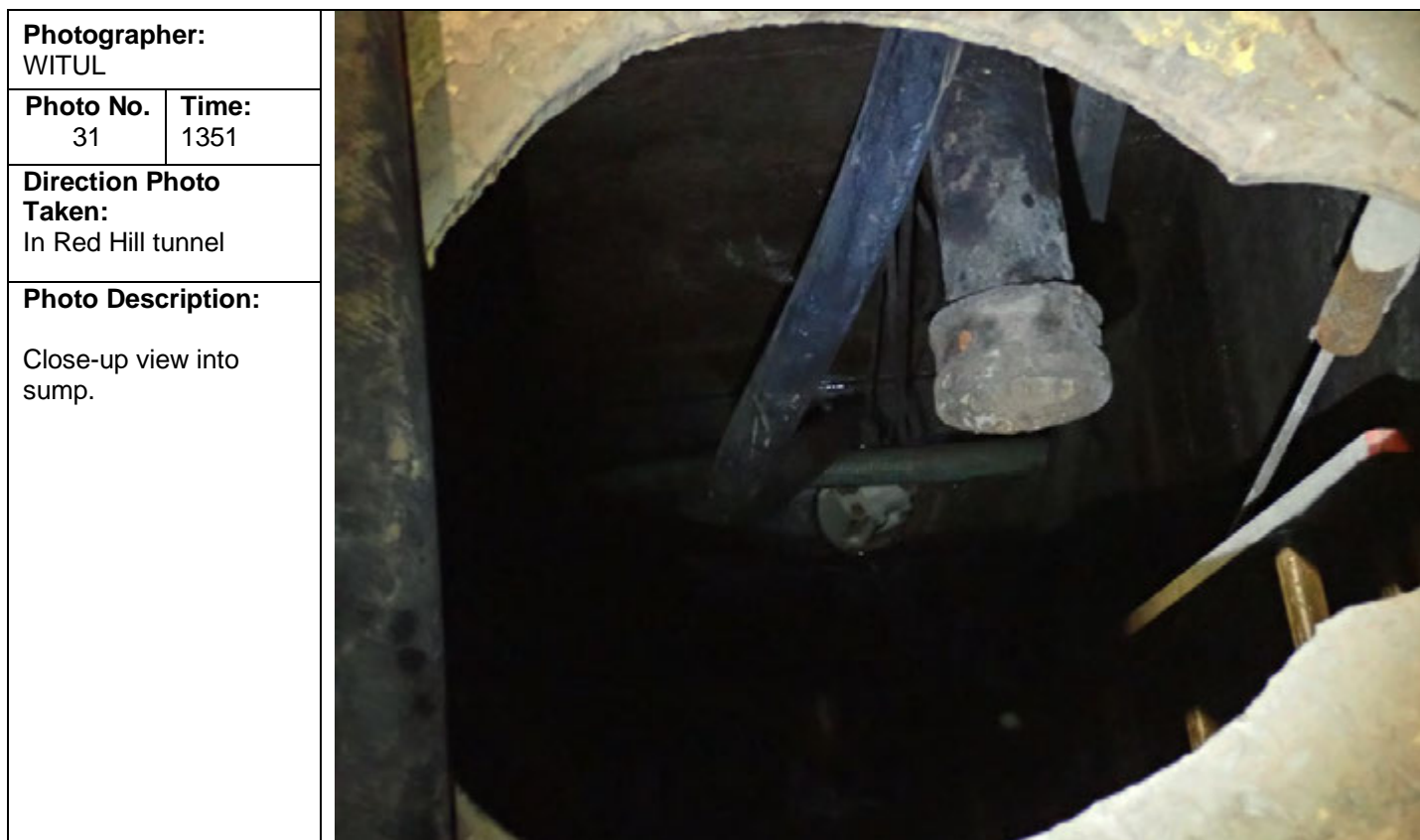
Photographer: WITUL		
Photo No. 25	Time: 1333	
Direction Photo Taken: Close-up		
Photo Description: Cleaning, inspection, and repair information on Tank FLC-S311 for work performed Nov. 2018 through Jun 2019.		

Photo No. 26	Time: 1334
Direction Photo Taken: Down	
Photo Description: Additional sump in corner of Tank S-311 walled containment.	

A photograph taken from a high angle looking down into a square, walled metal sump. The sump is filled with a dark, greenish-brown liquid, possibly oil or a chemical solution, which has some debris floating in it. The sump is surrounded by a dark, metallic structure, likely part of a larger tank or containment system. The lighting is somewhat dim, and the overall tone is dark and industrial.







Photographer: WITUL	
Photo No. 33	Time: 1358
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Water well; Red Hill water shaft, diver's access.	

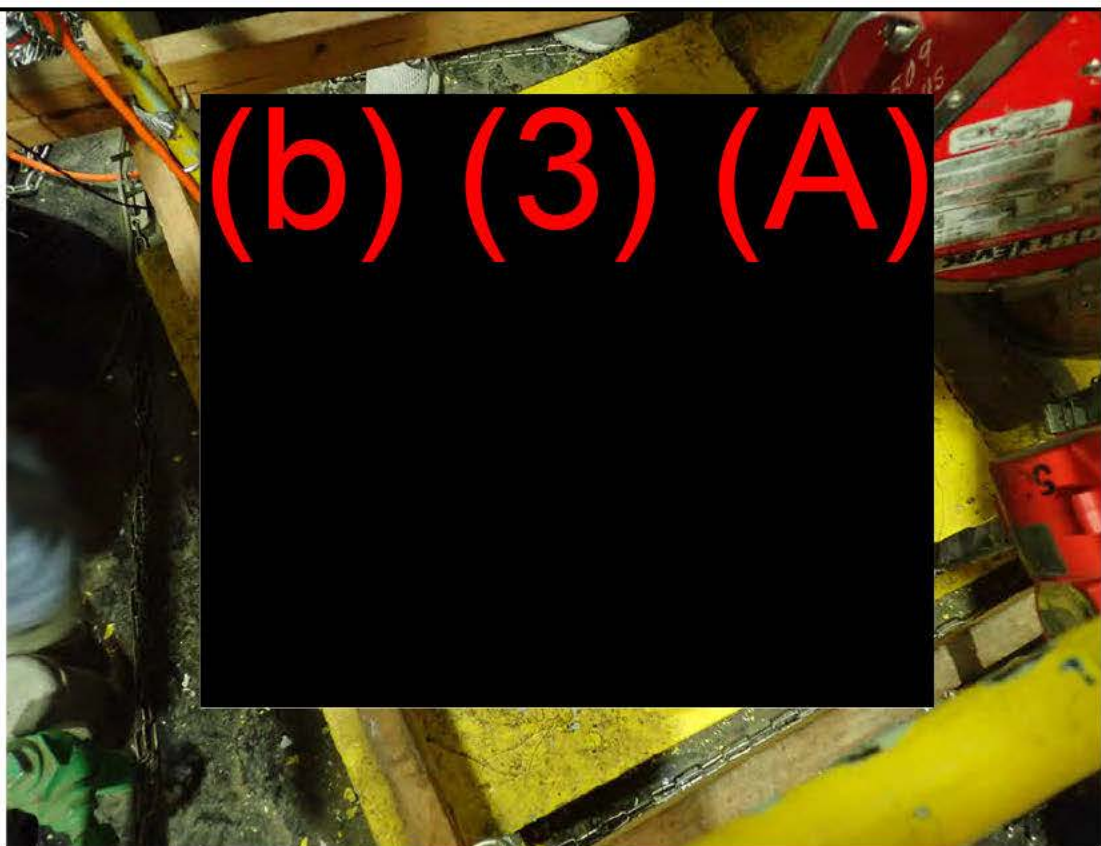
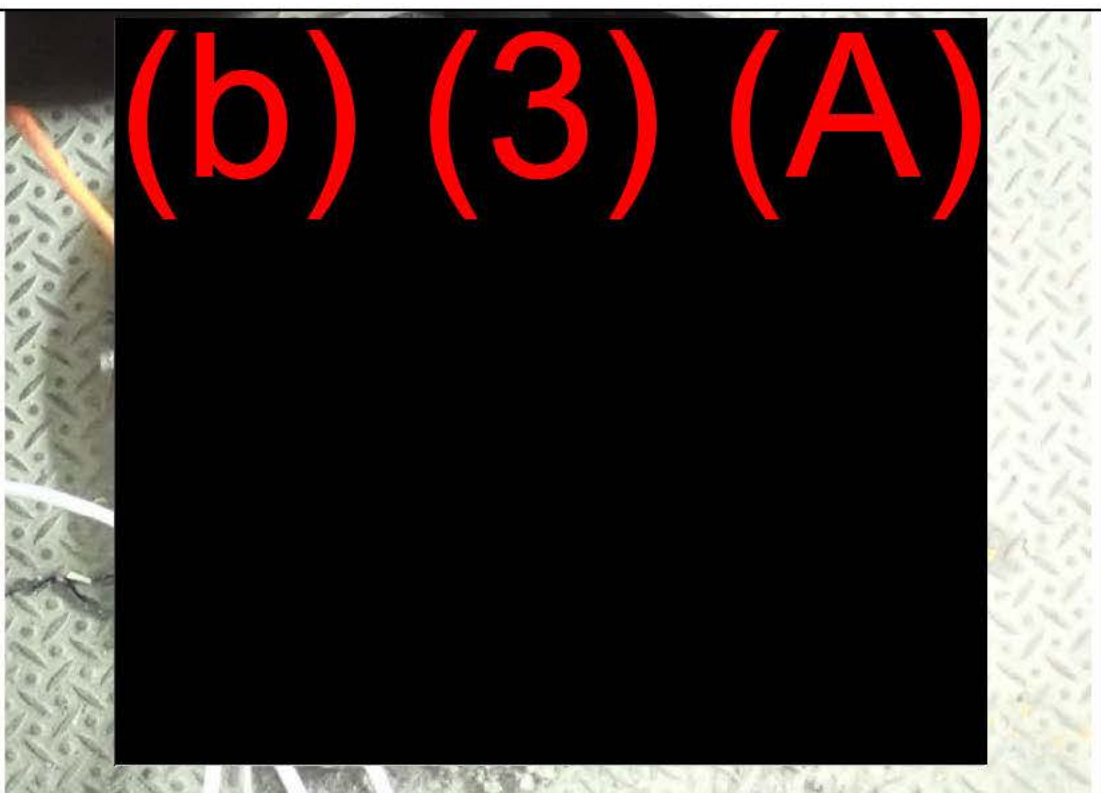


Photo No. 34	Time: 1359
Direction Photo Taken: Down	
Photo Description: View down well shaft; water is approximately [REDACTED] below this surface.	



Photographer: WITUL	
Photo No. 35	Time: 1406
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Valves for Tank 11; between piping supports (b) (3) (A) .	

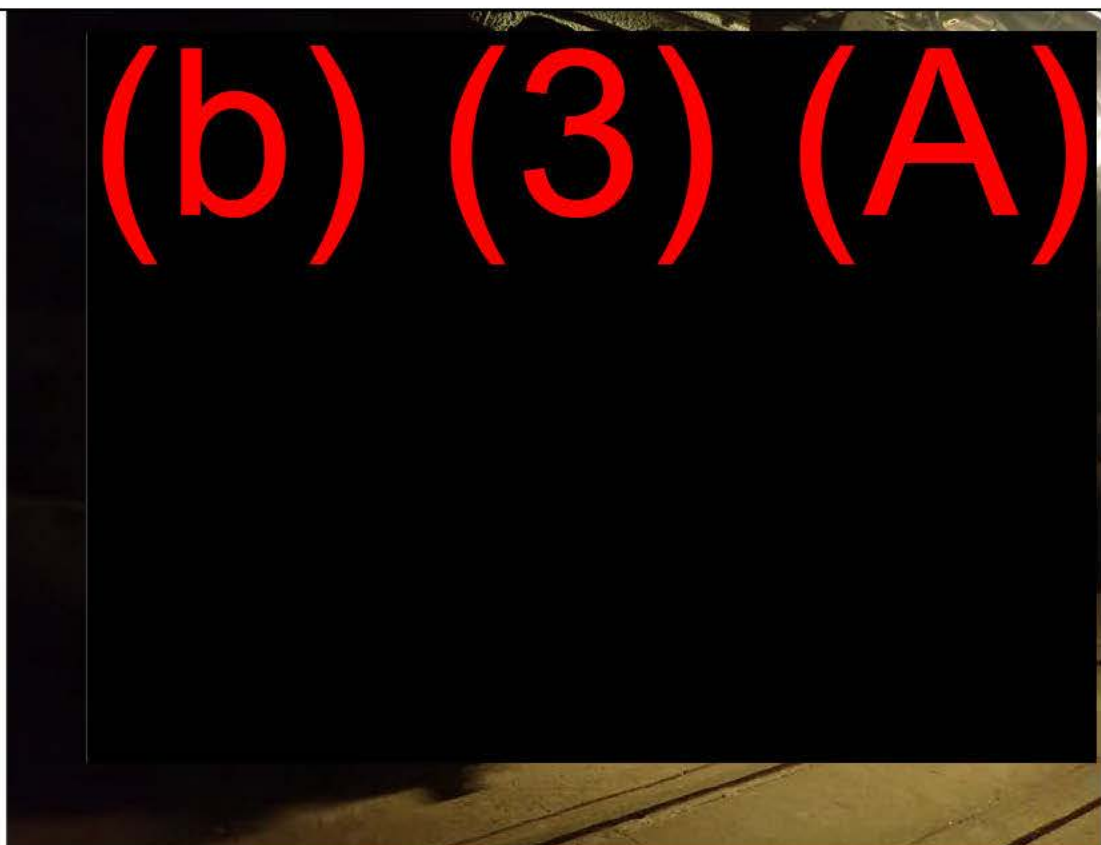


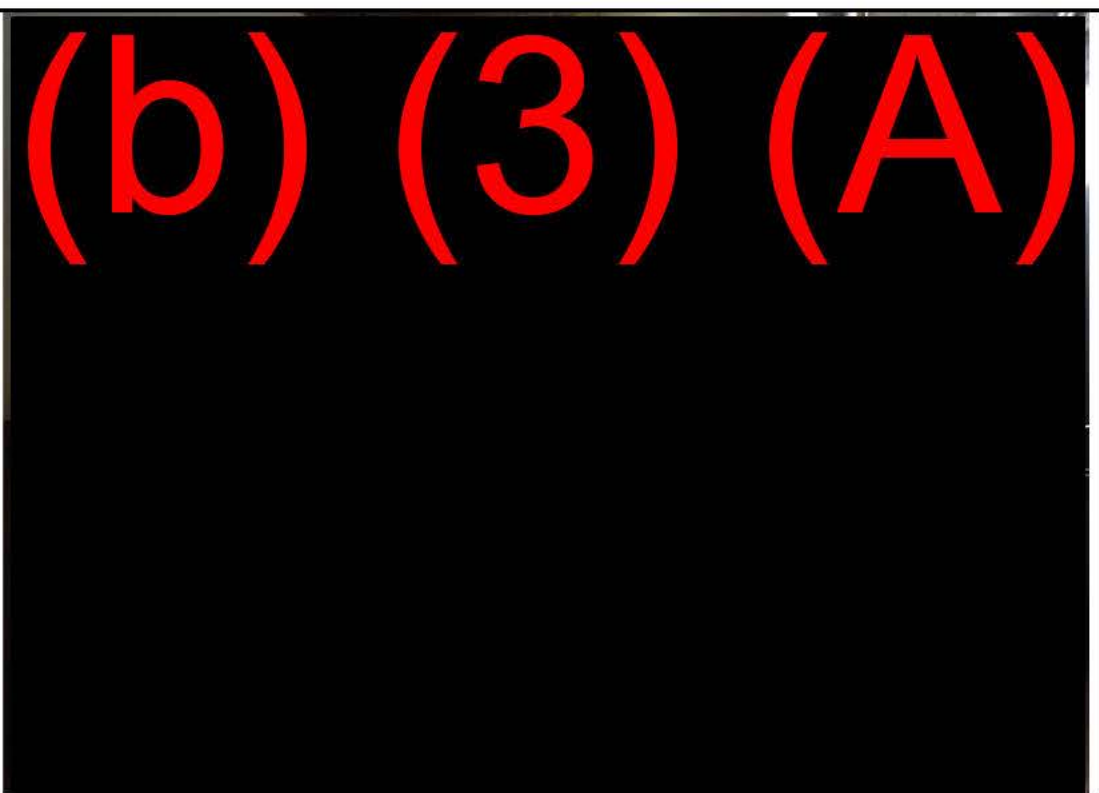
Photo No. 36	Time: 1410
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Piping system - reportedly an obsolete fire suppression system, not associated with fuel.	



Photographer: WITUL	
Photo No. 37	Time: 1410
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Piping system thought to be obsolete fire suppression system, additional view.	



Photo No. 38	Time: 1414
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Red Hill Fuel Supply System pipelines: <div style="background-color: black; color: red; padding: 2px;">(b) (3) (A)</div> (F-76, bottom); <div style="background-color: black; color: red; padding: 2px;">(b) (3) (A)</div> (JP-5, middle); and <div style="background-color: black; color: red; padding: 2px;">(b) (3) (A)</div> (F-24, top).	



Photographer: WITUL	
Photo No. 39	Time: 1416
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Typical piping support, at (b) (3) (A) Vertical section at top edge may pose hazard to pipe if there is excessive movement. Excessive corrosion at section nearest wall may compromise ability to support pipe.	

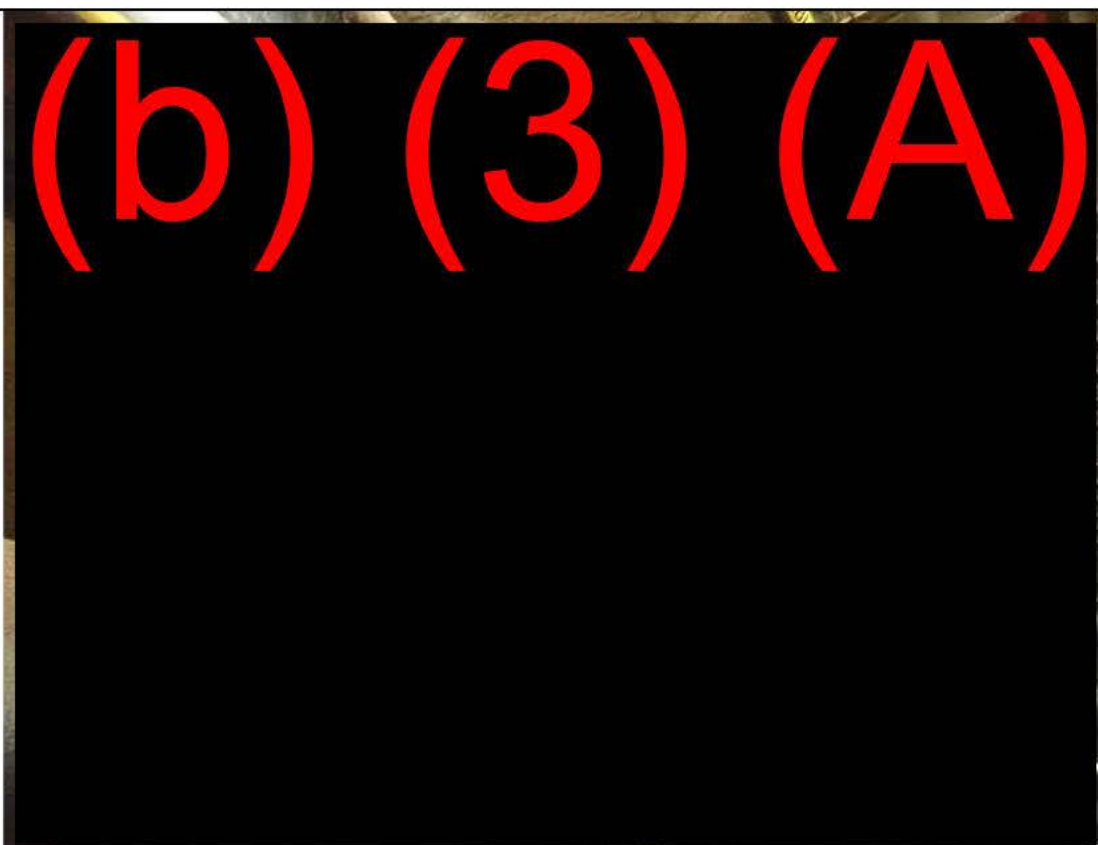


Photo No. 40	Time: 1418
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Creosote drips under piping, near support (b) (3) (A) Substance may be leaching through walls, from treated timber used in tunnel construction.	



Photographer: WITUL	
Photo No. 41	Time: 1419
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Deterioration/damage to pipe coating and possibly pipe.	

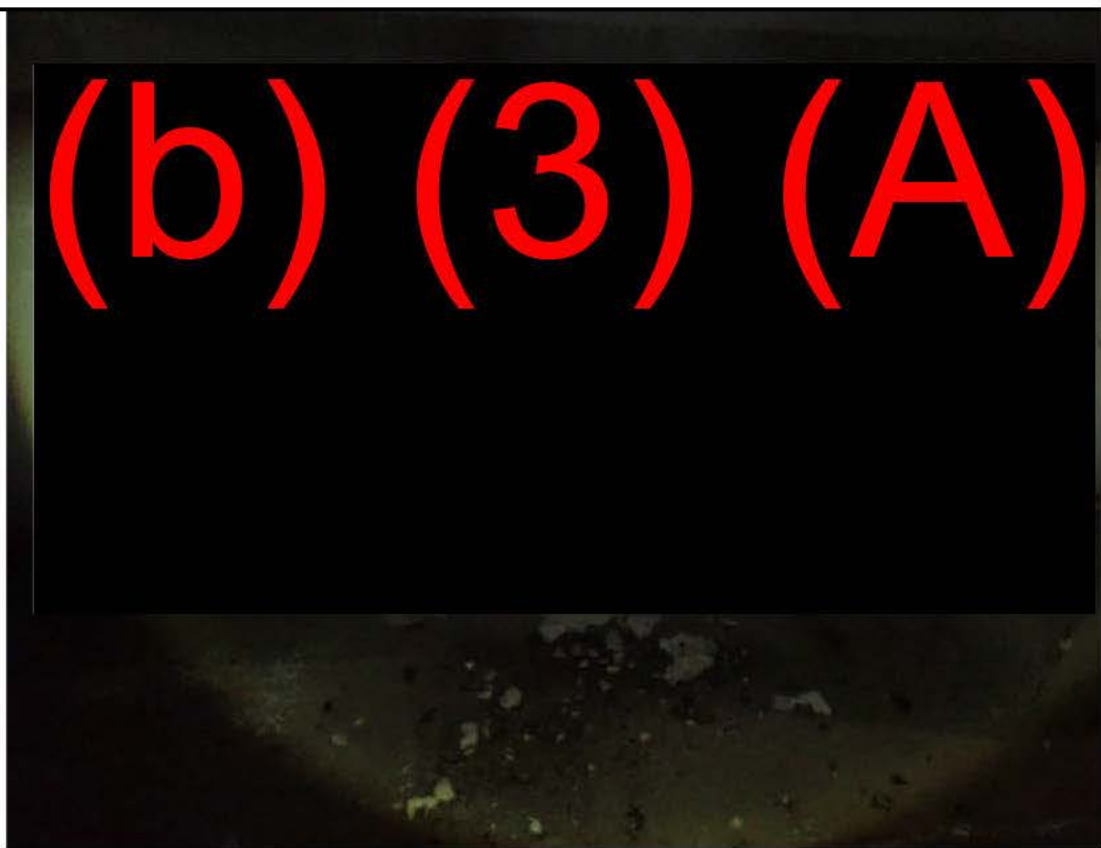
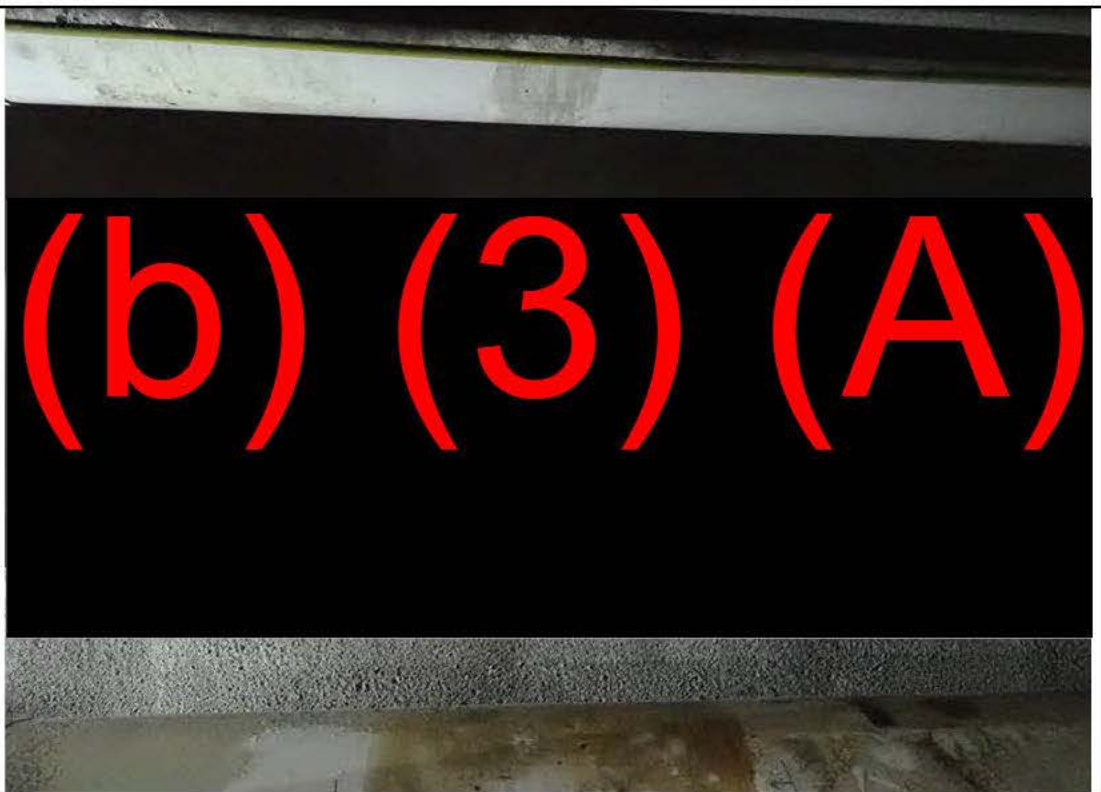


Photo No. 42	Time: 1419
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Deterioration/damage to piping/pipe coating.	



Photographer: WITUL	
Photo No. 43	Time: 1419
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Creosote stains on wall.	

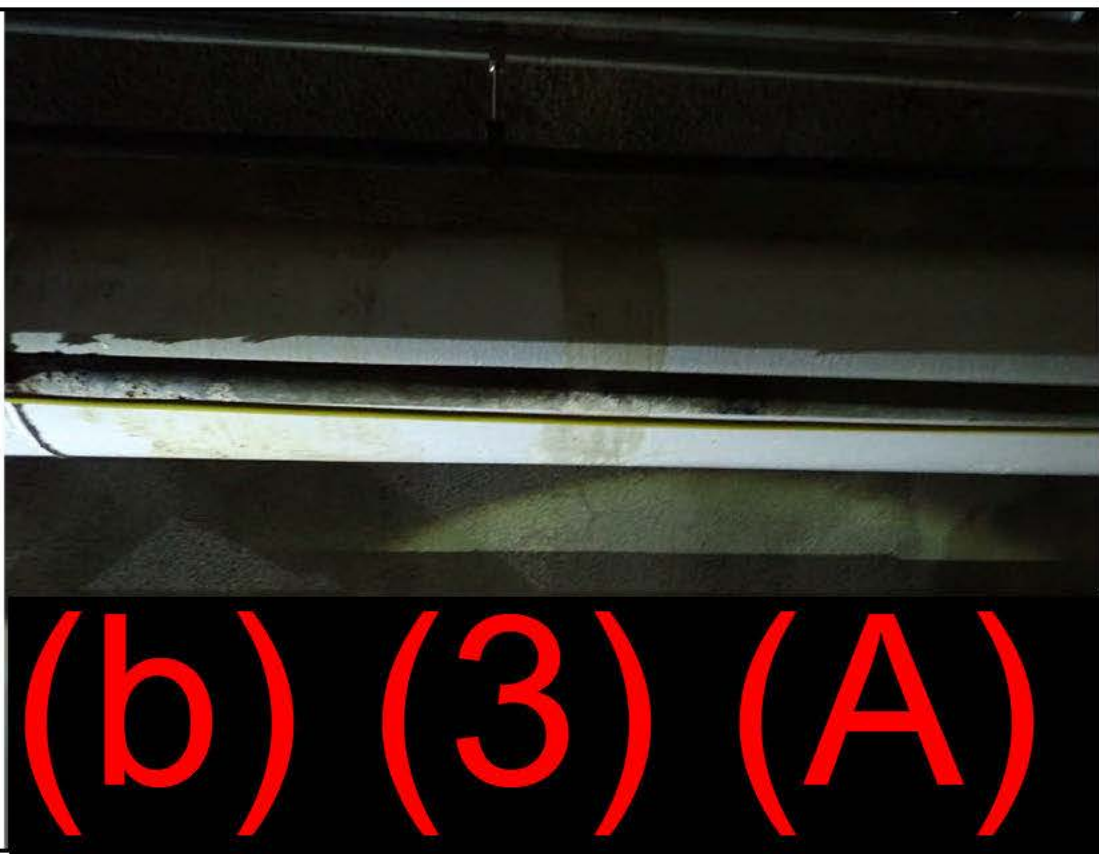
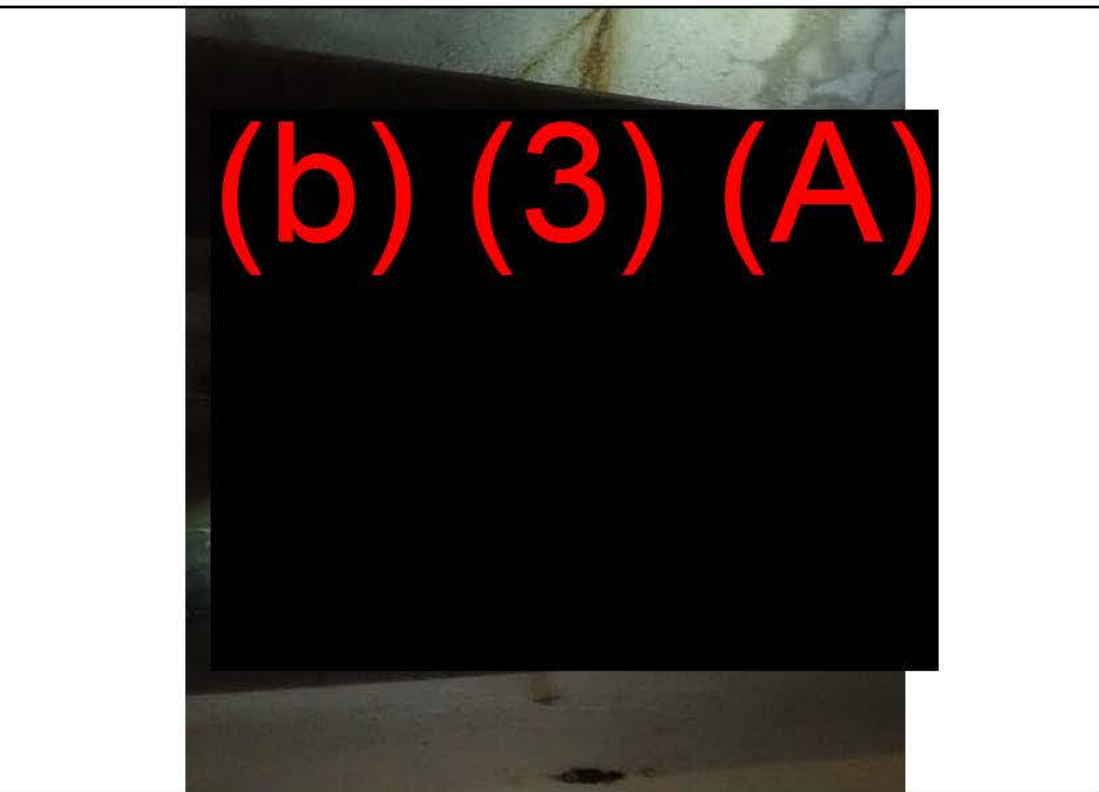


Photo No. 44	Time: 1420
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Creosote stains on wall, and drips on floor.	



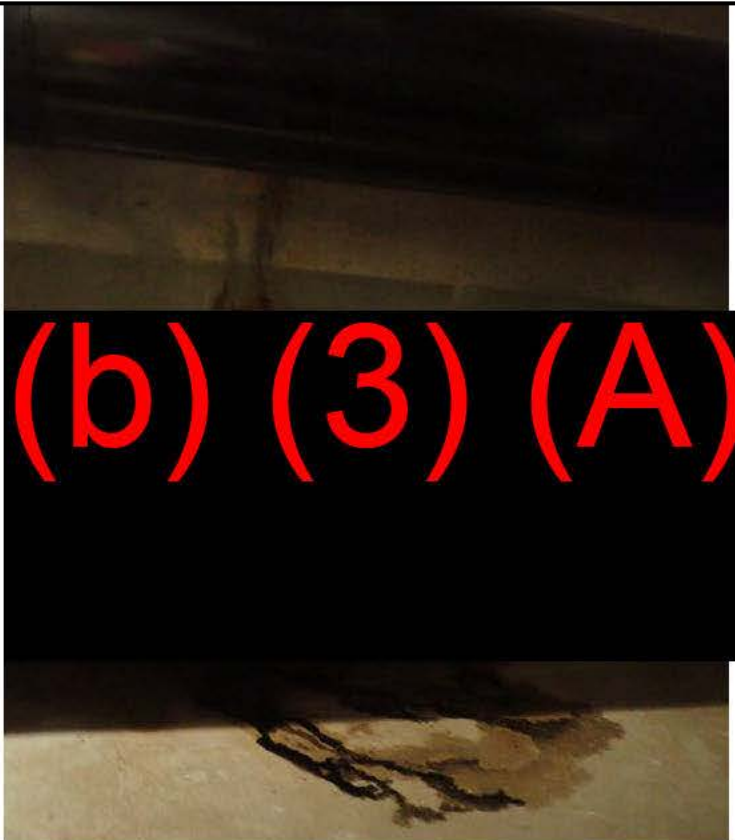
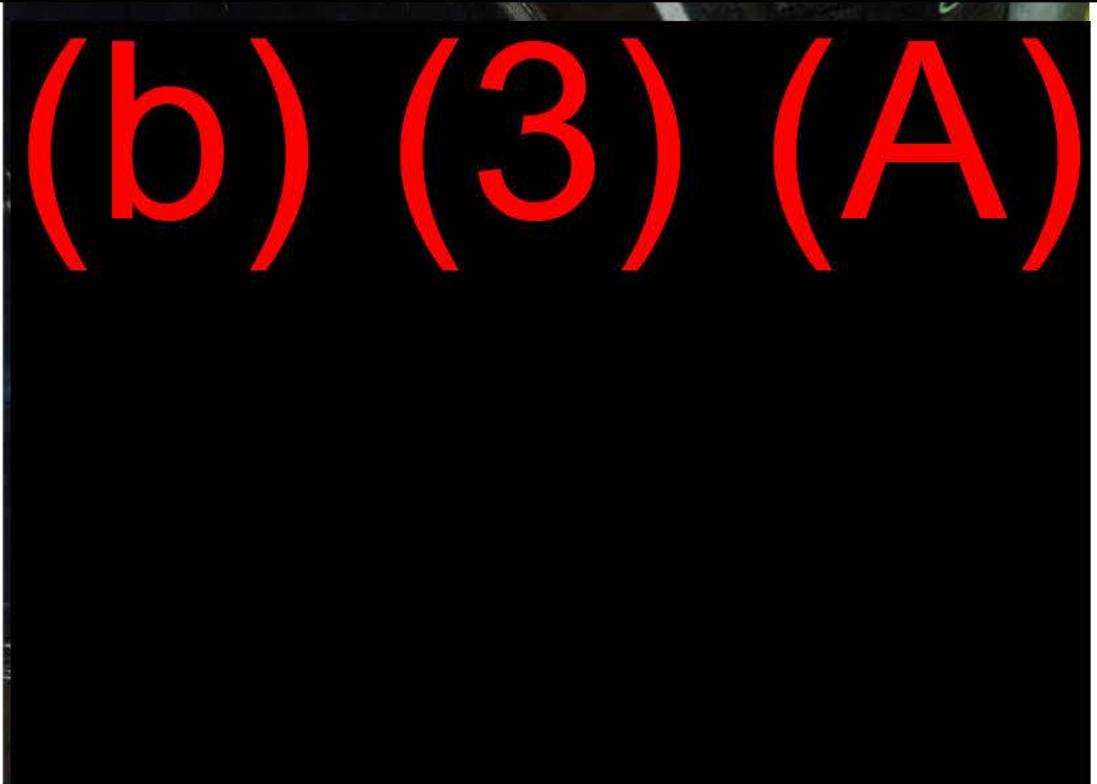
Photographer: WITUL		
Photo No. 45	Time: 1422	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Creosote stains on wall, and floor.		

Photo No. 46	Time: 1422	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Dents in XXXX pipe, near support XXXX .		

Photographer: WITUL	
Photo No. 47	Time: 1425
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents in (b) (3) (A) pipe, marked D/G (b) (3) (A) Pipe markings are issues identified in past inspection(s) of piping, and not yet addressed.	

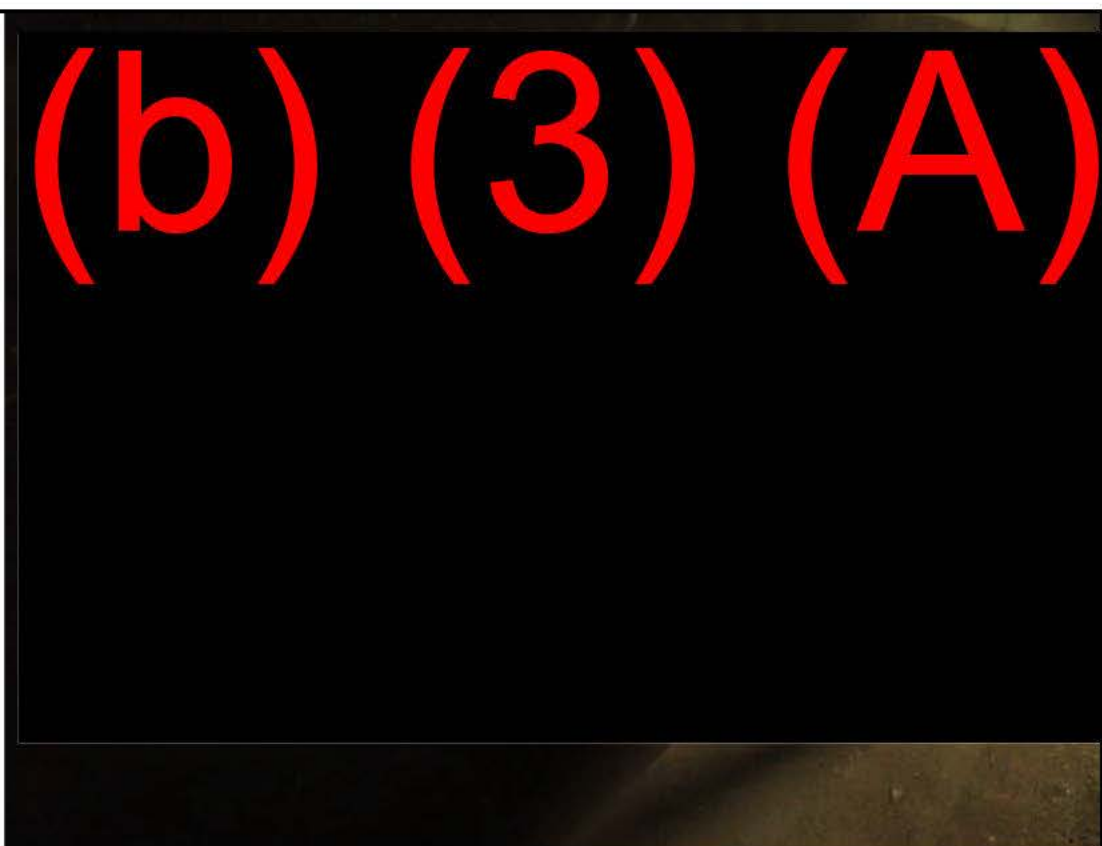
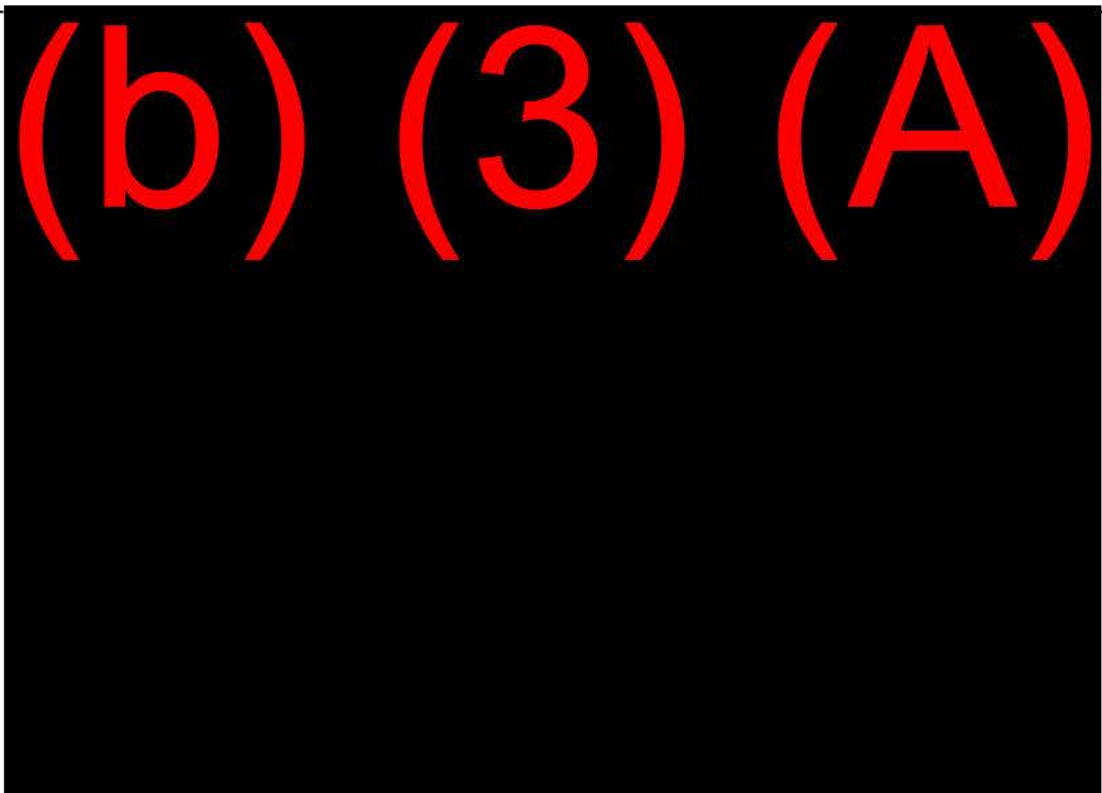


Photo No. 48	Time: 1425
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dent in (b) (3) (A) pipe, marked D/G (b) (3) (A) additional image.	



Photographer: WITUL	
Photo No. 49	Time: 1426
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Deterioration/damage of XXXX pipe coating, near support XXXX	

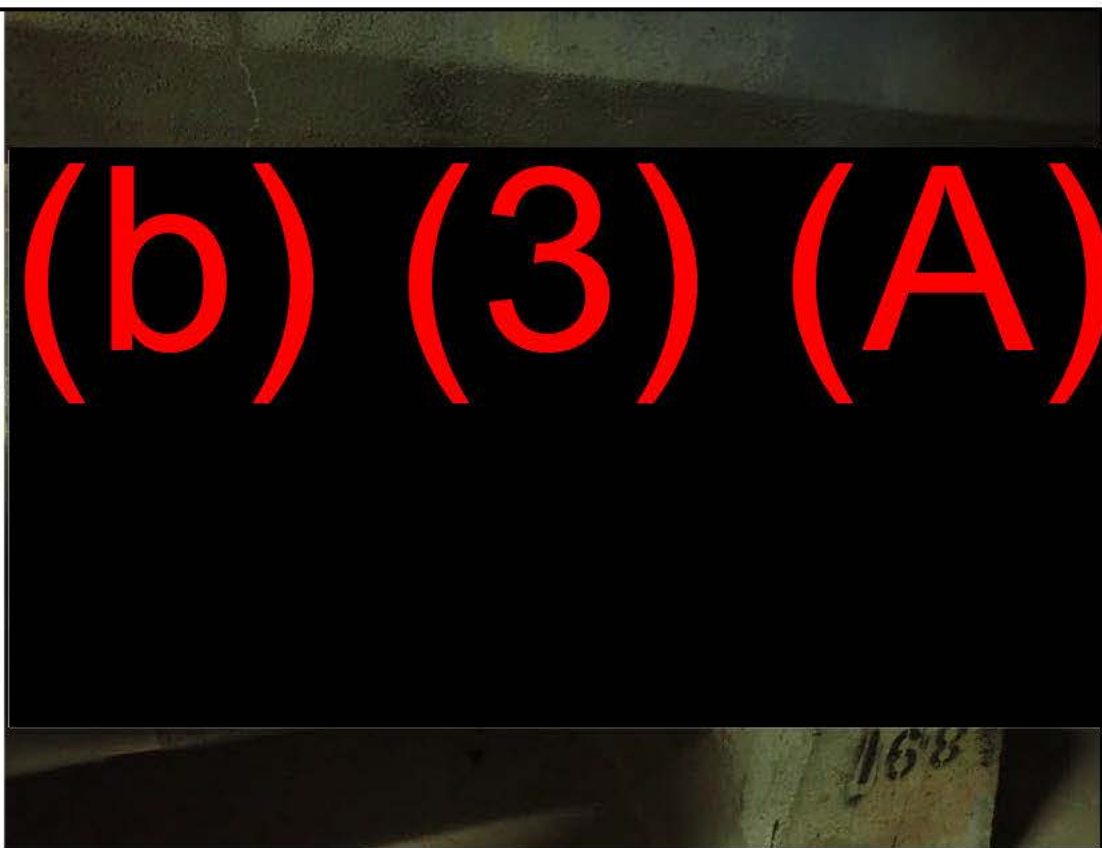
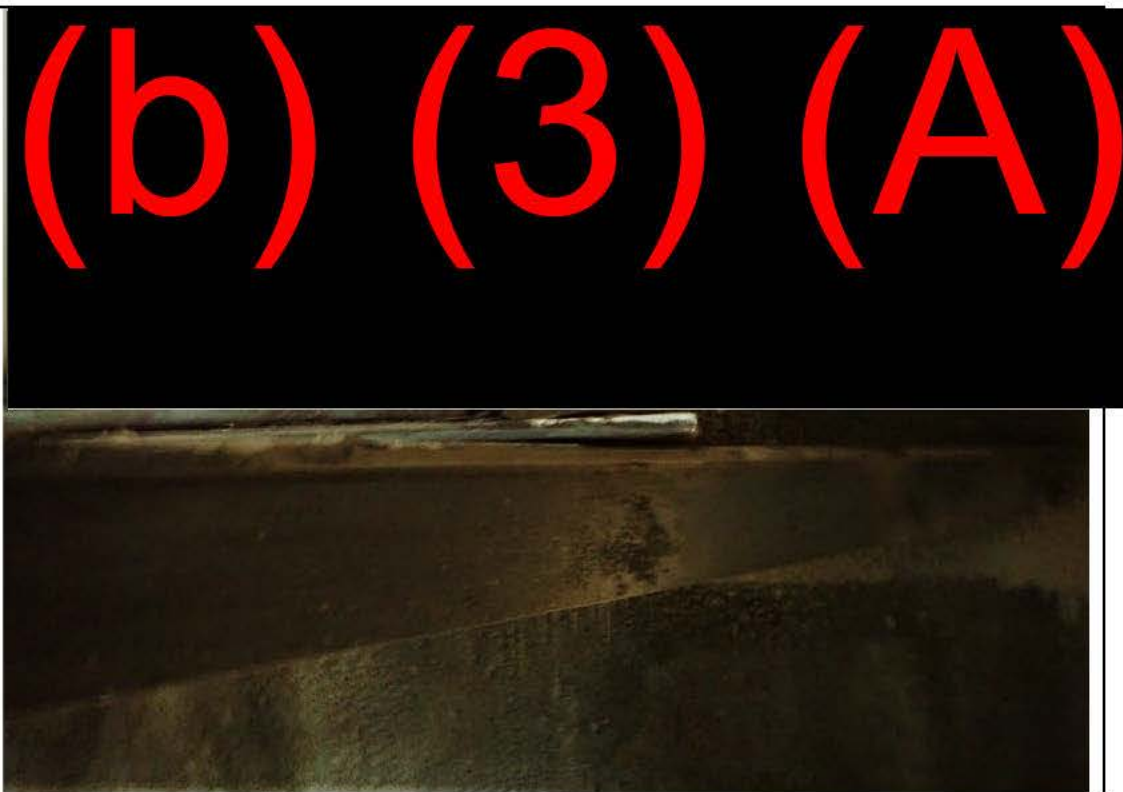


Photo No. 50	Time: 1433
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Blistering and flaking of XXXX pipe coating, near support XXXX	



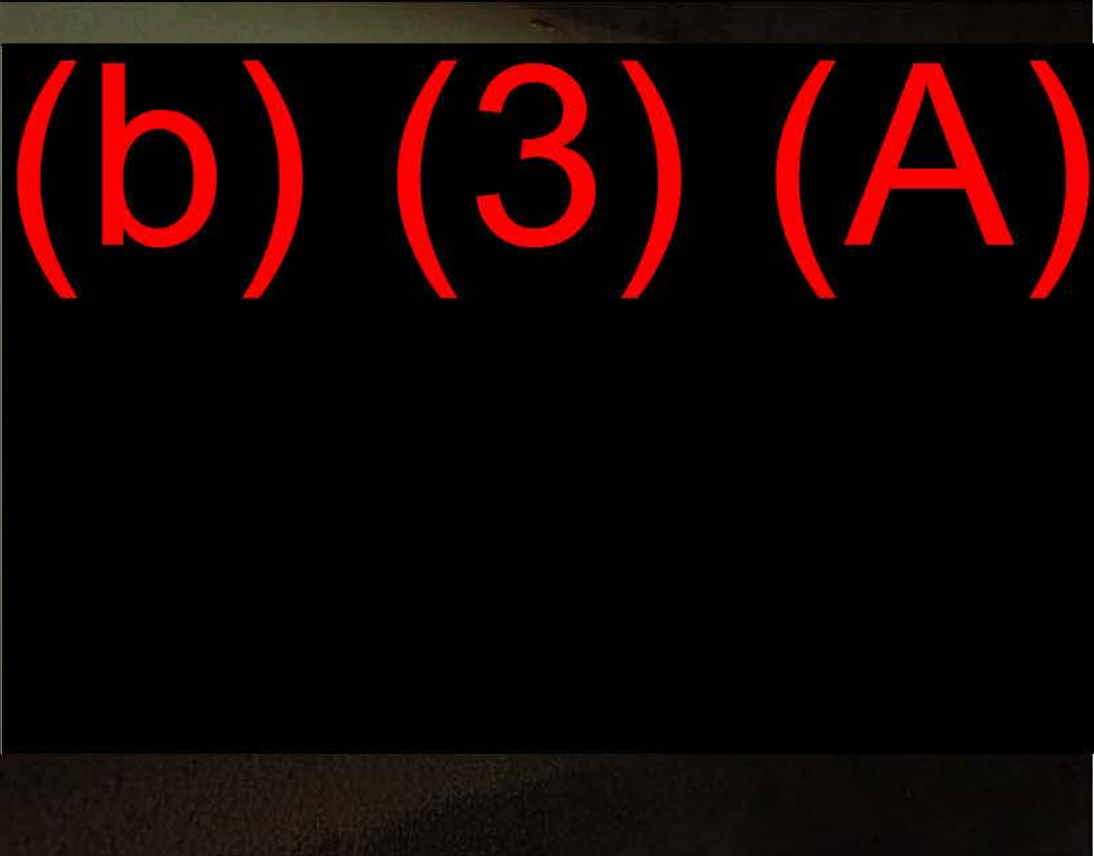
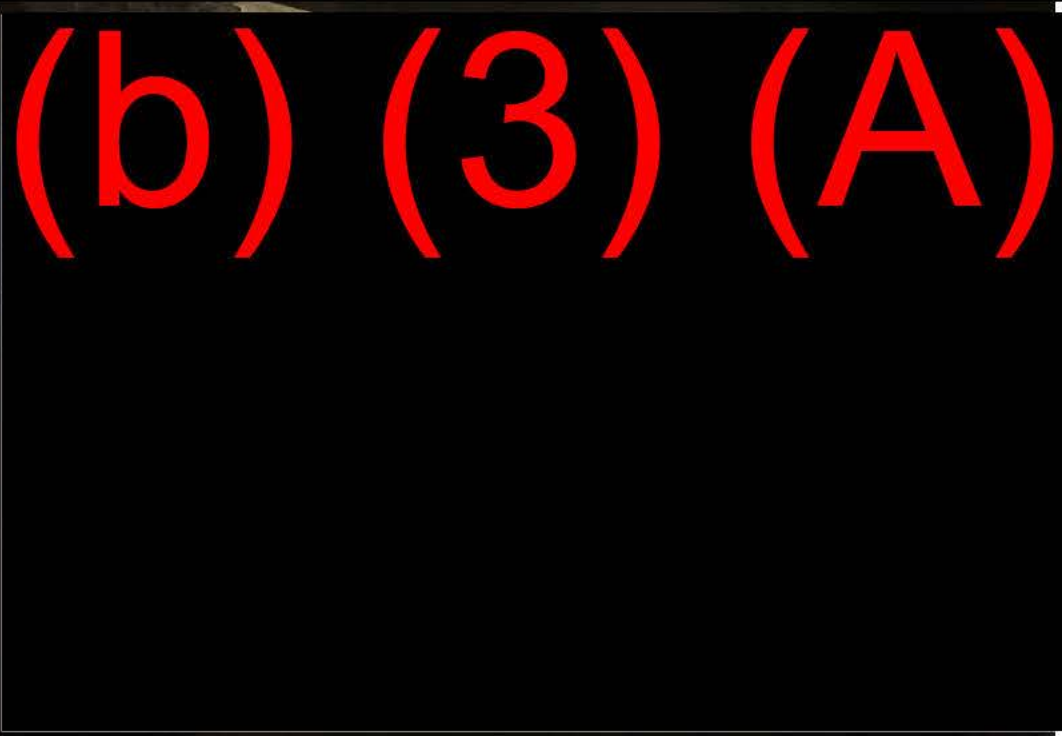
Photographer: WITUL		
Photo No. 51	Time: 1433	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Additional blistering of (b) (3) (A) pipe coating, near support (b) (3) (A)		

Photo No. 52	Time: 1434	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Blistering, flaking, and corrosion of (b) (3) (A) pipe coating and possibly pipe, just before support (b) (3) (A)		

Photographer: WITUL	
Photo No. 53	Time: 1436
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Flaking/coating failure and touch-up on (b) (3) (A) pipe.	

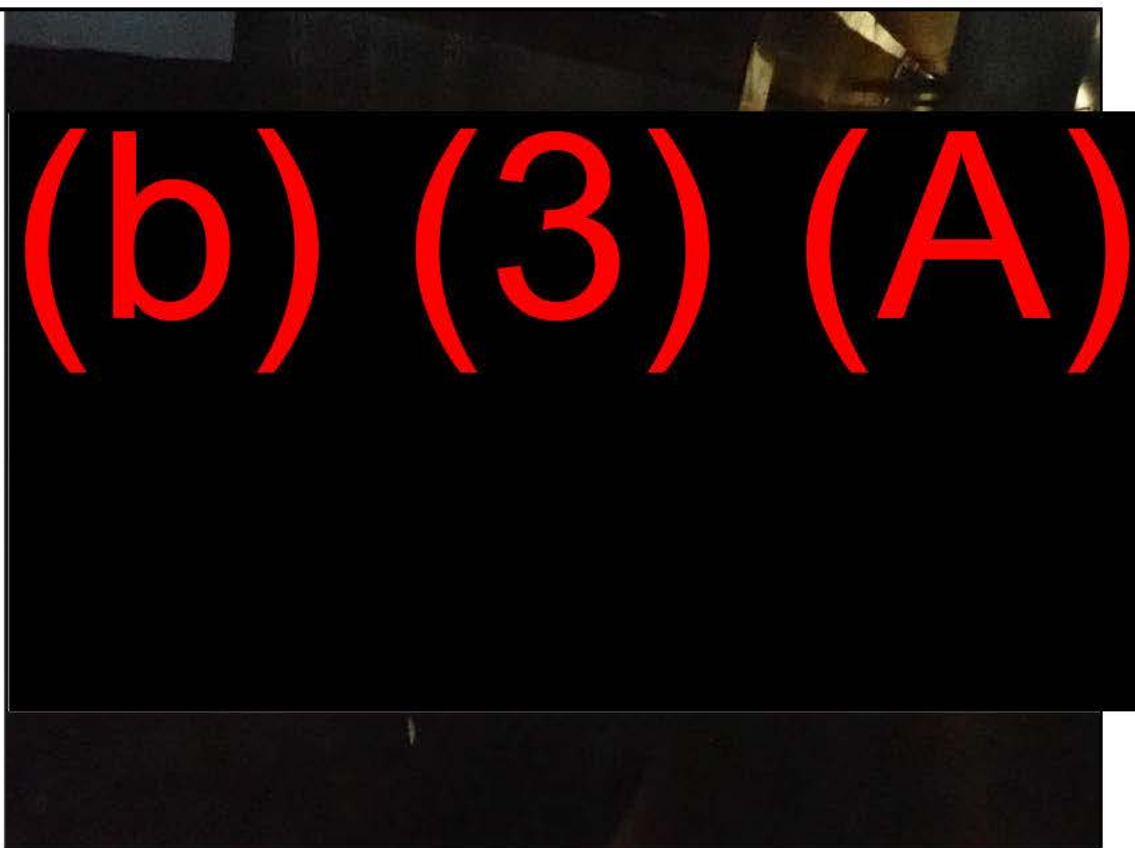
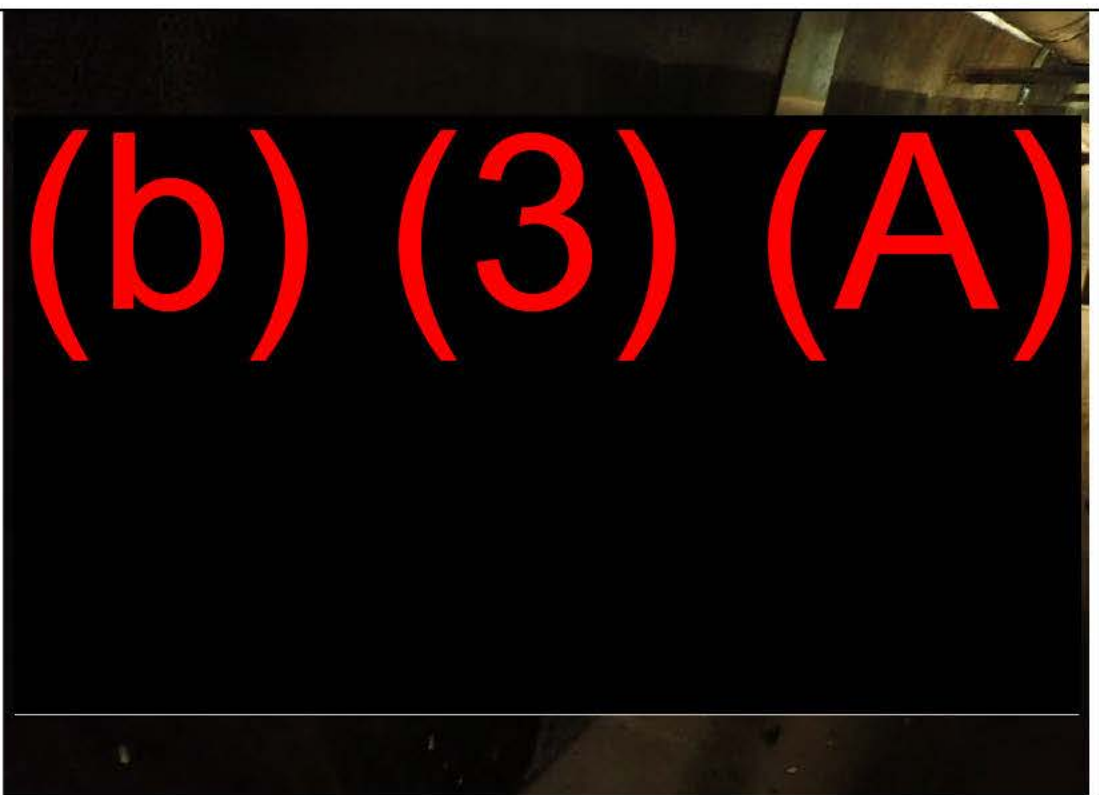


Photo No. 54	Time: 1437
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Flaking/coating failure and touch-up on (b) (3) (A) pipe, additional view.	



Photographer: WITUL	
Photo No. 55	Time: 1446
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Depressions in (b) (3) (A) pipe, near support (b) (3) (A)	

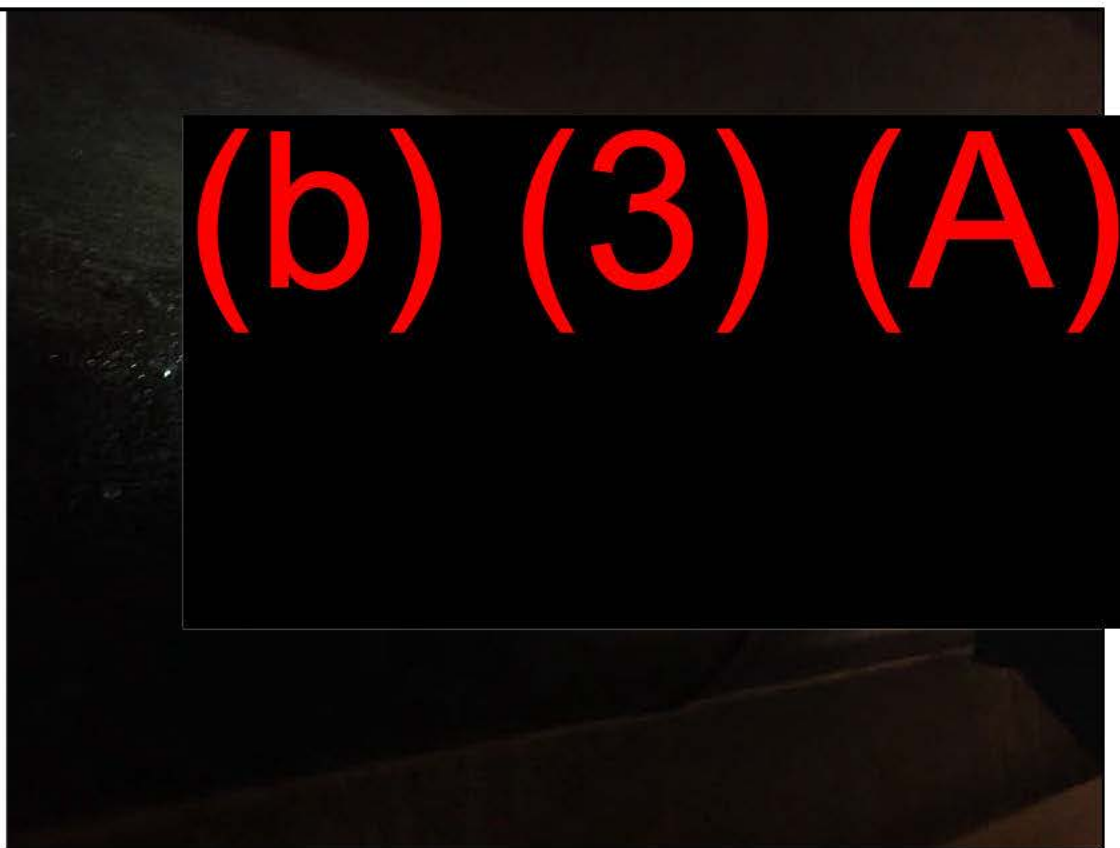
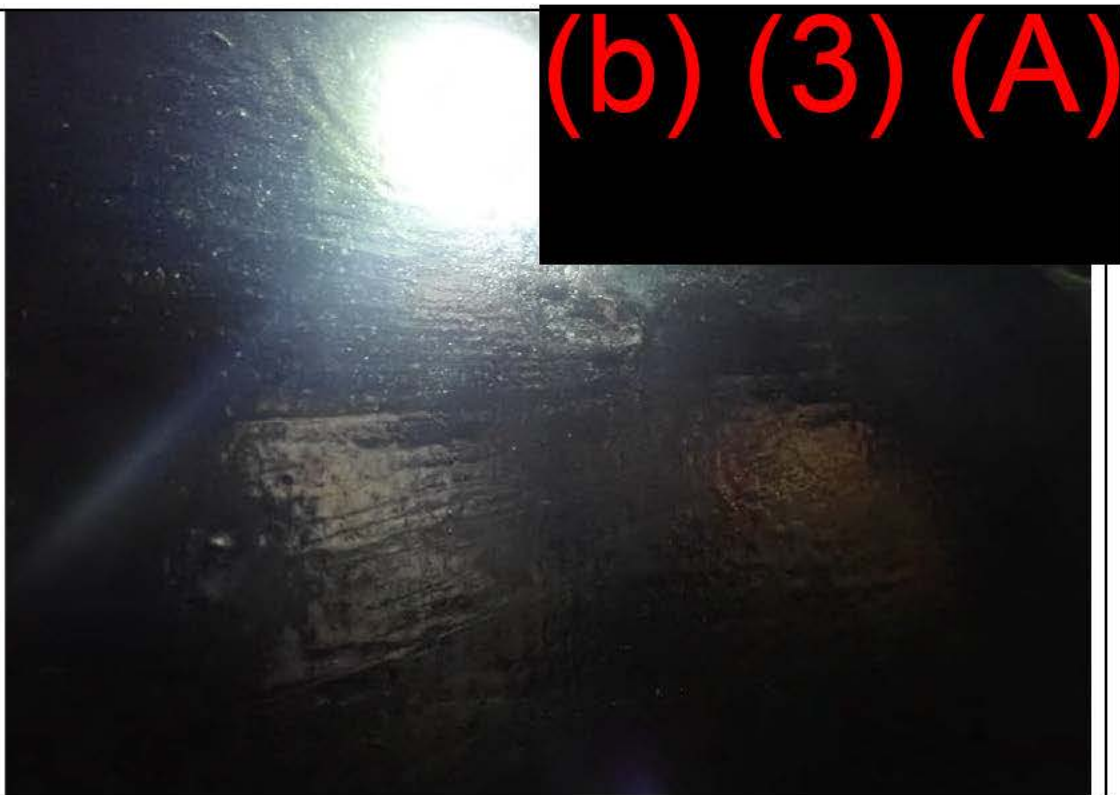


Photo No. 56	Time: 1446
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Depressions in (b) (3) (A) pipe, near support (b) (3) (A) additional view.	



Photographer: WITUL	
Photo No. 57	Time: 1448
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents along (b) (3) (A) pipe.	

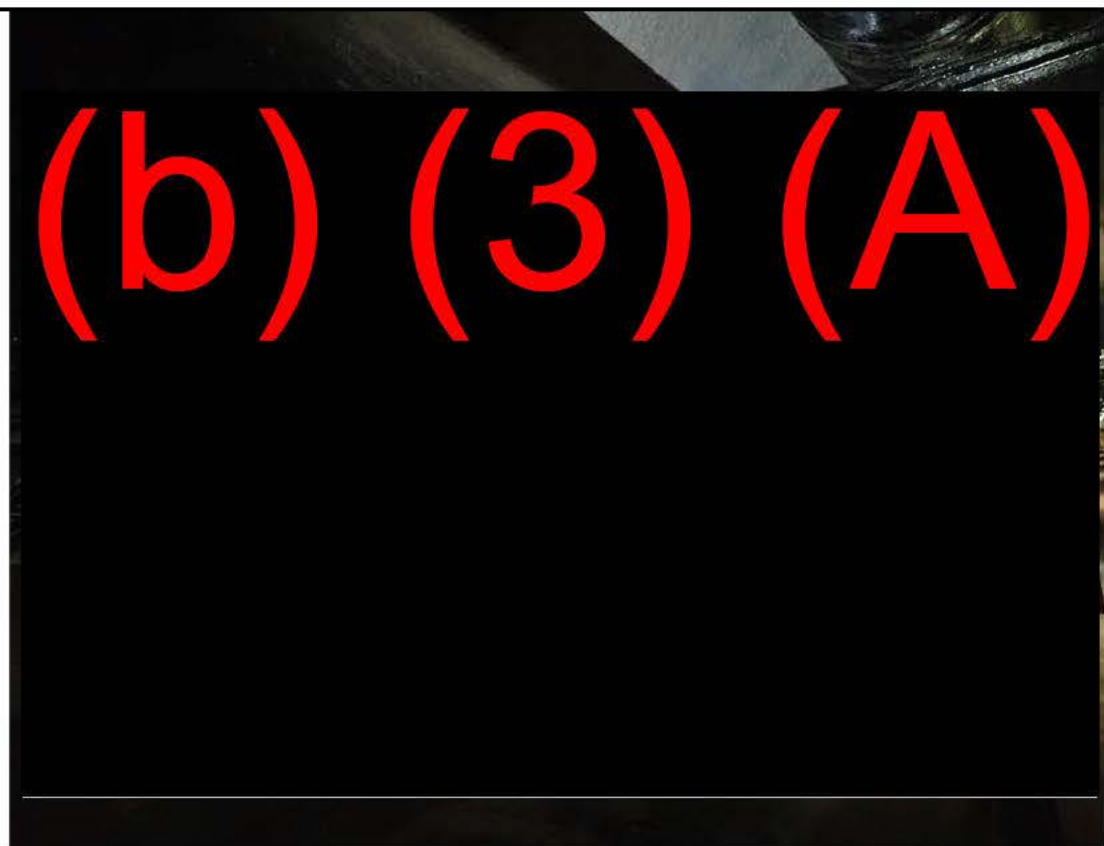
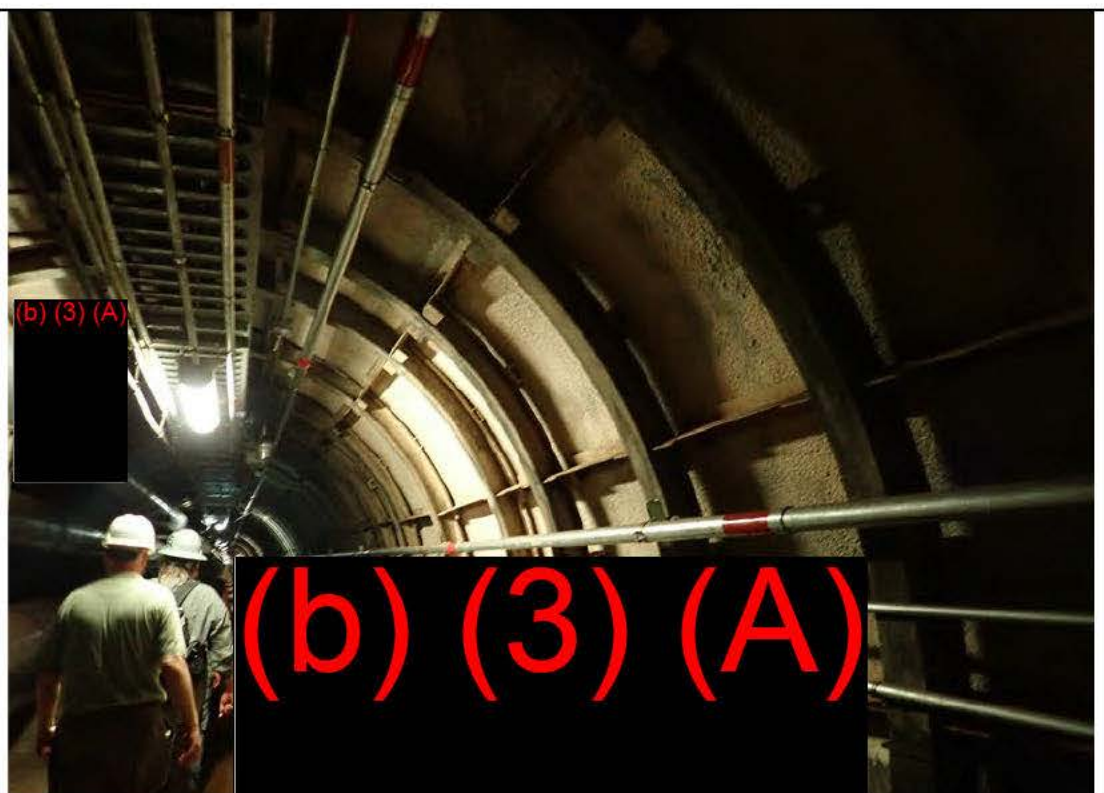
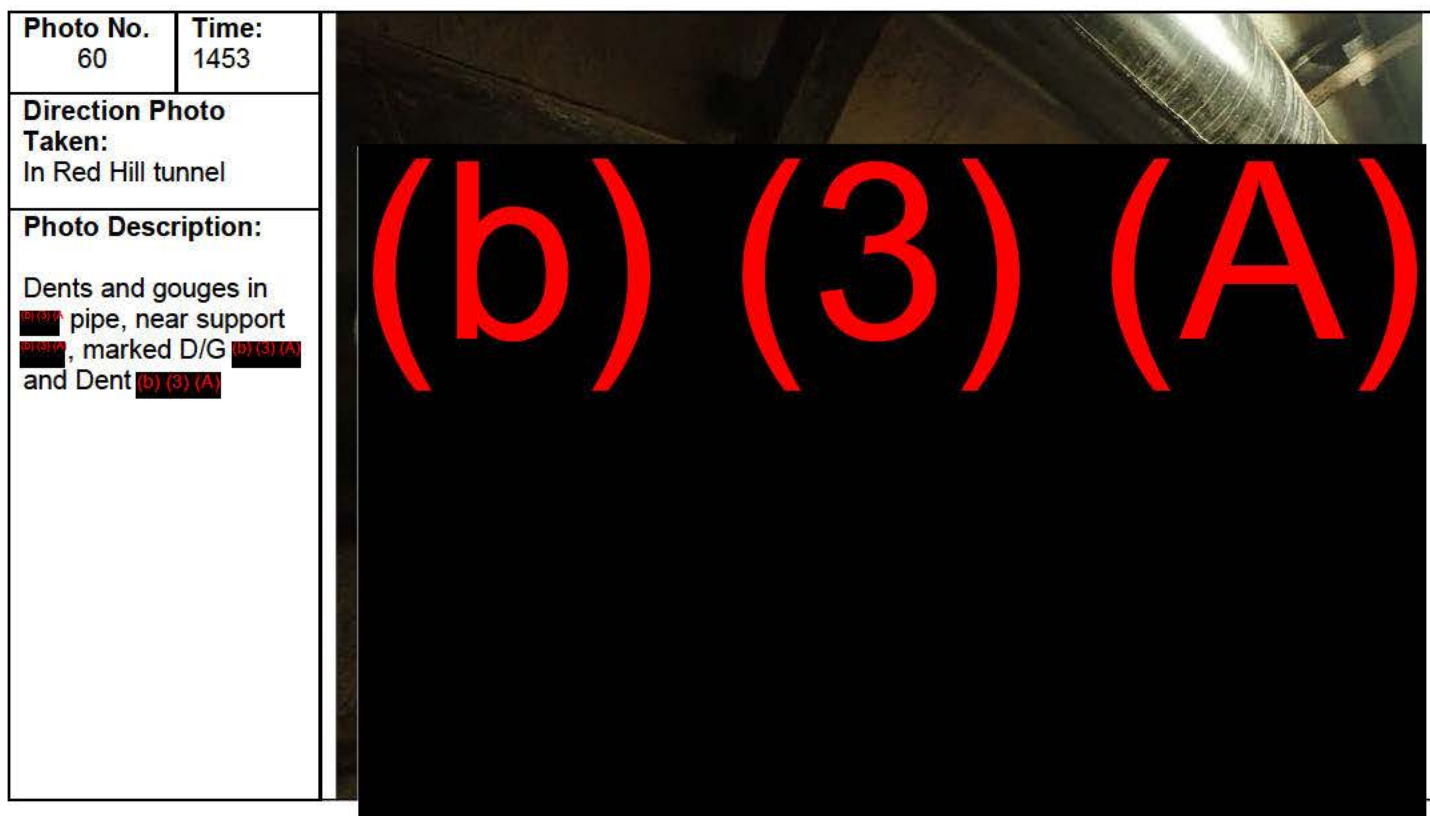
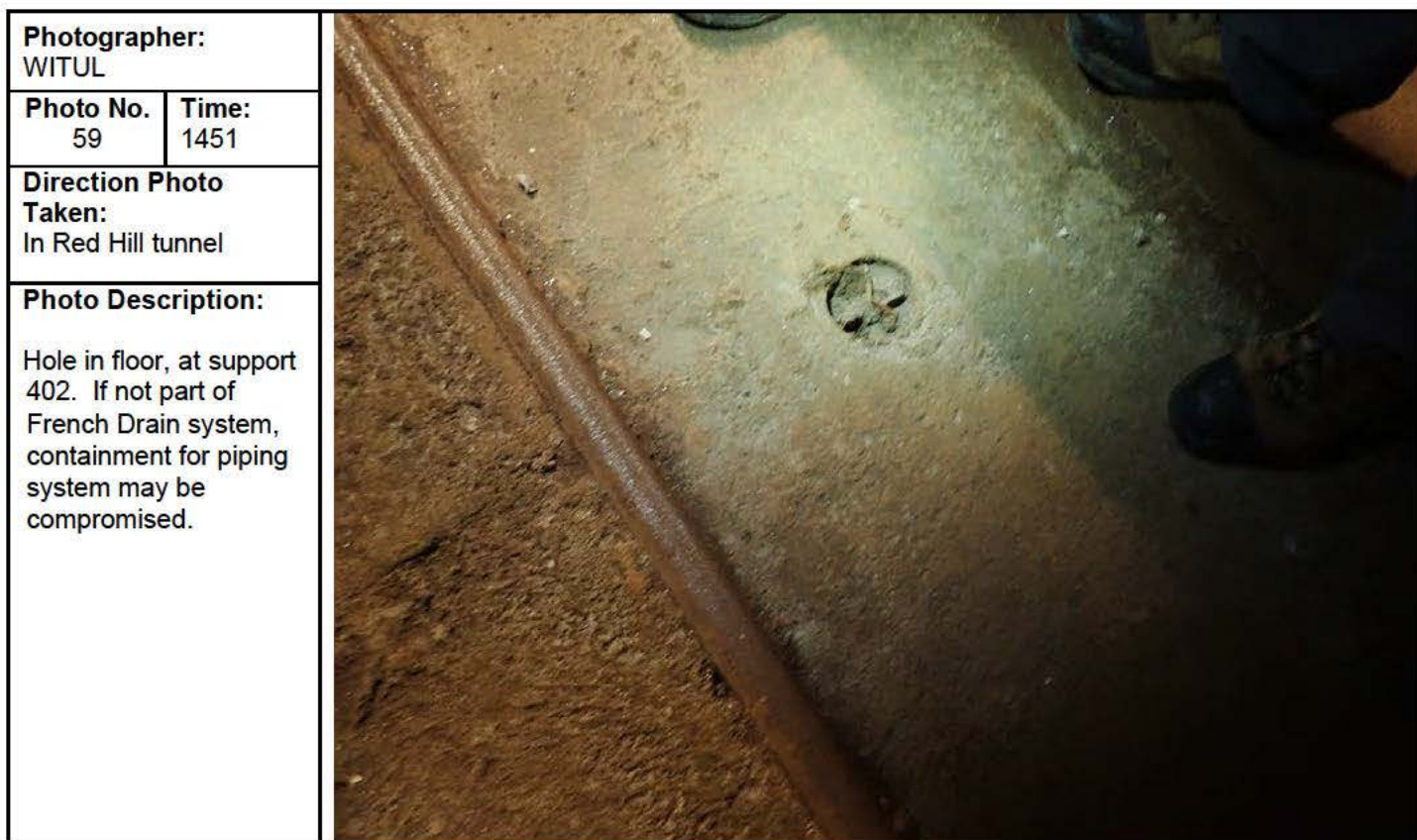


Photo No. 58	Time: 1449
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Tunnel reinforcing, older infrastructure.	





Photographer: WITUL	
Photo No. 61	Time: 1453
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents and gouges in [REDACTED] pipe, marked - Dent [REDACTED] Dent [REDACTED] Dent/Gouge [REDACTED]	

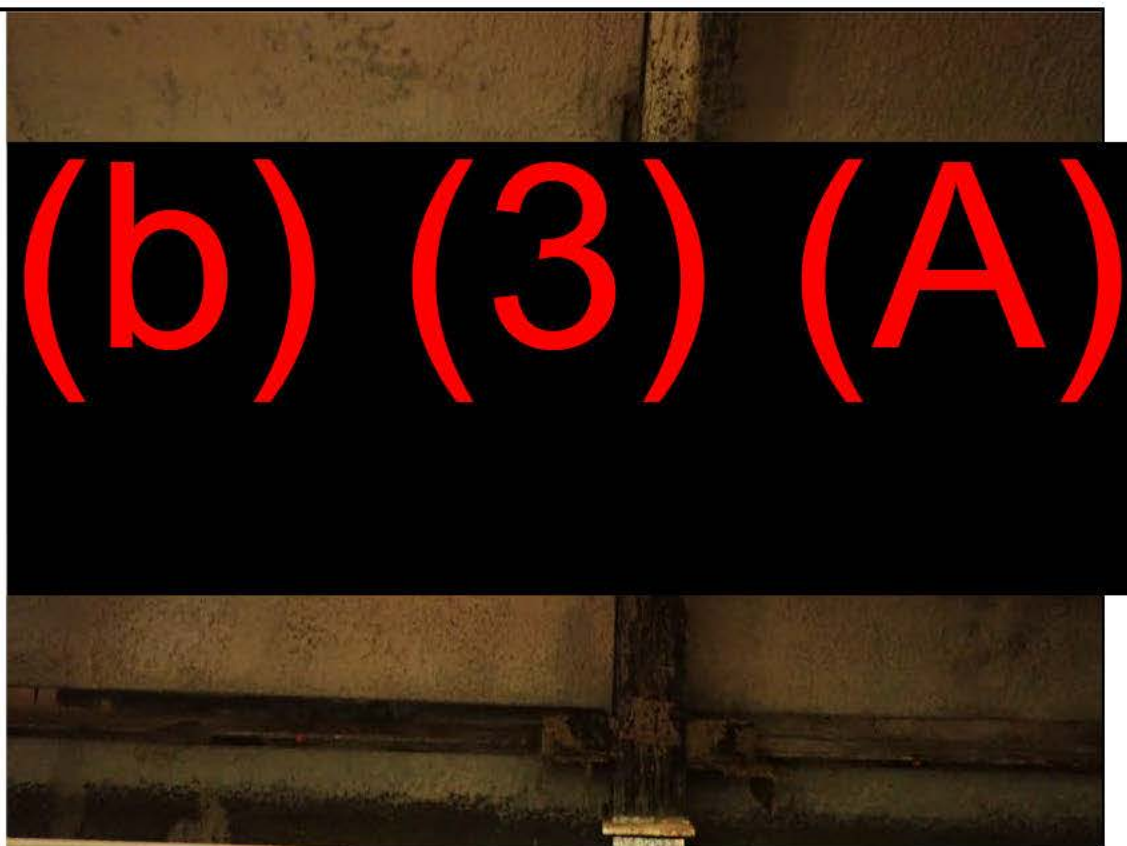
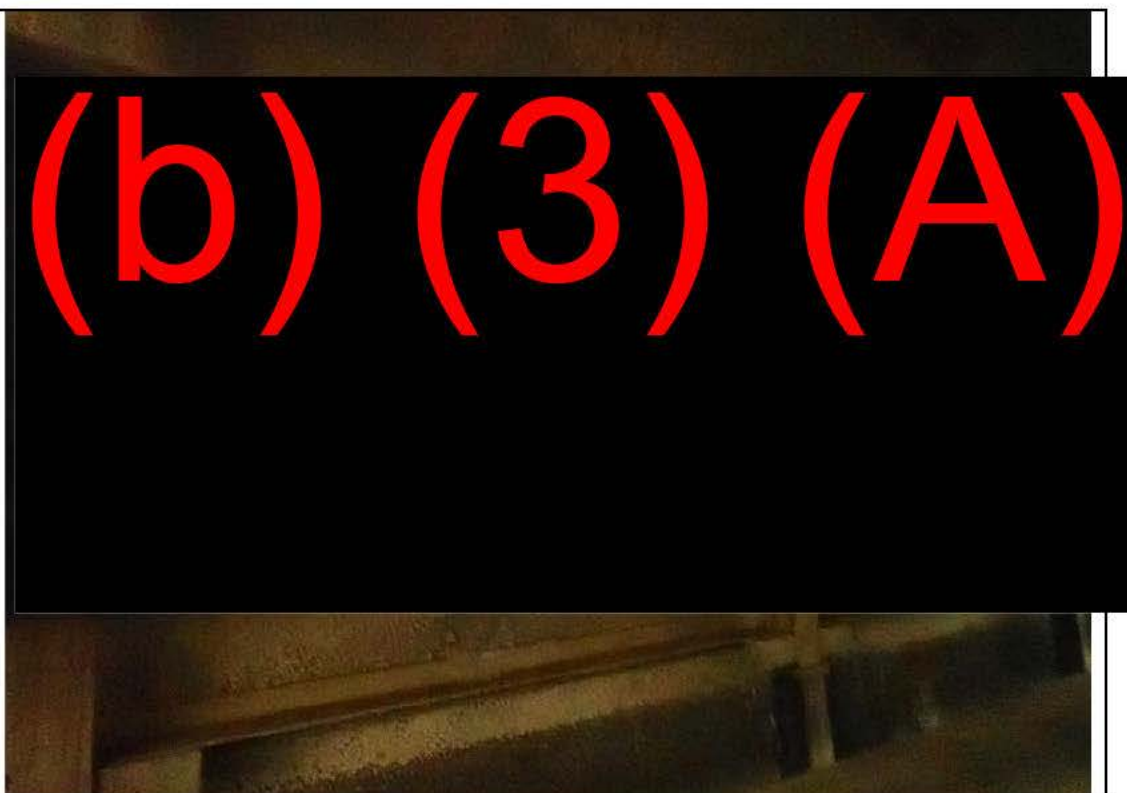


Photo No. 62	Time: 1456
Direction Photo Taken: In Red Hill tunnel	
Photo Description: [REDACTED] Dent in [REDACTED] pipe, near support [REDACTED]	



Photographer: WITUL	
Photo No. 63	Time: 1458
Direction Photo Taken: In Red Hill tunnel	
Photo Description: <div>(b) (3) (A) dent marked on pipe, near support</div> <div>(b) (3) (A)</div>	

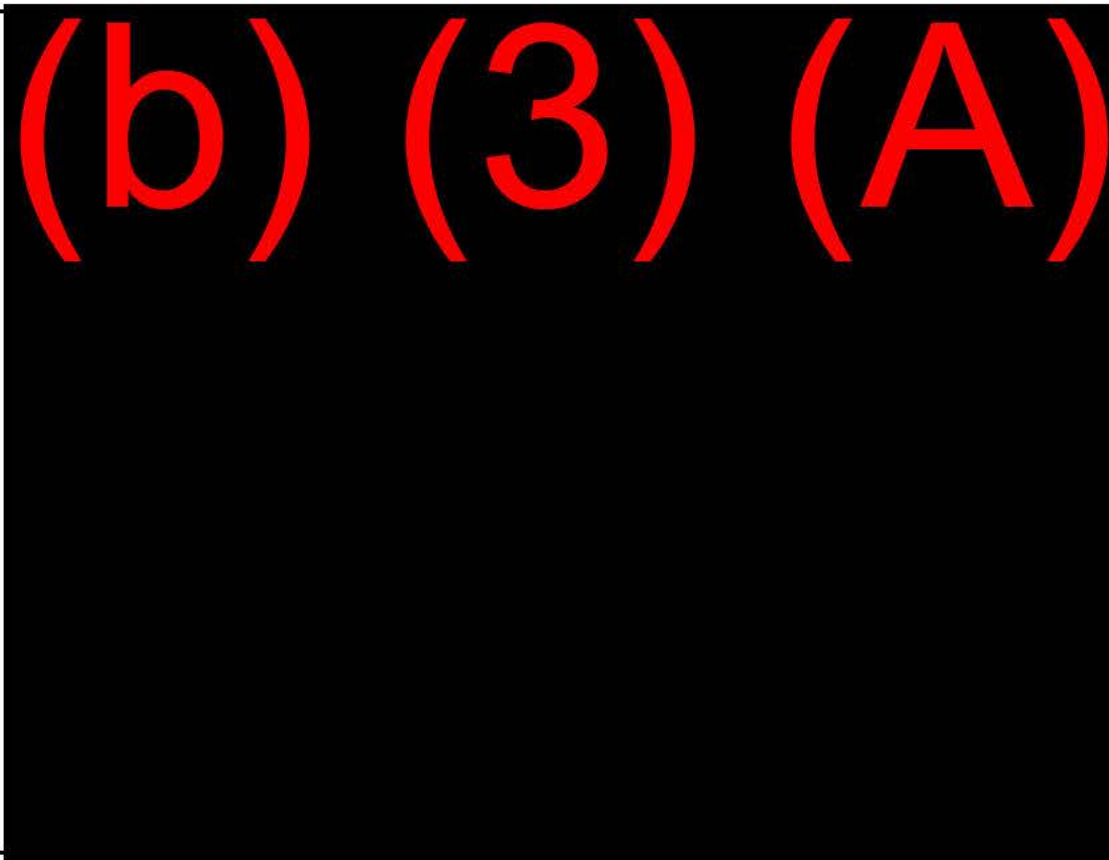
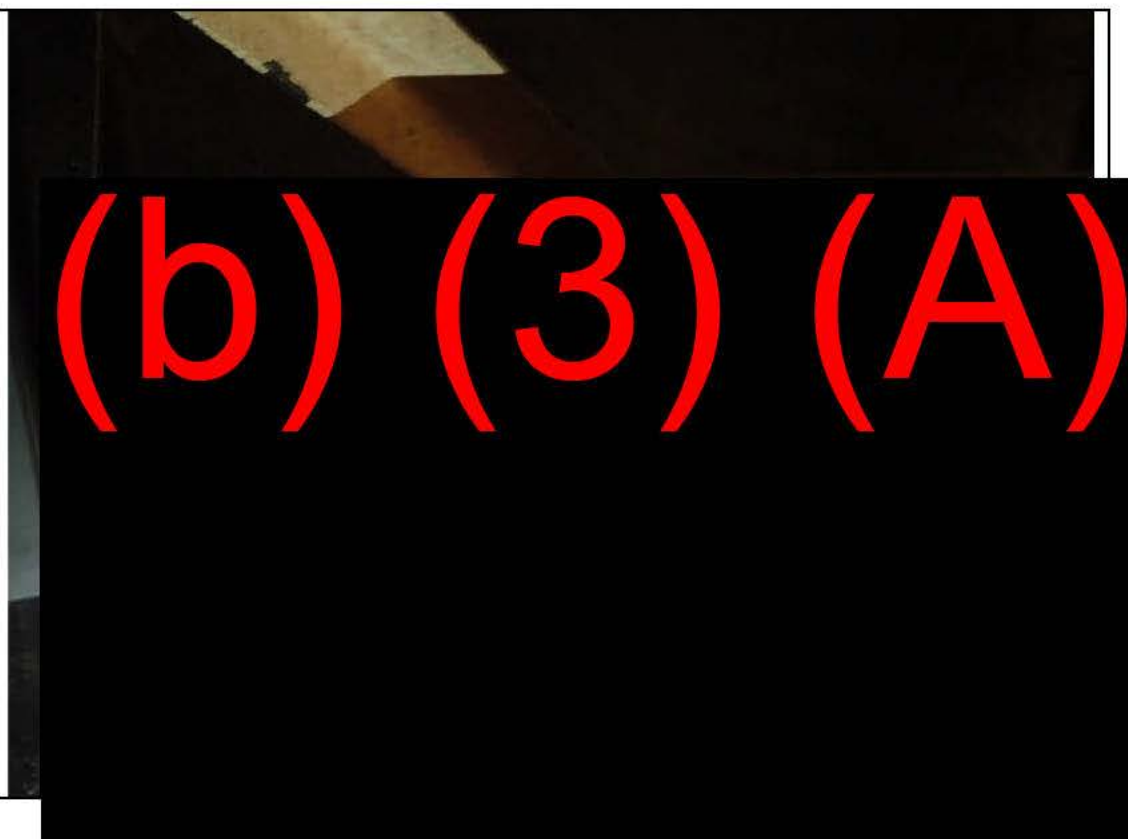


Photo No. 64	Time: 1459
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents in pipe, marked <div>(b) (3) (A)</div> before support	



Photographer: WITUL	
Photo No. 65	Time: 1459
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents in pipe, marked (b) (3) (A) before support - additional image.	

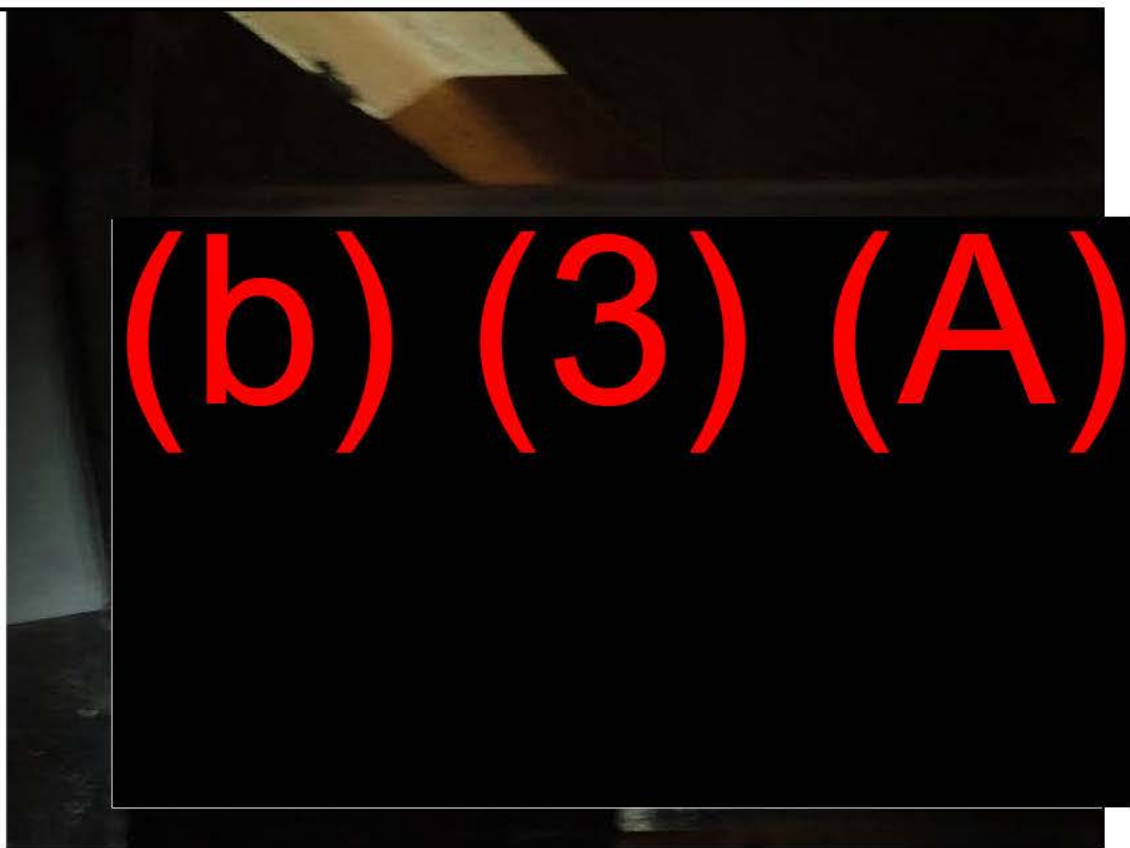
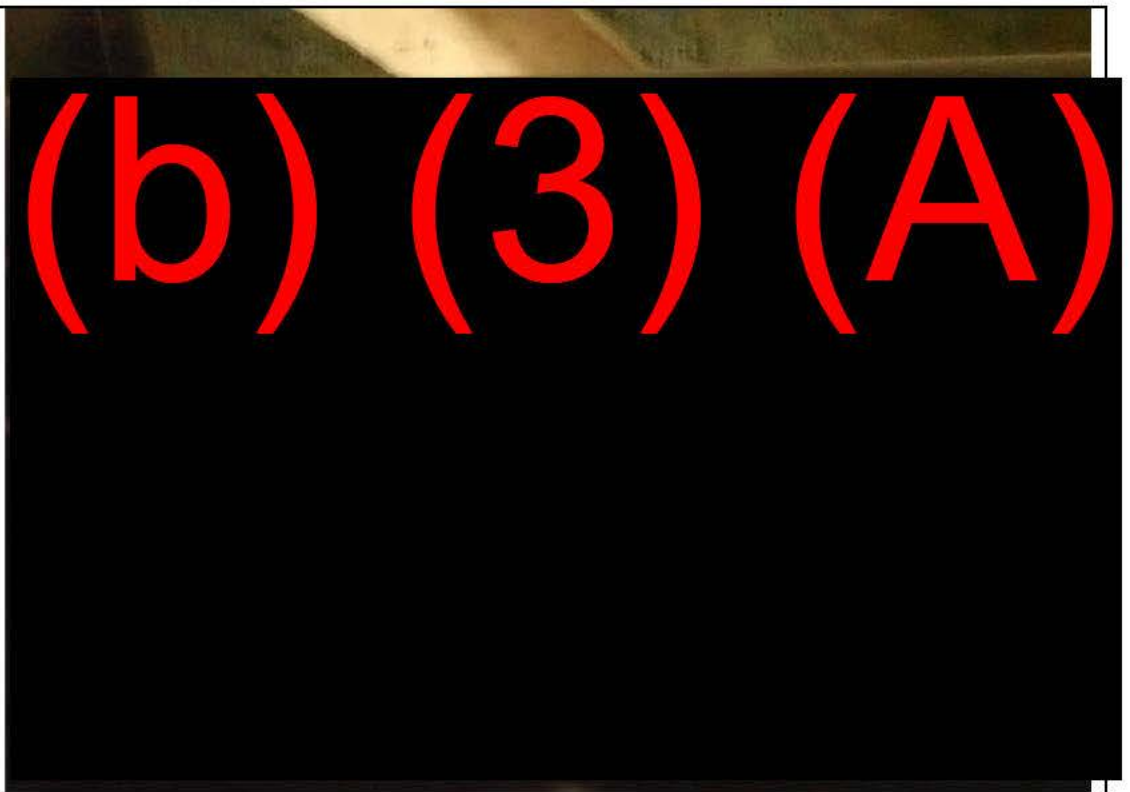
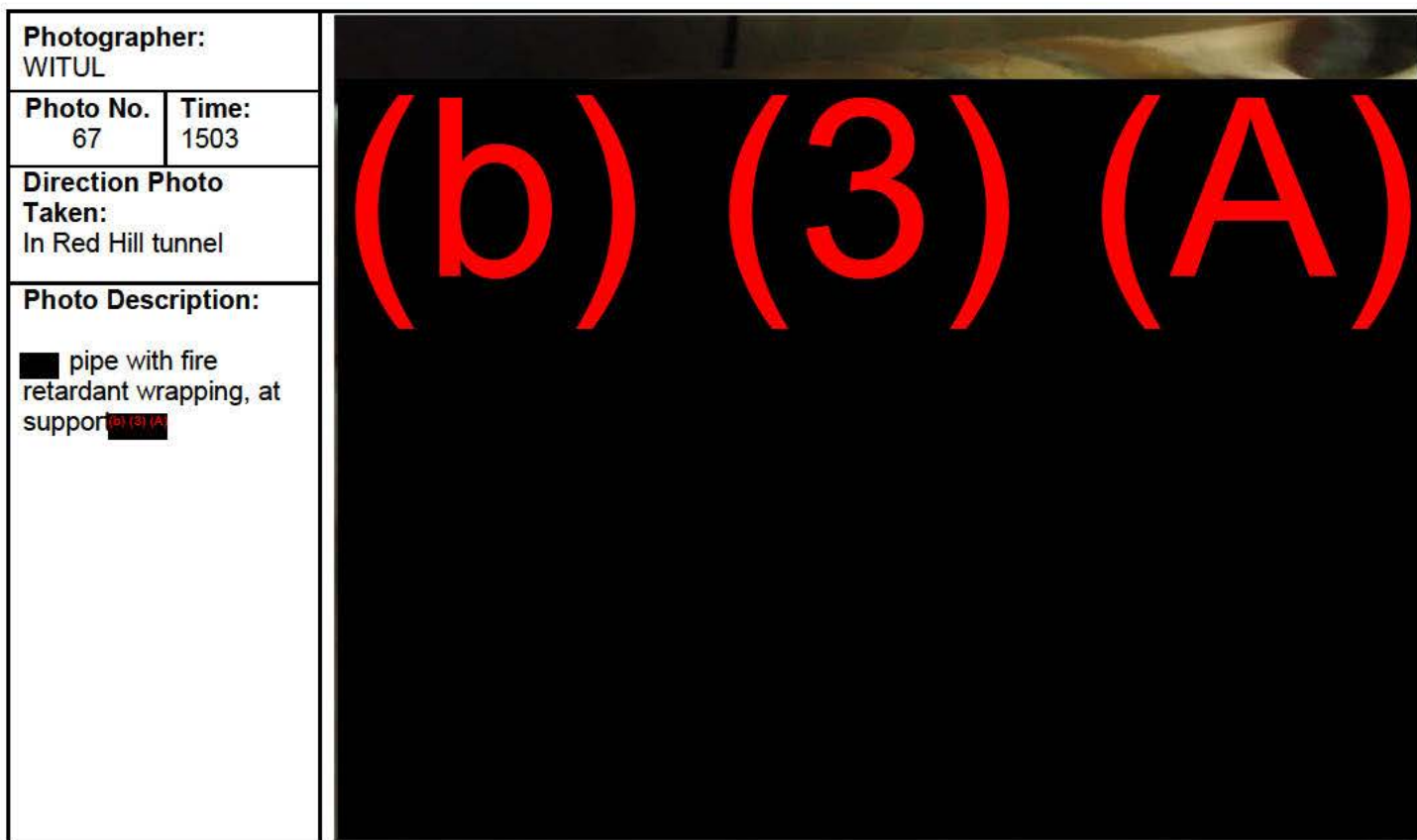


Photo No. 66	Time: 1459
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dents in pipe, marked (b) (3) (A) before support - additional image.	







Photographer: WITUL	
Photo No. 71	Time: 1509
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dent in piping, marked (b) (3) (A) between supports (b) (3) (A)	

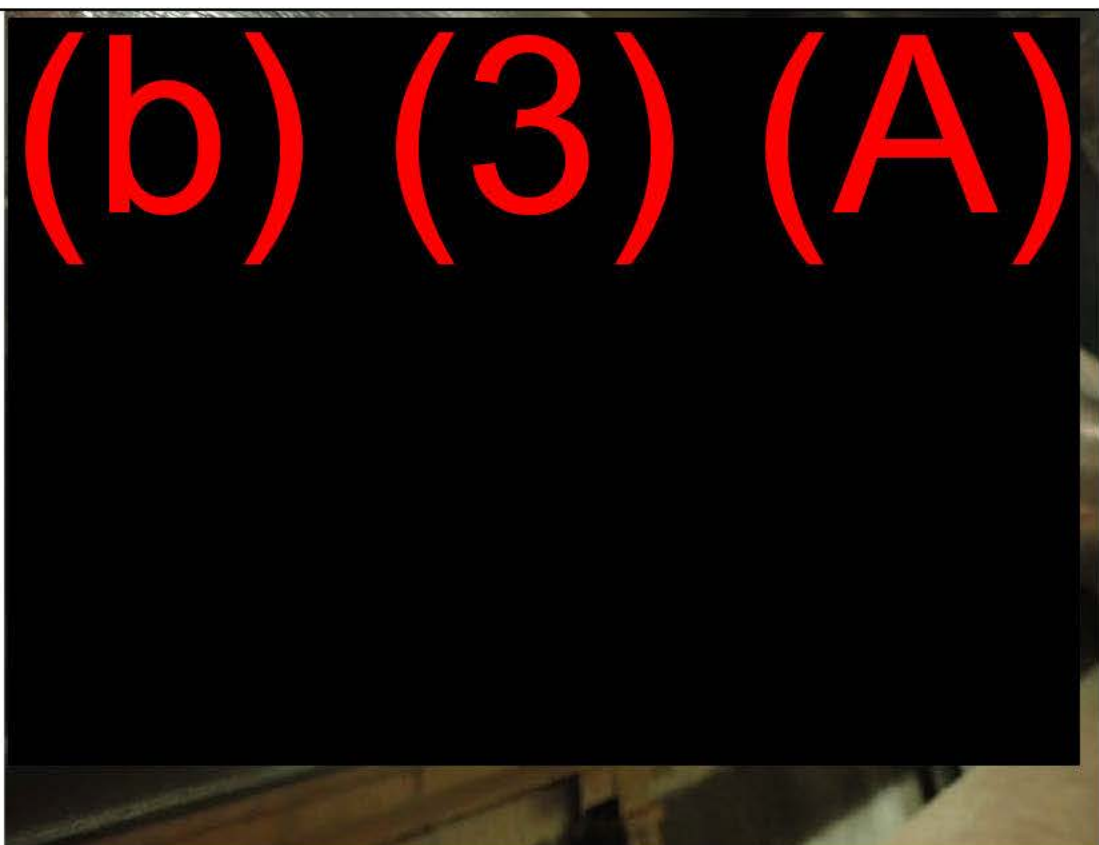


Photo No. 72	Time: 1512
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Grate over drain system, before support 509.	



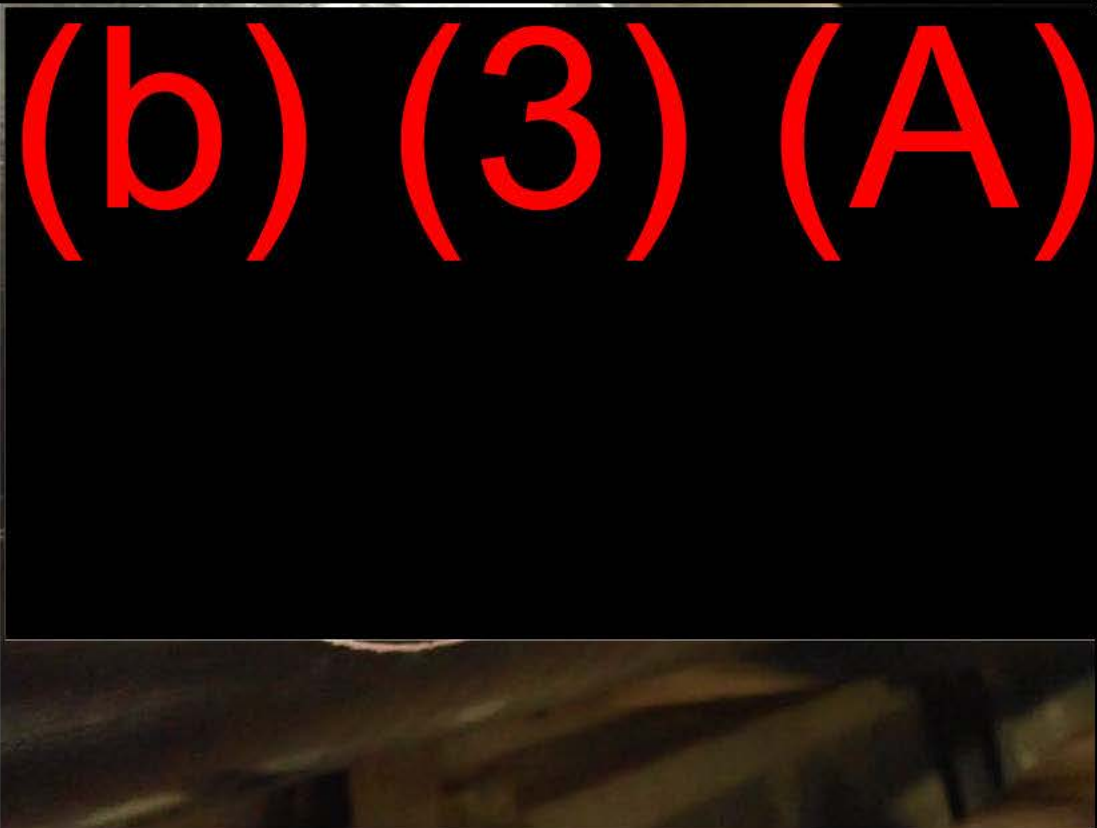
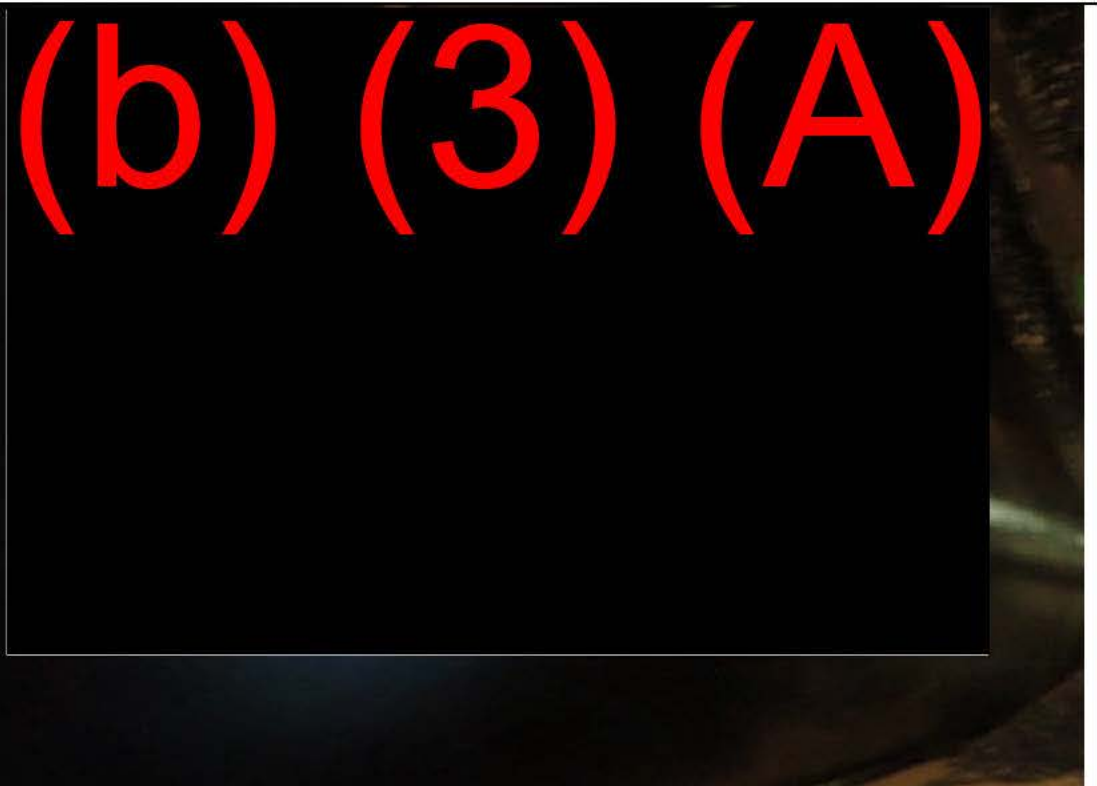
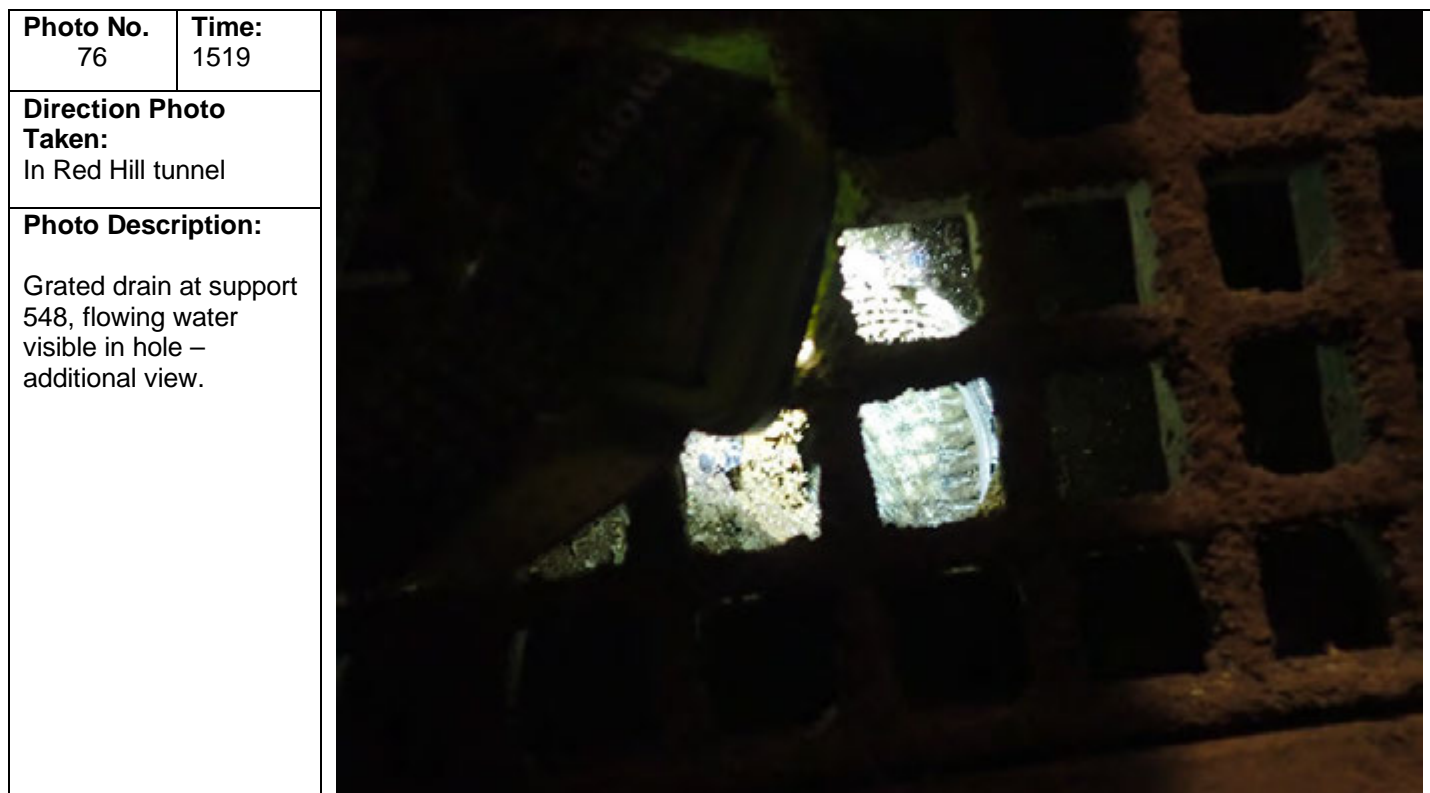
Photographer: WITUL		
Photo No. 73	Time: 1514	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Dent in (b) (3) (A) pipe at support (b) (3) (A) marked (b) (3) (A)		

Photo No. 74	Time: 1515	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Dent in pipe at support (b) (3) (A)		



Photographer: WITUL	
Photo No. 77	Time: 1520
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Grated drain at support 548, flowing water visible in hole – additional view.	



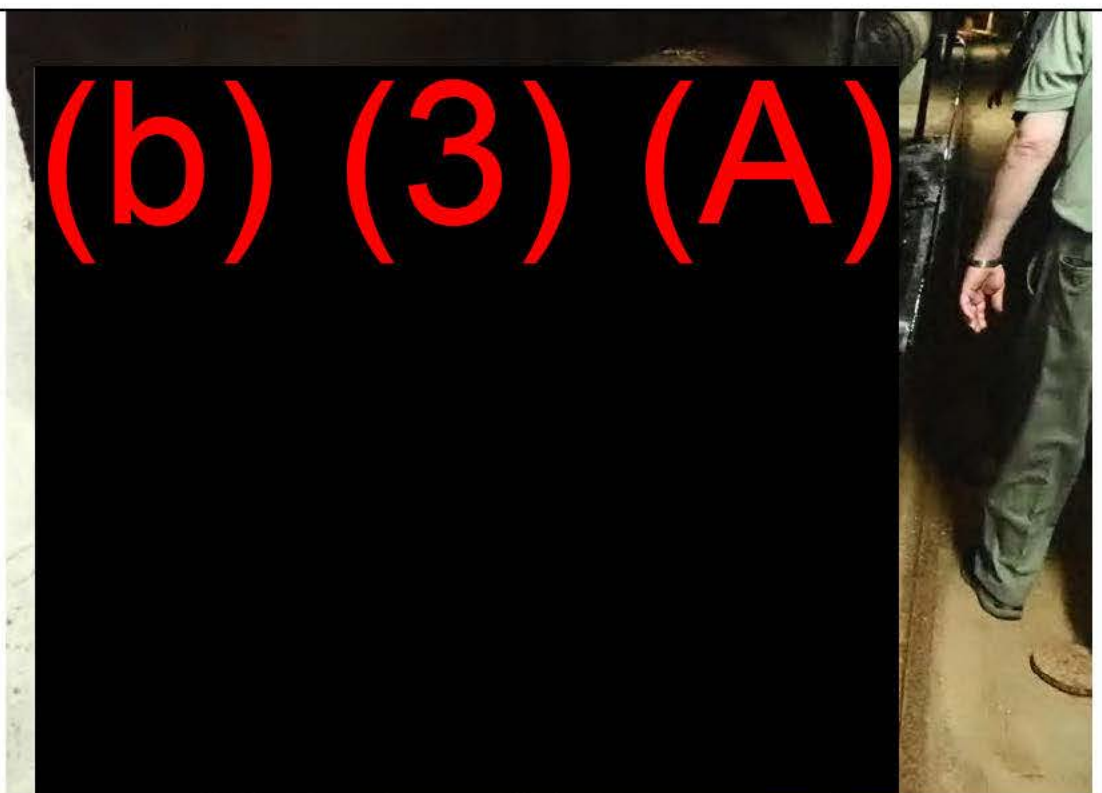
Photo No. 78	Time: 1521
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Flooding in tunnel, starting near support 550; reportedly due to blockage in French Drain system.	

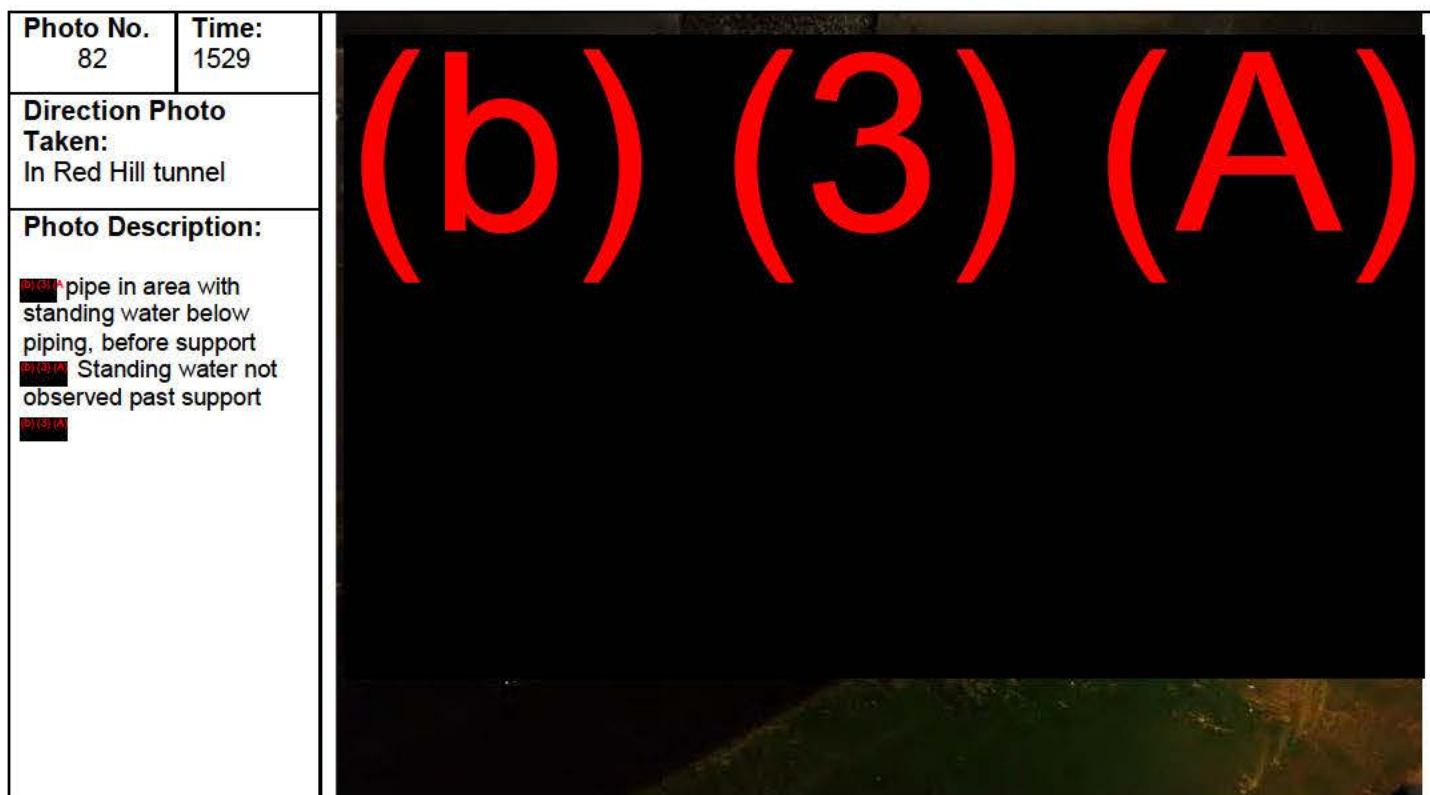
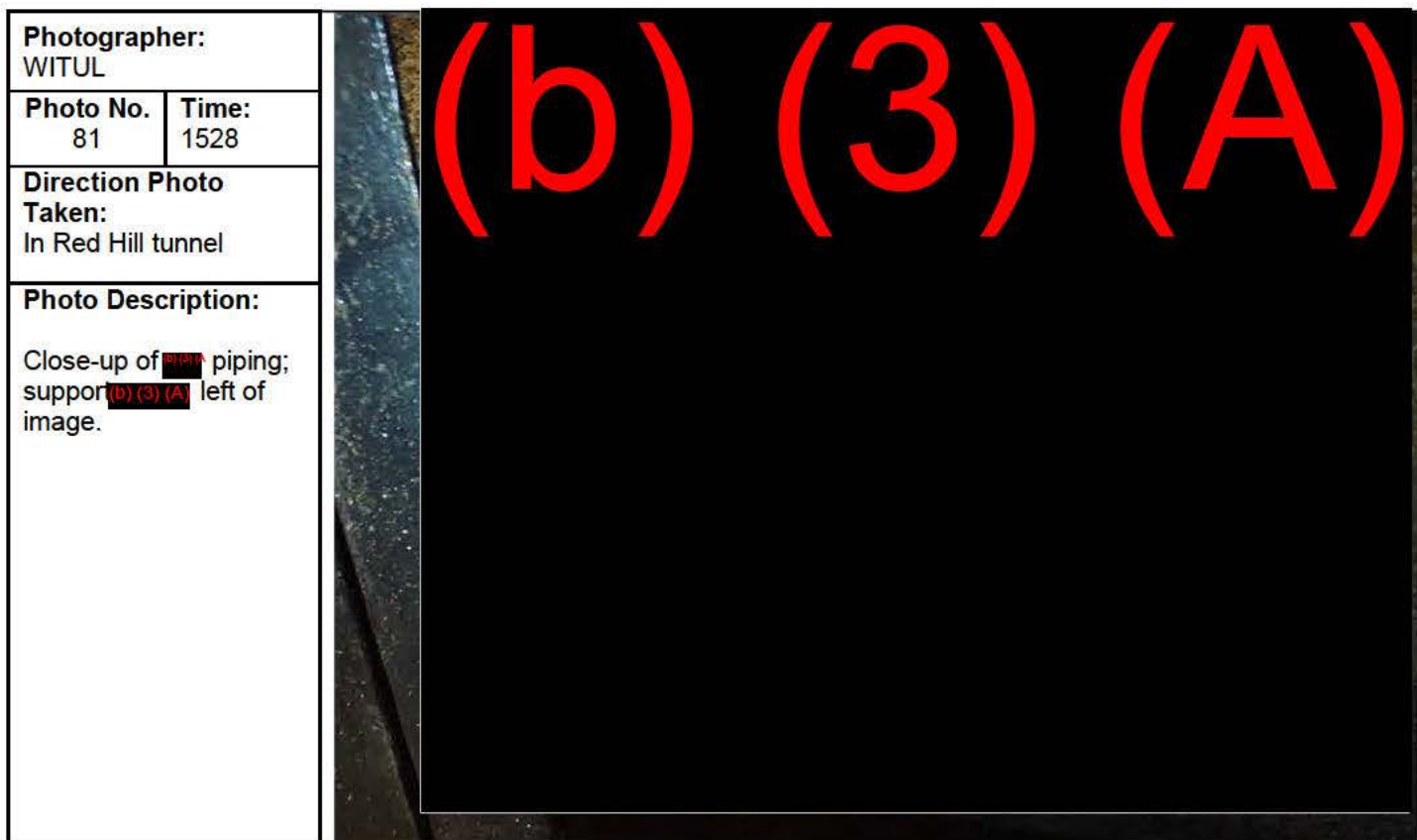


Photographer: WITUL	
Photo No. 79	Time: 1524
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Water returning (from flooded area) to drain under grates, near support 567.	



Photo No. 80	Time: 1527
Direction Photo Taken: In Red Hill tunnel	
Photo Description: [REDACTED] piping in tunnel area with standing water alongside tracks, at support [REDACTED]	





Photographer: WITUL	
Photo No. 83	Time: 1532
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dent in [REDACTED] pipe at support [REDACTED] marked Dent [REDACTED] [REDACTED] [REDACTED]	

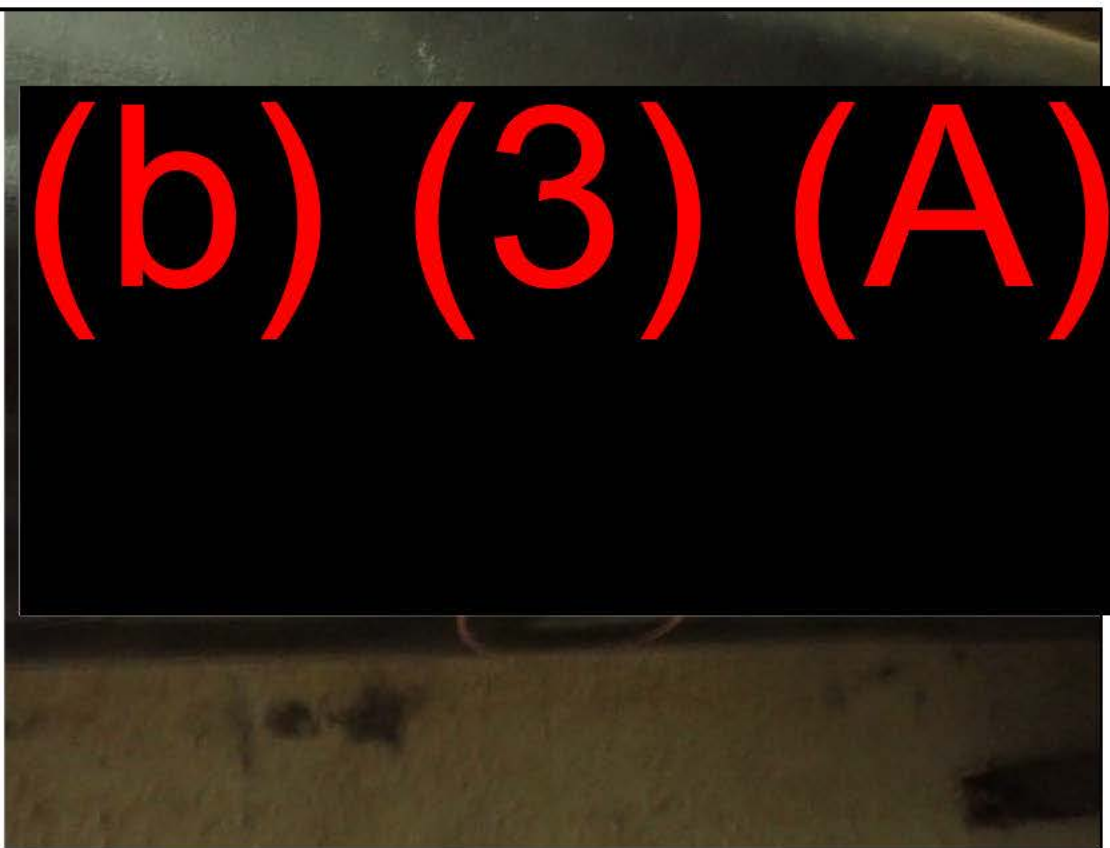
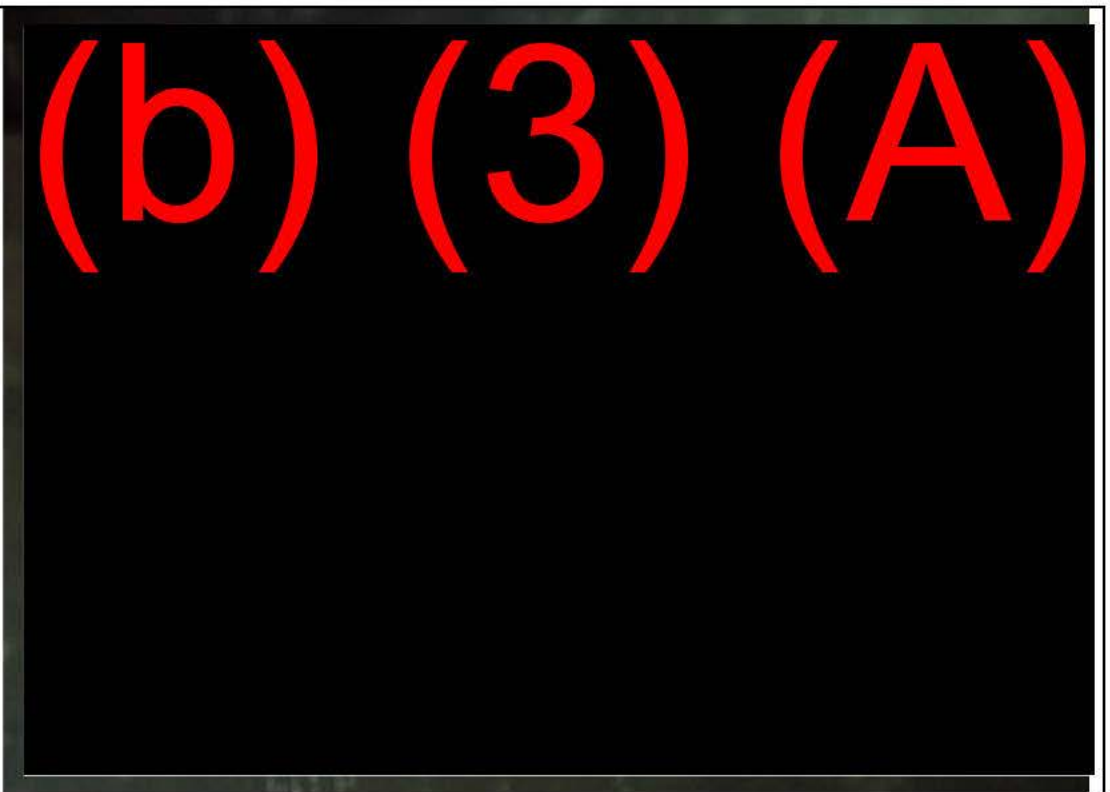


Photo No. 84	Time: 1533
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dent in [REDACTED] pipe at support [REDACTED] marked Dent [REDACTED] [REDACTED] [REDACTED]	



Photographer: WITUL	
Photo No. 85	Time: 1533
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Dent/gouging in (b) (3) (A) pipe, at support (b) (3) (A) Marking unclear, but area is circled in contrasting color and marked with asterisk.	

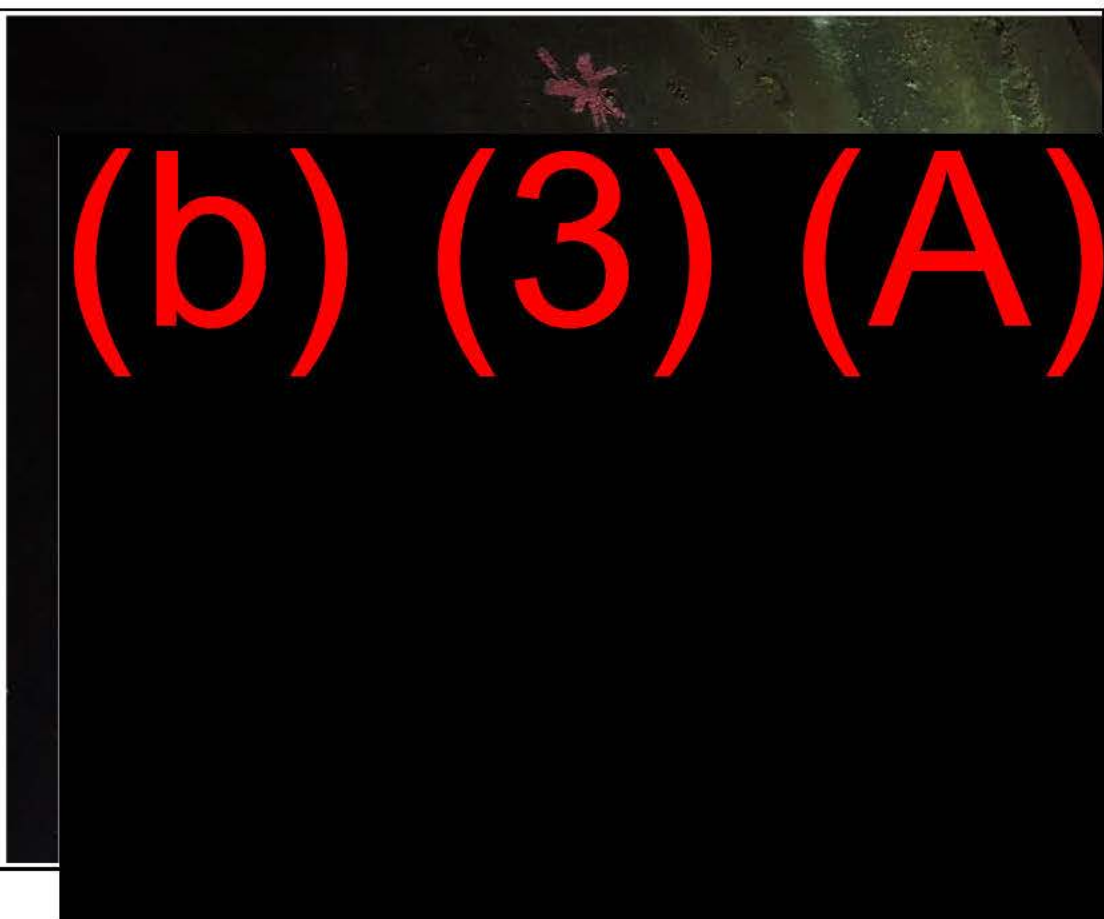
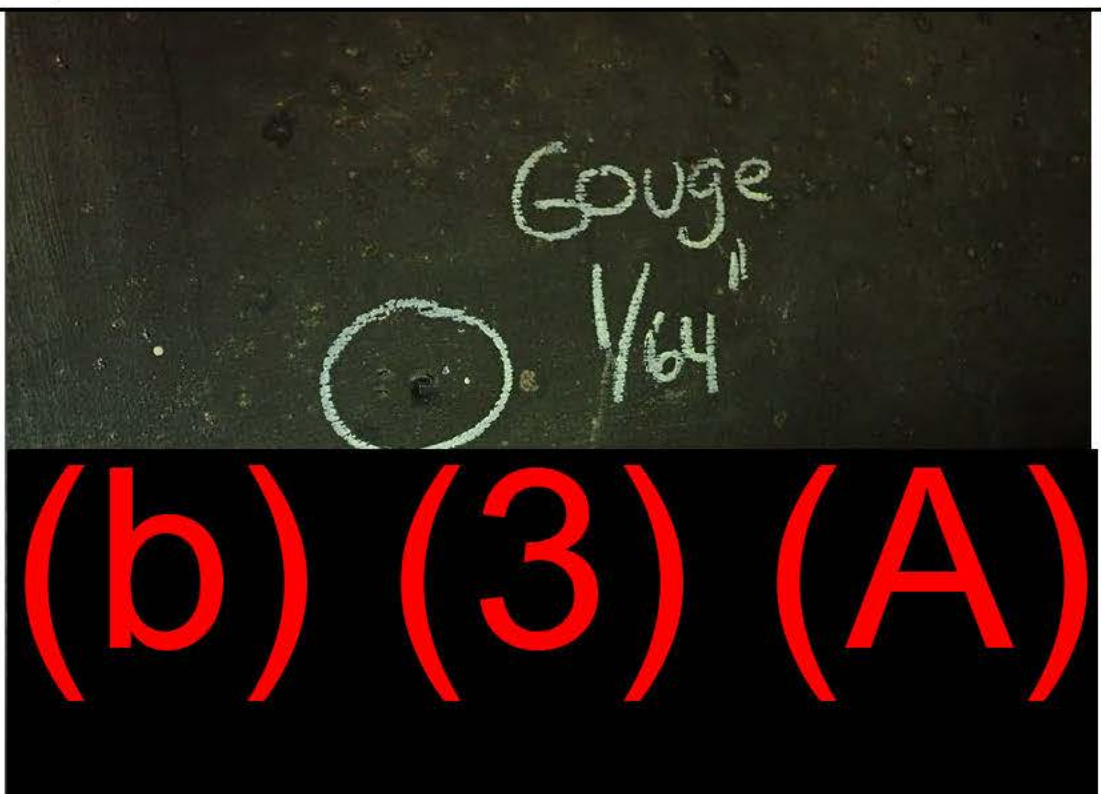
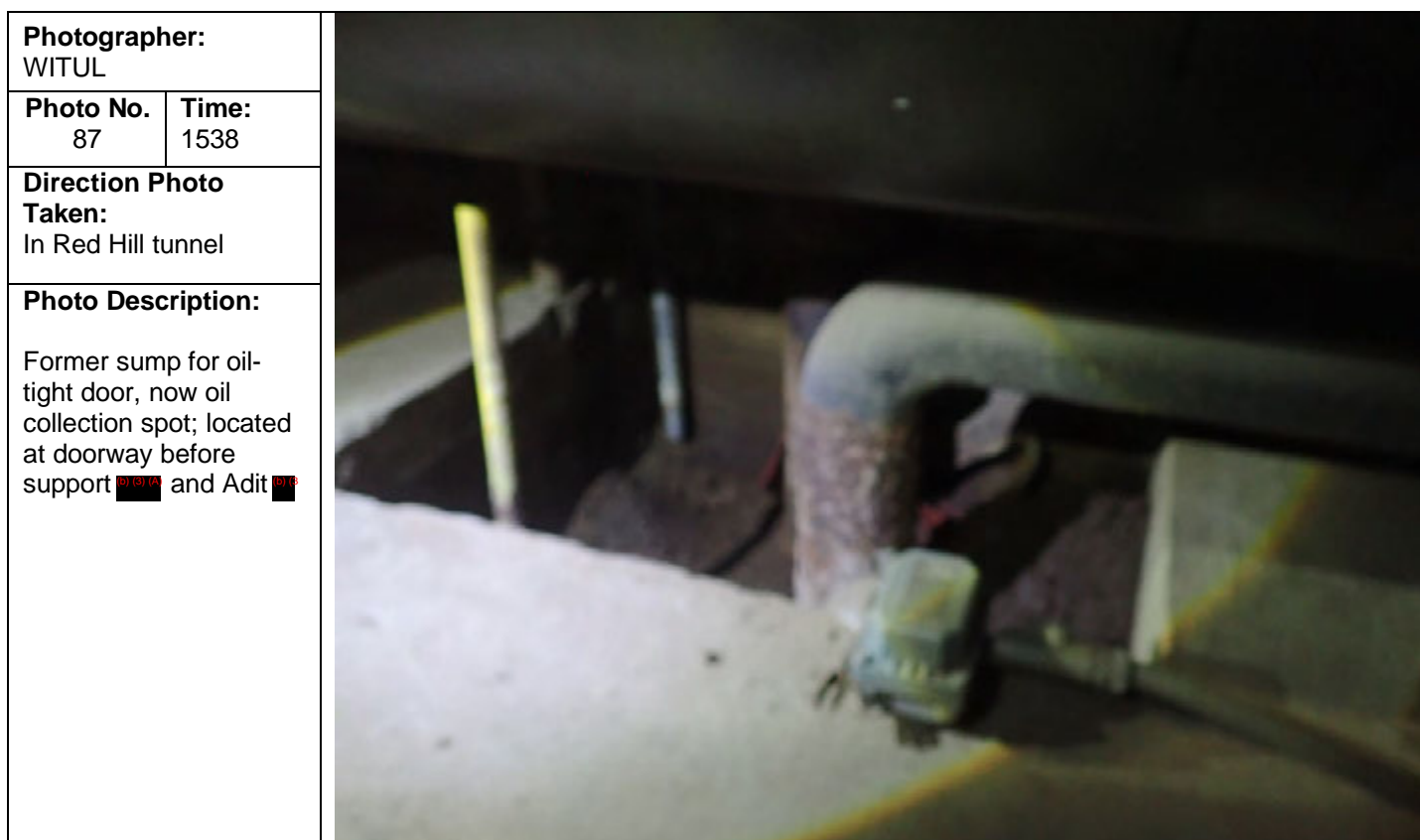


Photo No. 86	Time: 1535
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Gouge in (b) (3) (A) pipe at support (b) (3) (A) marked Gouge (b) (3) (A)	





Photographer: WITUL	
Photo No. 89	Time: 1543
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Gouge in (b) (3) (A) pipe at support (b) (3) (A) marked Gouge (b) (3) (A)	

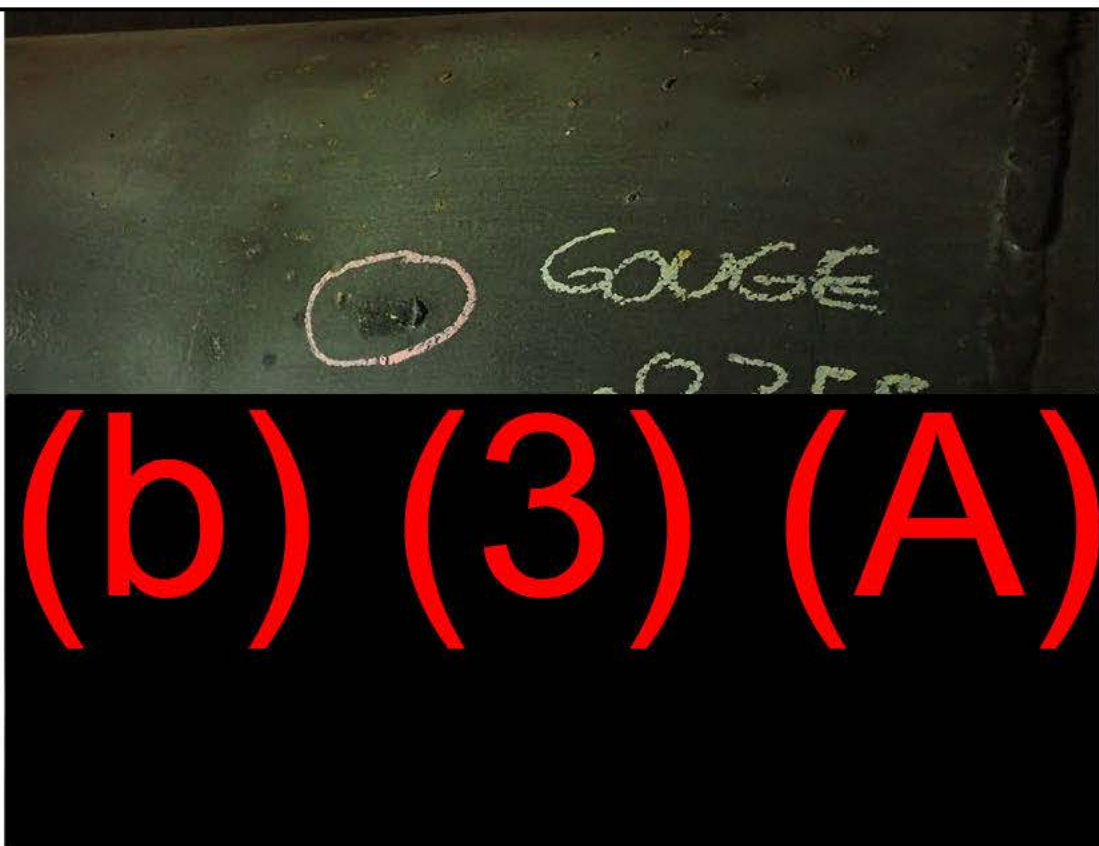
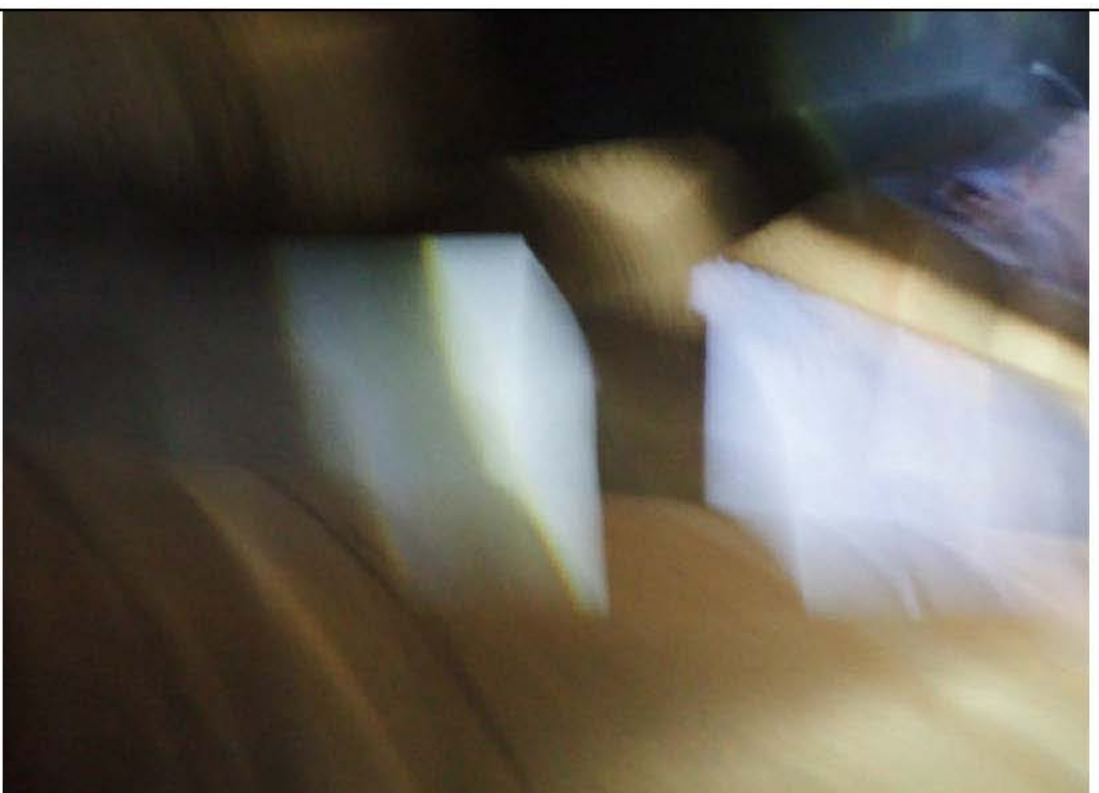


Photo No. 90	Time: 1545
Direction Photo Taken: In Red Hill tunnel	
Photo Description: Mistake or unknown image	



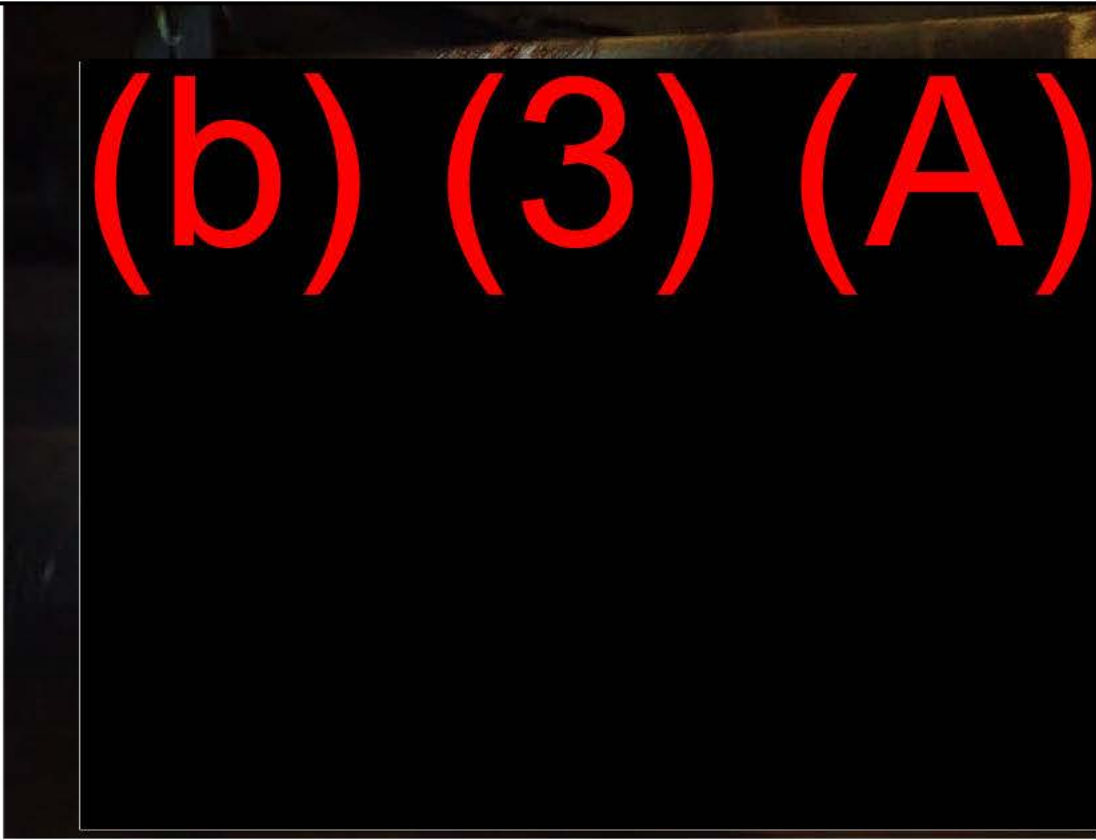
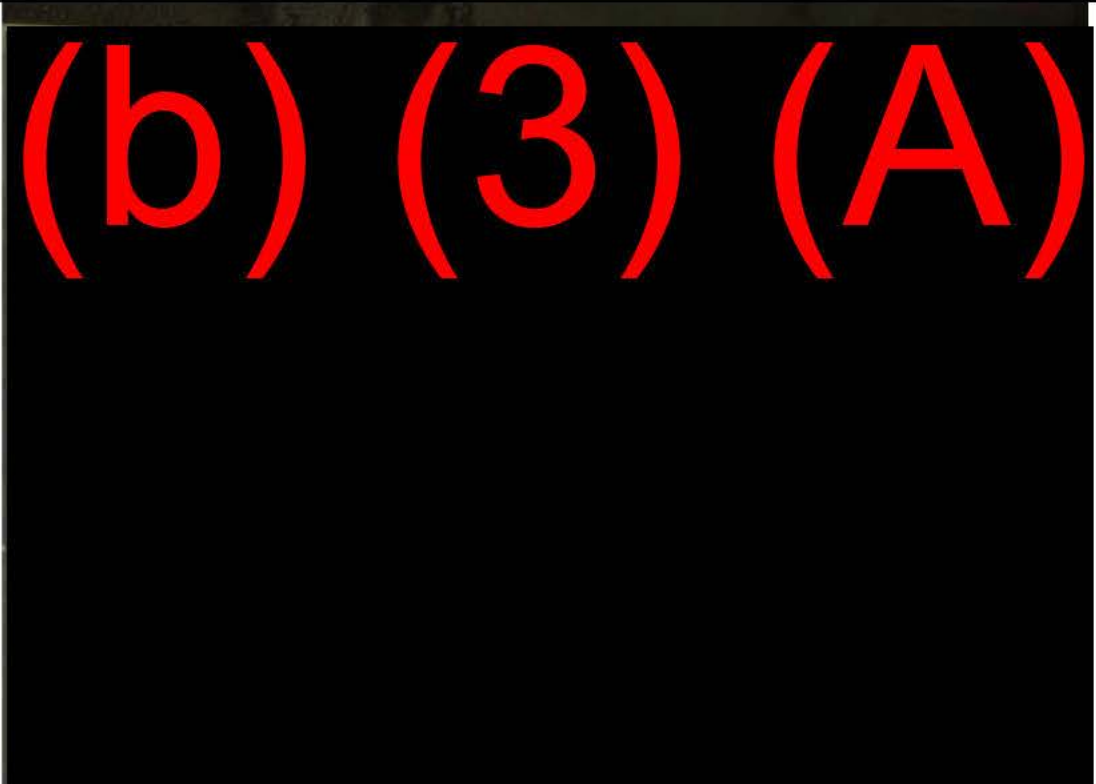
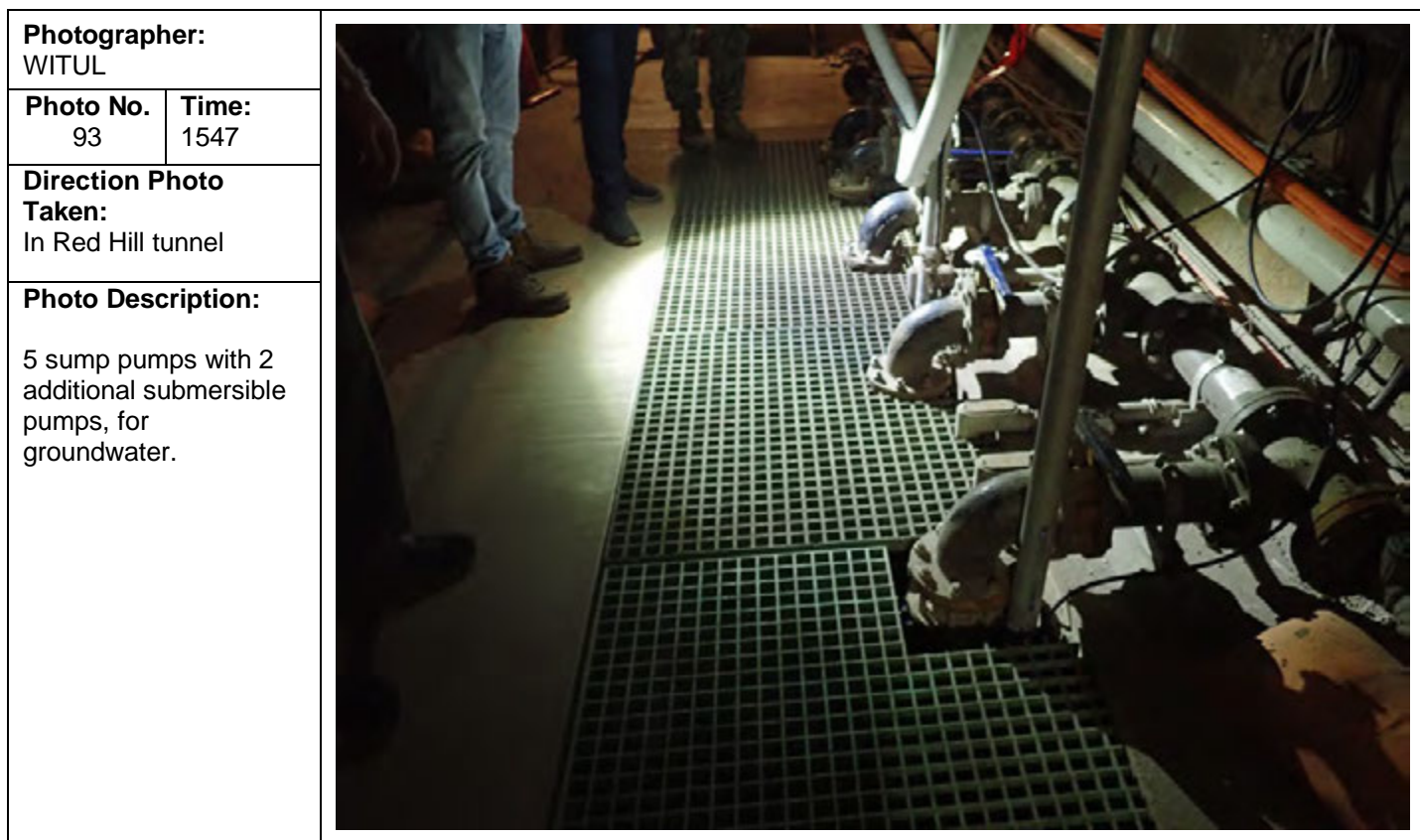
Photographer: WITUL		
Photo No. 91	Time: 1545	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Corrosion damage to (b) (3) (A) and (b) (3) (A) piping at support (b) (3) (A)		

Photo No. 92	Time: 1546	
Direction Photo Taken: In Red Hill tunnel		
Photo Description: Dent/Gouge in (b) (3) (A) line, at support (b) (3) (A) marked (b) (3) (A)		



Photographer: WITUL	
Photo No. 95	Time: 1551
Direction Photo Taken: Inside UGPH	
Photo Description: Fuel lines in Underground Pump House.	

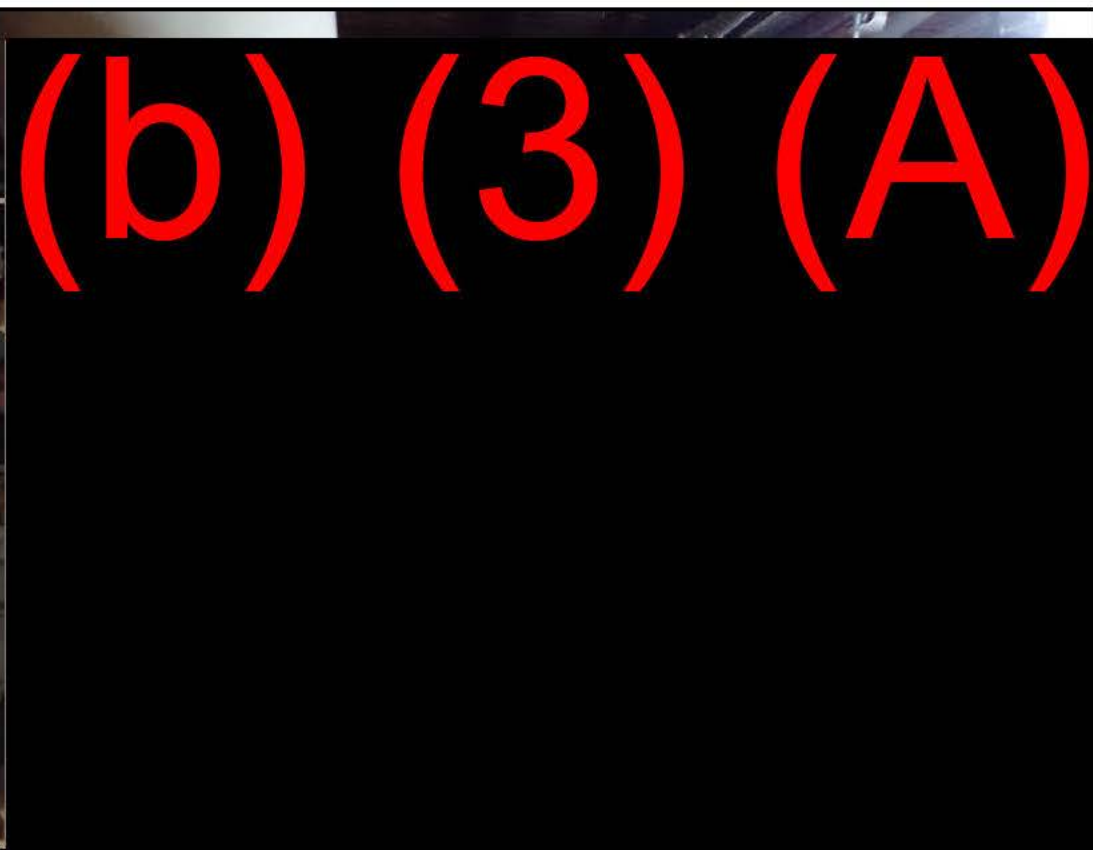


Photo No. 96	Time: 1552
Direction Photo Taken: Inside UGPH	
Photo Description: Drain to sump in UGPH bilge drain area.	



Photographer: WITUL	
Photo No. 97	Time: 1555
Direction Photo Taken: Inside UGPH	
Photo Description: Pressure gauges for fuel lines.	

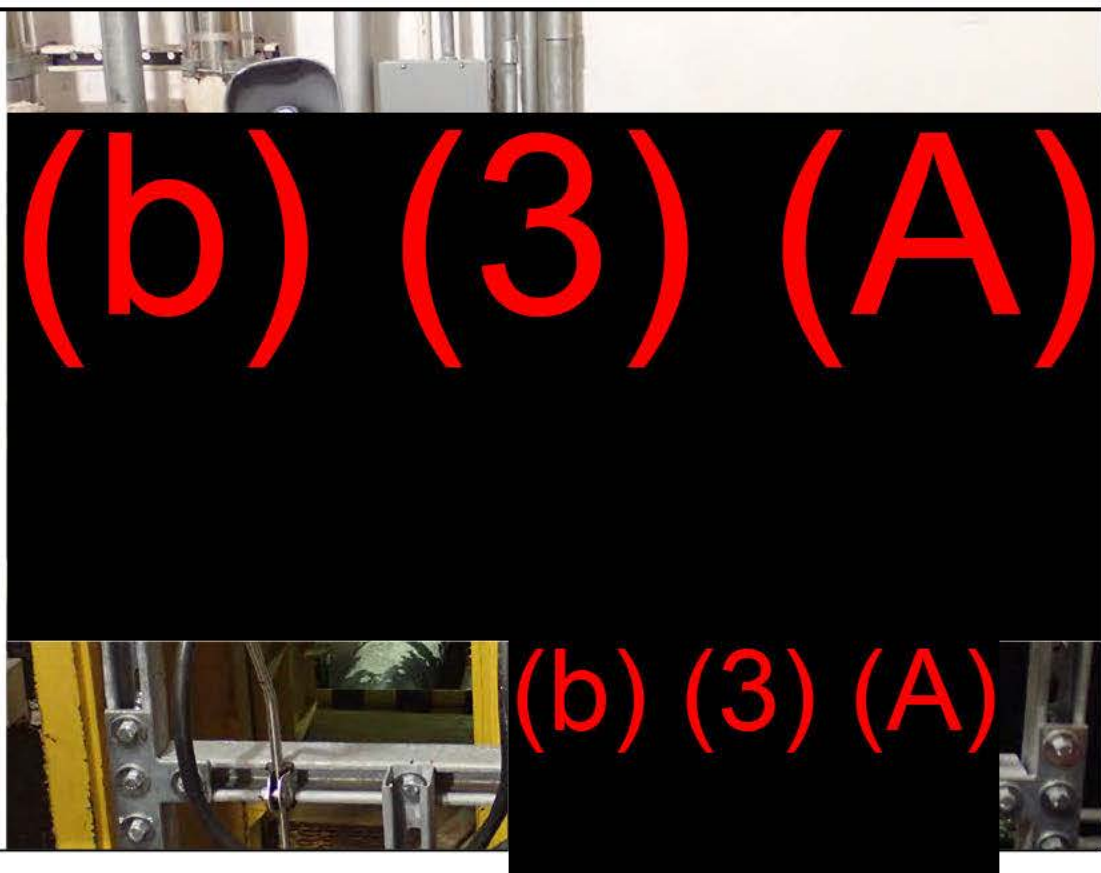
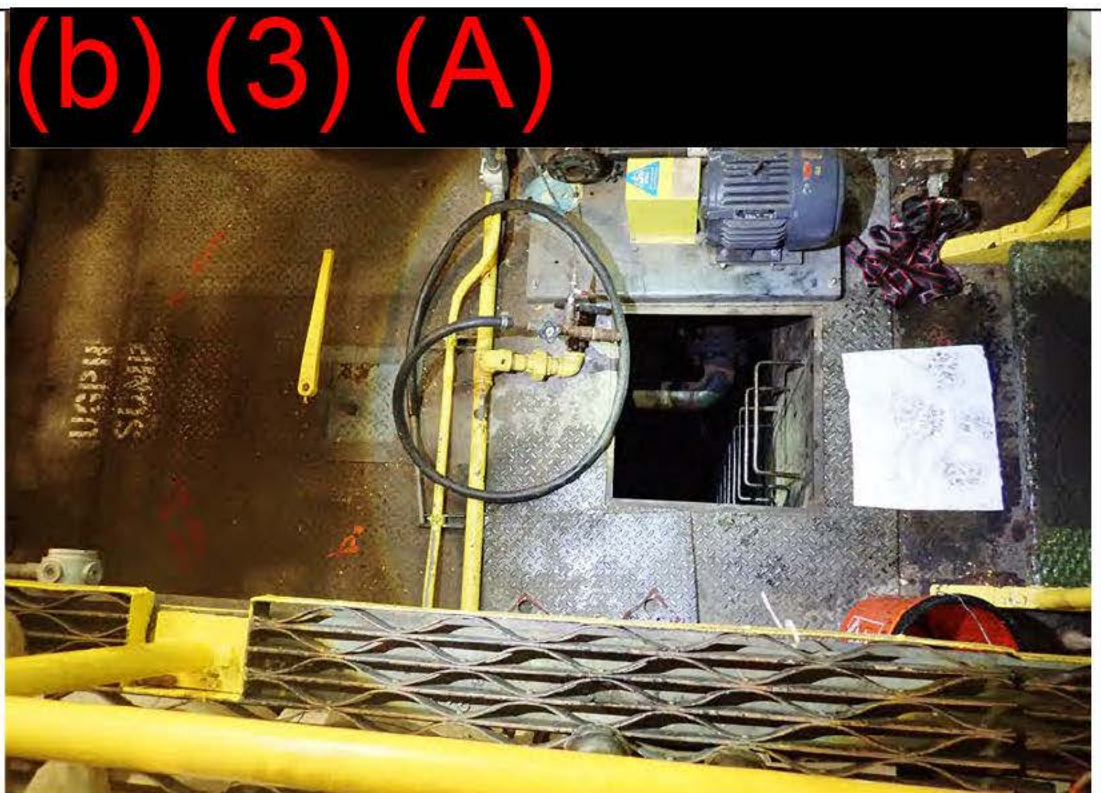


Photo No. 98	Time: 1558
Direction Photo Taken: Inside UGPH	
Photo Description: Approximately 6,000-gallon capacity fuel oil recovery (FOR) sump. Unit could be considered partially buried tank.	



Photographer: WITUL	
Photo No. 99	Time: 1601
Direction Photo Taken: Inside UGPH	
Photo Description: Additional view of FOR sump.	

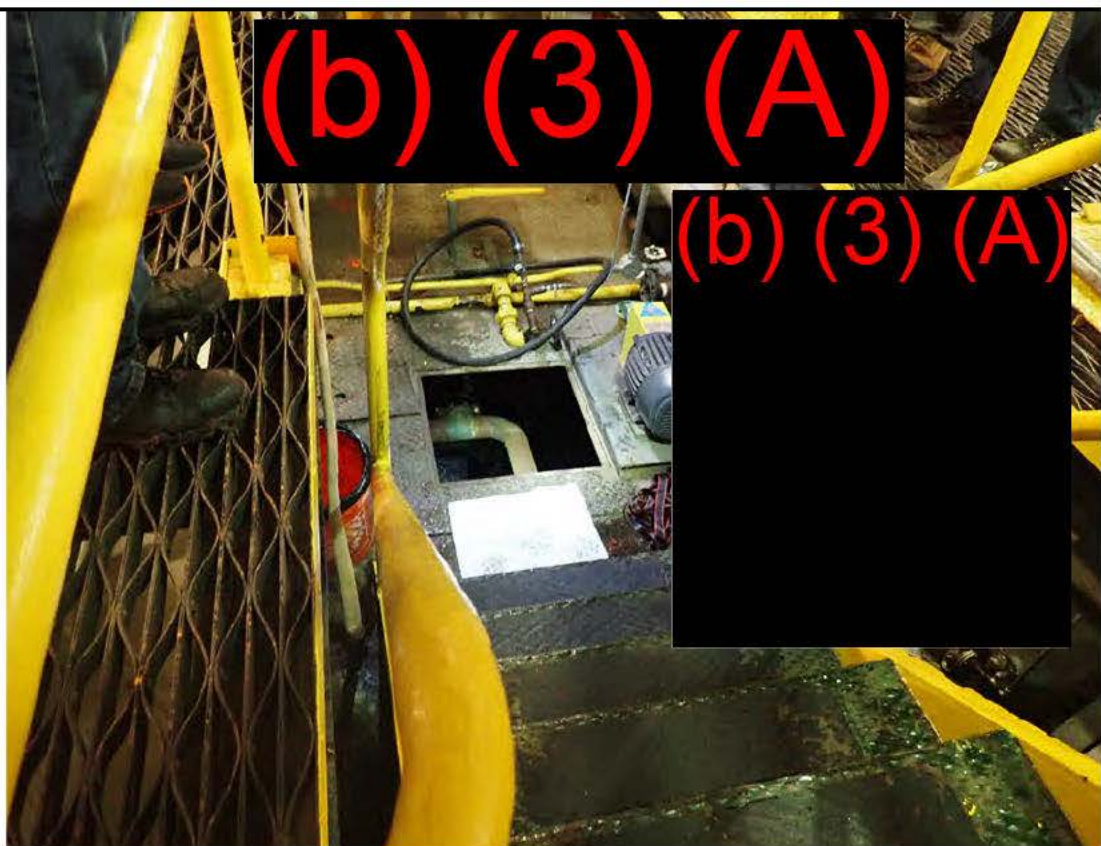
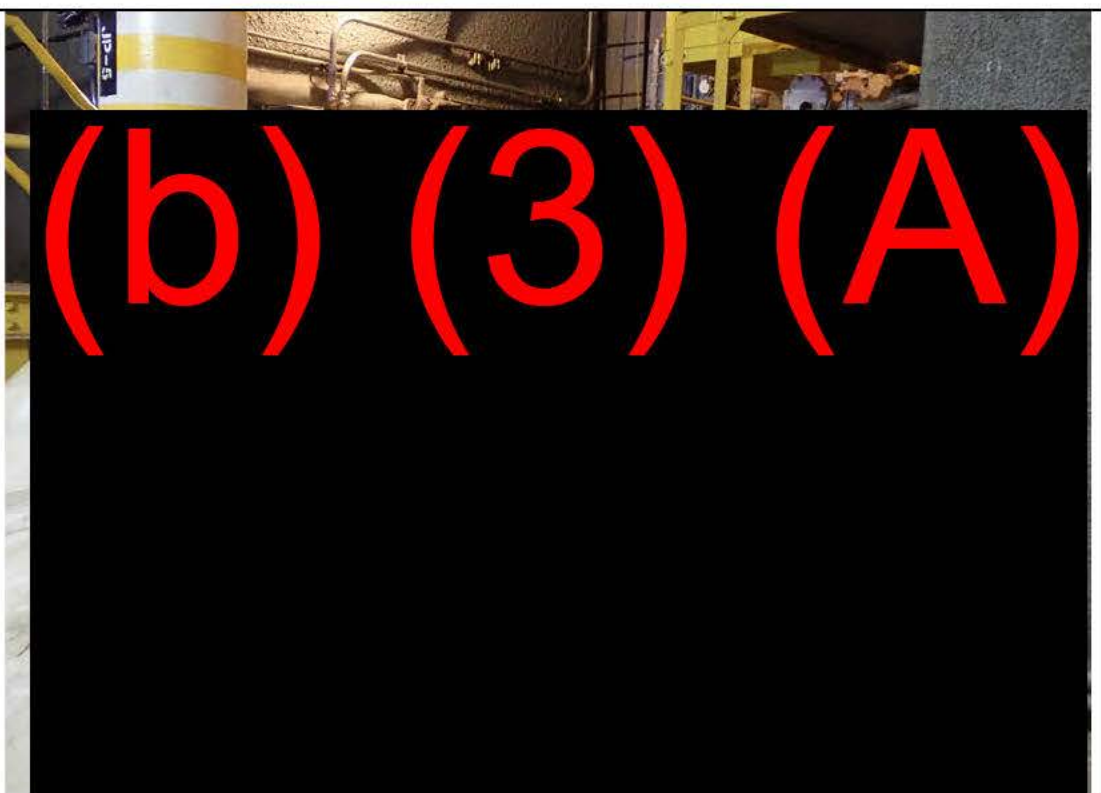


Photo No. 100	Time: 1604
Direction Photo Taken: Inside UGPH	
Photo Description: Uninsulated Dresser coupling on piping located between Surge Tanks (b) (3) (A) & (b) (3) (A)	





Photographer: WITUL		
Photo No. 101	Time: 1606	
Direction Photo Taken: Inside UGPH		
Photo Description: Exterior covering of 422,184-gallon Surge Tank F-ST4.		

Photo No. 102	Time: 1607	
Direction Photo Taken: Inside UGPH		
Photo Description: Ladder to top of Surge Tank F-ST4. Manual gaging is performed from top of tank.		

U.S. Environmental Protection Agency
Region 9 Oil Program

SPCC PHOTOGRAPHIC LOG

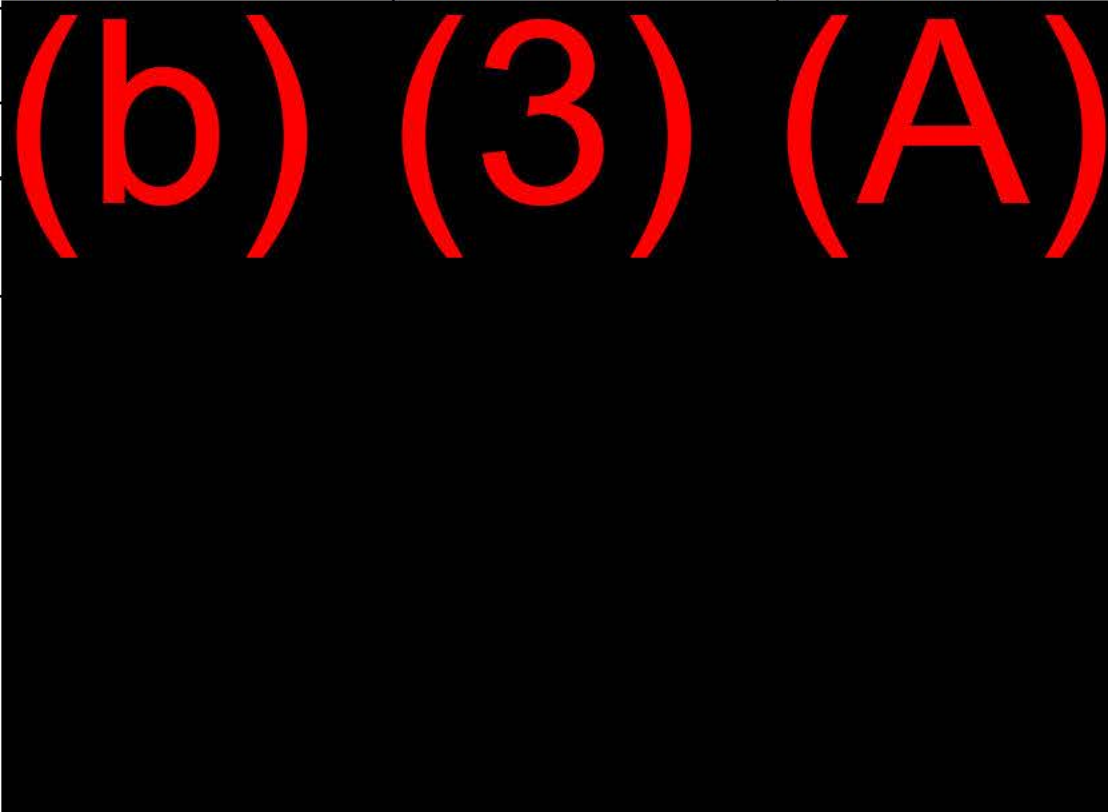
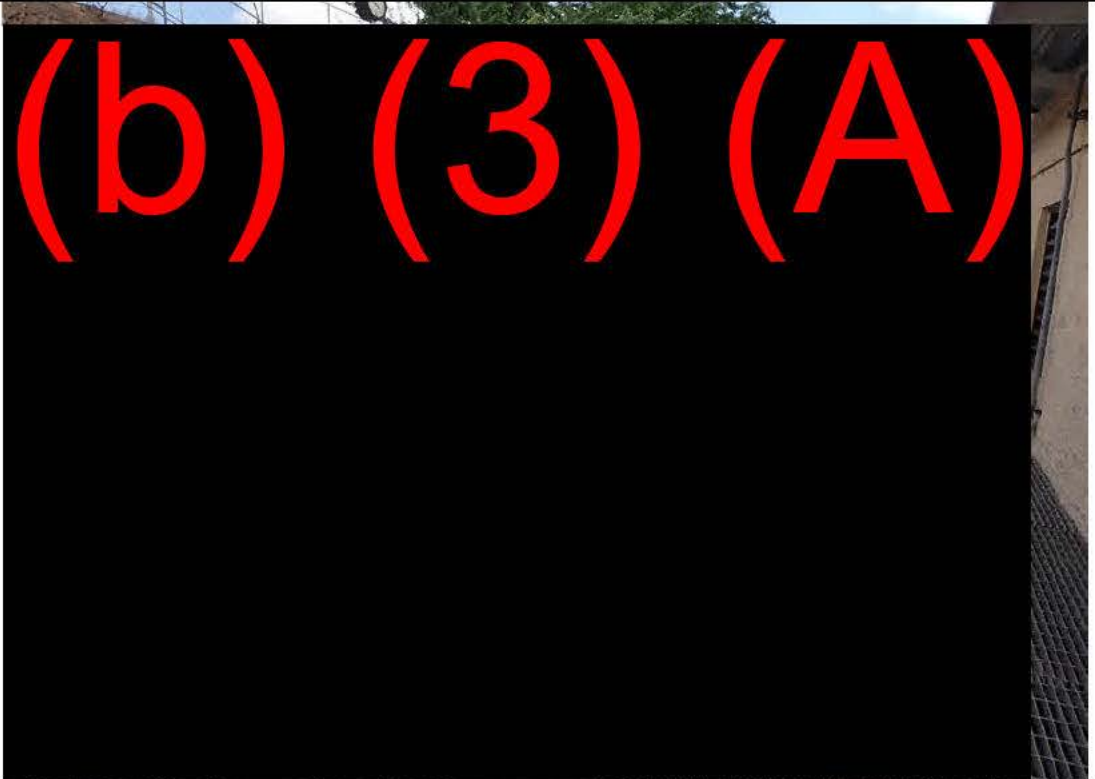
Facility Name & Location: Joint Base Pearl Harbor Hickam		Photographer: J Witul	Camera: Olympus Tough TG-5
Dates Photographs Were Taken: March 3, 2022			
Photo No. 1	Time: 1324		
Direction Photo Taken: SE			
Photo Description: Bldg (b) (3) (A) -gal double-walled slop oil Tank FLC-1554 in Defense Fuel Supply Center Pearl Harbor (DFSP PH) Bulk Terminal Pump House.			

Photo No. 2	Time: 1325	
Direction Photo Taken: S		
Photo Description: Fuel lines at rear of Pump House (b) (3) (A) building.		

Photographer: WITUL	
Photo No. 3	Time: 1327
Direction Photo Taken: ENE	
Photo Description: Piping runs, behind Pump House building. (b) (3) (A)	

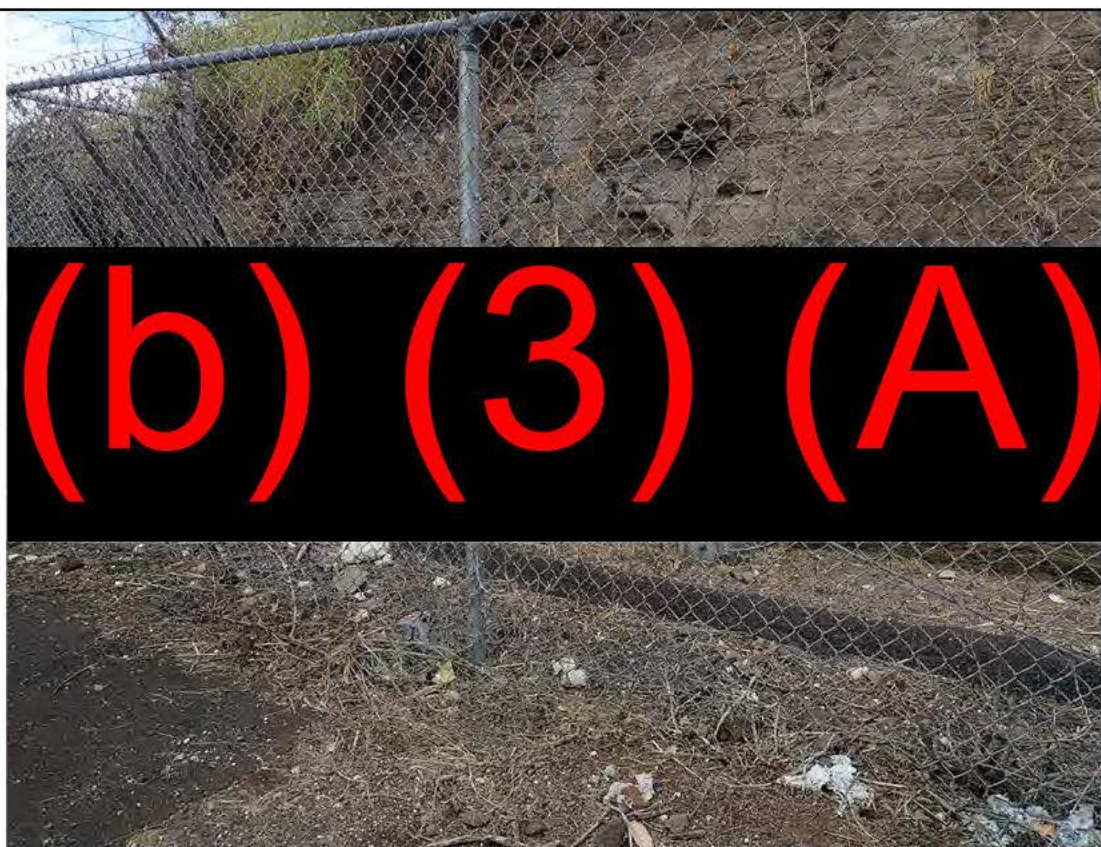
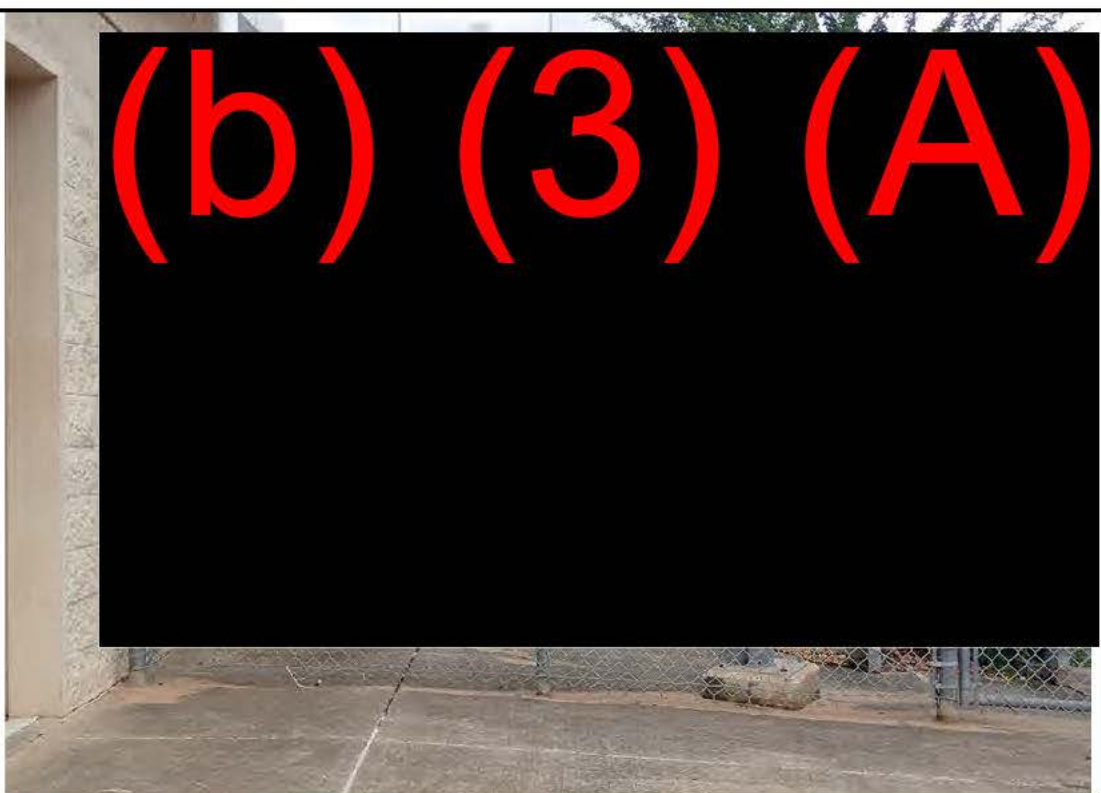


Photo No. 4	Time: 1329
Direction Photo Taken: E	
Photo Description: Fuel lines exiting at (b) (3) (A) side of Pump House building.	



Photographer: WITUL	
Photo No. 5	Time: 1330
Direction Photo Taken: SE	
Photo Description: Fuel piping run from Pump House (b) (3) (A) to DFSP PH Airfield, alongside parking lot (b) (3) (A) Upper Tank Farm. Movable bollards to protect pipeline from vehicles are absent from distant part of piping length.	

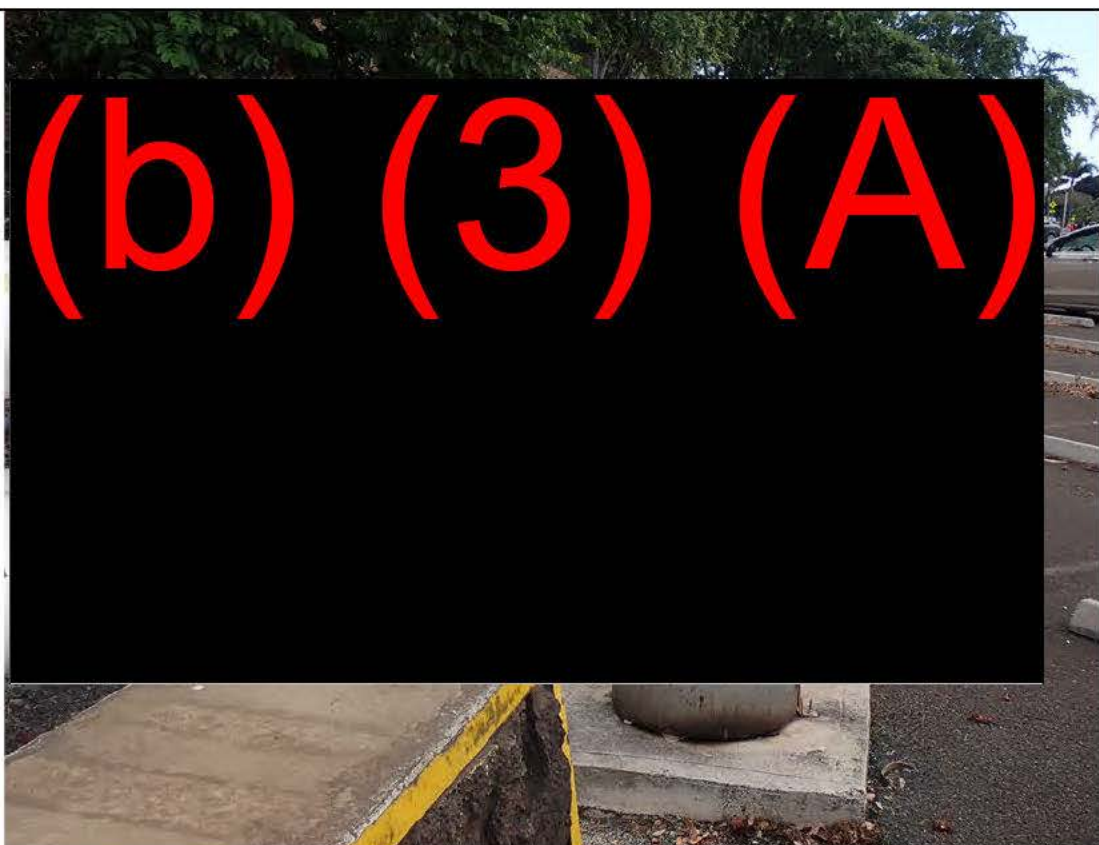
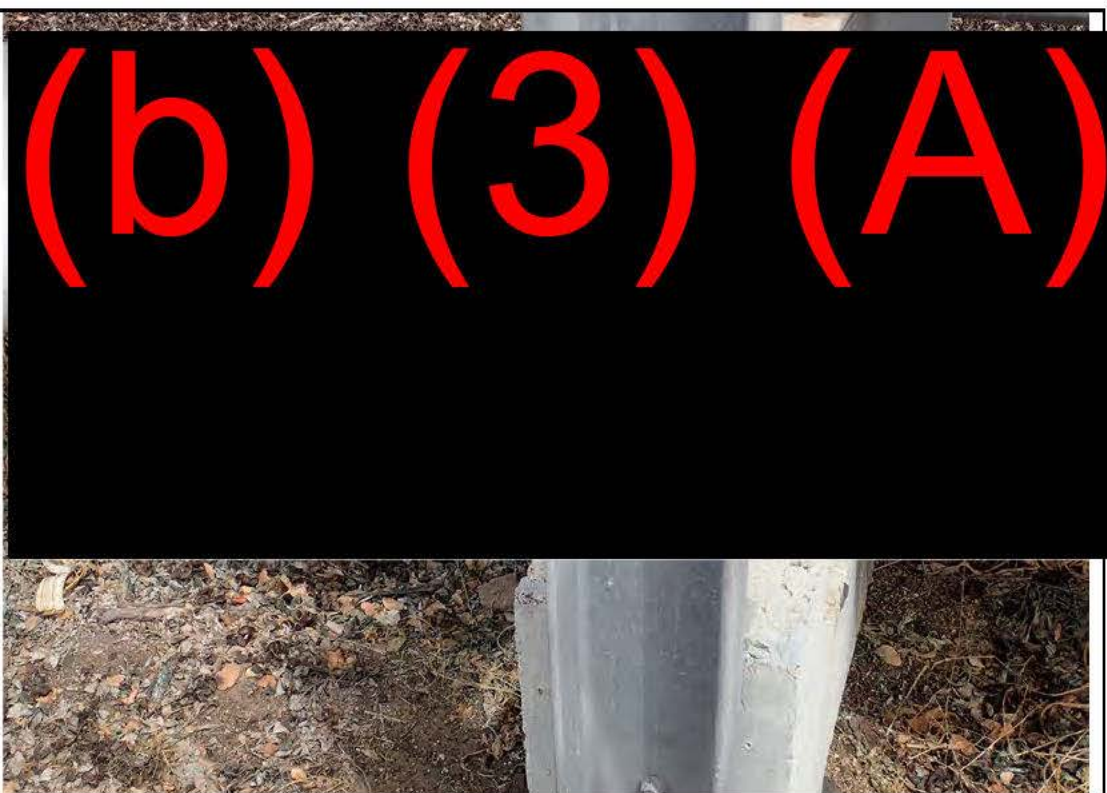


Photo No. 6	Time: 1340
Direction Photo Taken: Close-up	
Photo Description: Pits and dings in piping, that were marked during pipeline inspection.	



Photographer: WITUL	
Photo No. 7	Time: 1344
Direction Photo Taken: Close-up	
Photo Description: Damaged pipe pads, and areas of pipe damage. Metal on concrete may have caused damage to pipe, requiring inspection of line.	

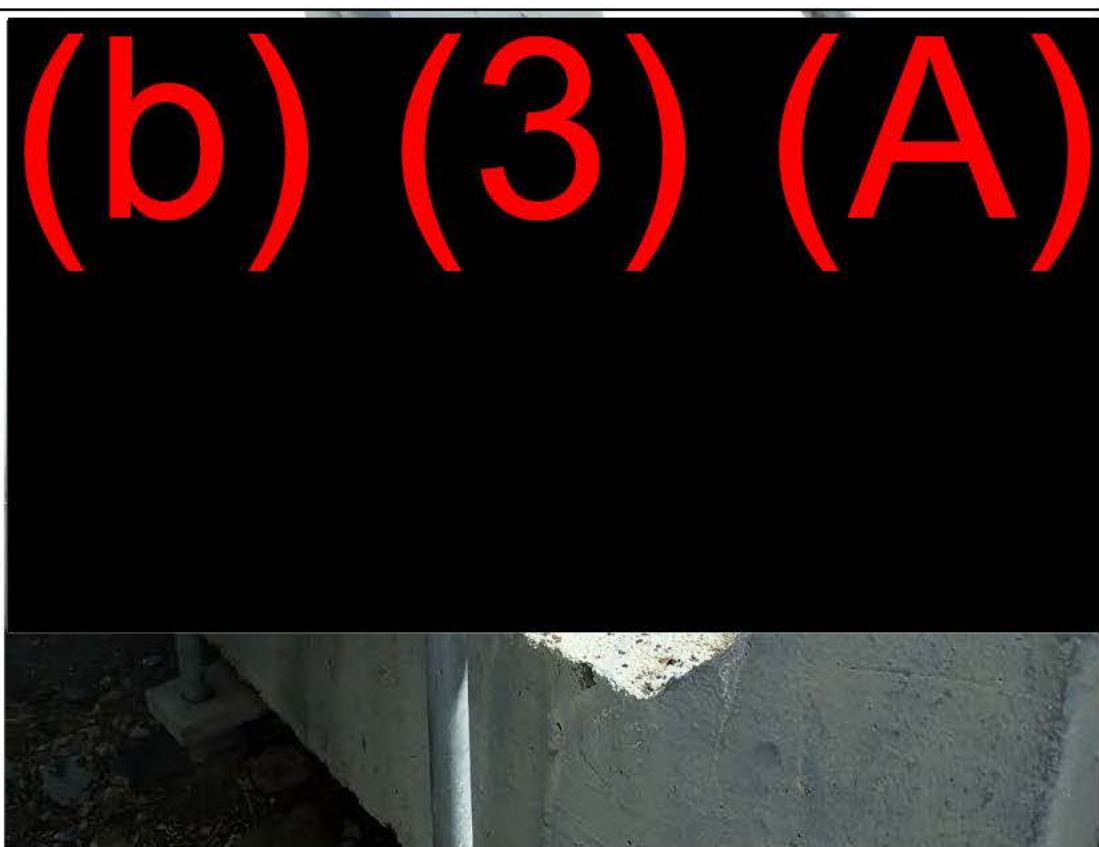
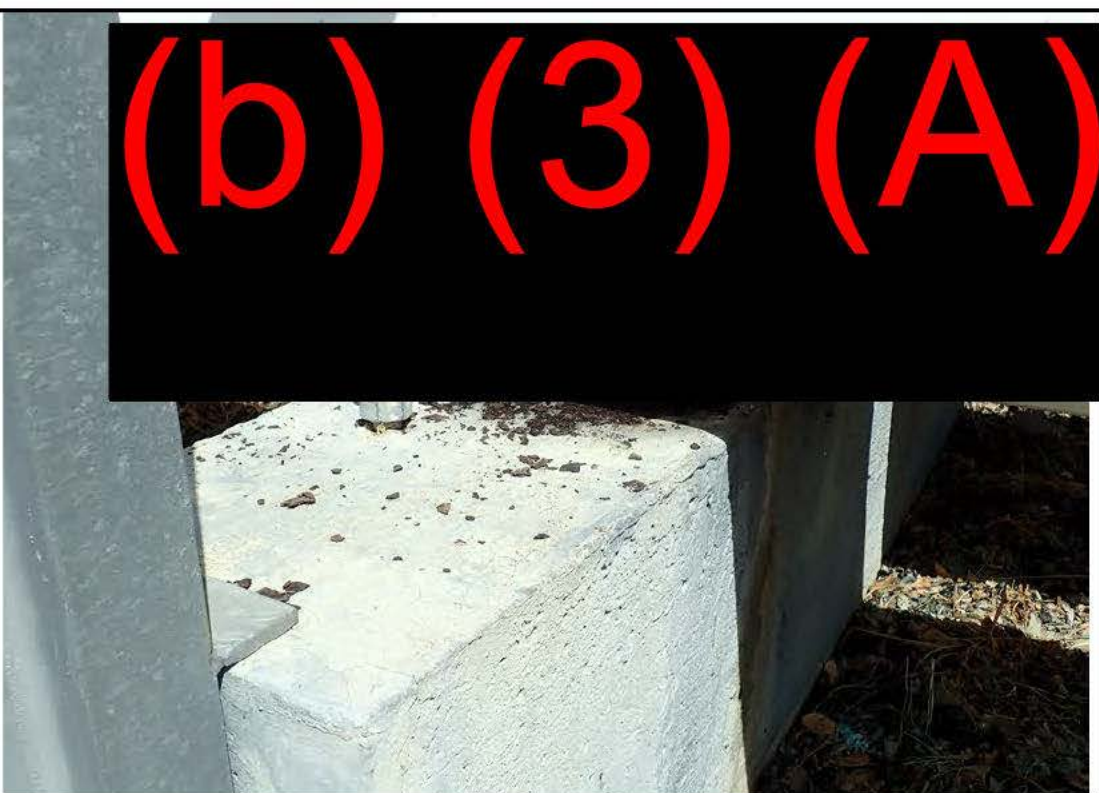


Photo No. 8	Time: 1345
Direction Photo Taken: Close-up	
Photo Description: Damaged pipe support pad, closer view.	



Photographer: WITUL	
Photo No. 9	Time: 1356
Direction Photo Taken: E	
Photo Description: Rectifier where piping goes underground, at Valve Station number 0010214	

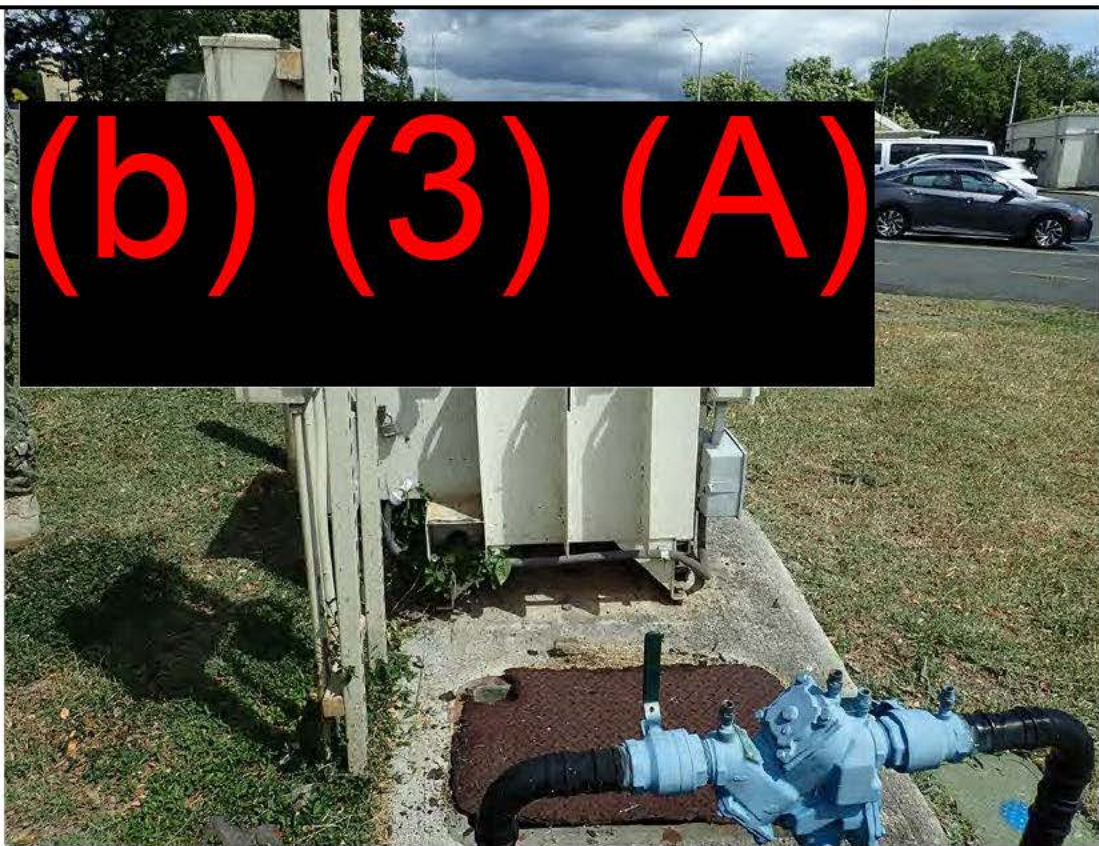
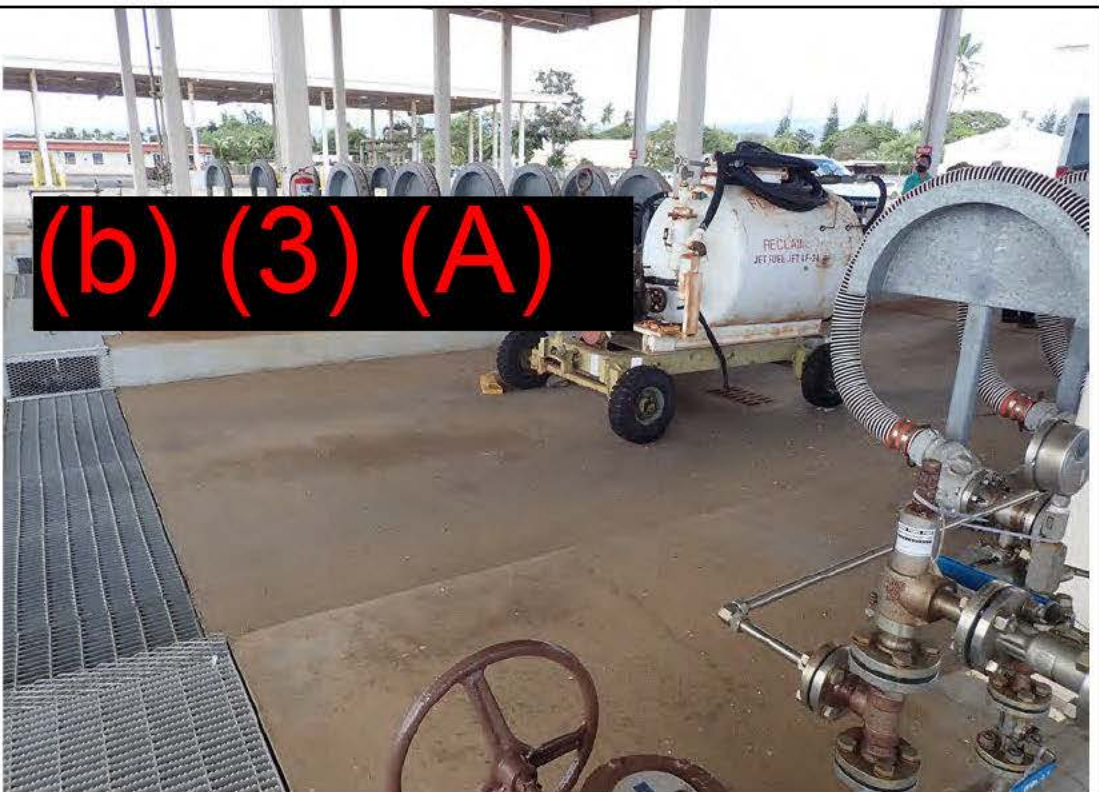


Photo No. 10	Time: 1430
Direction Photo Taken: N	
Photo Description: Unloading area at NAVSUP Fuel Dep. Grated trench drains at left of image lead to sunken concrete unloading pit. Small drain under mobile Reclaimed Jet Fuel tank leads to sump at fence line.	

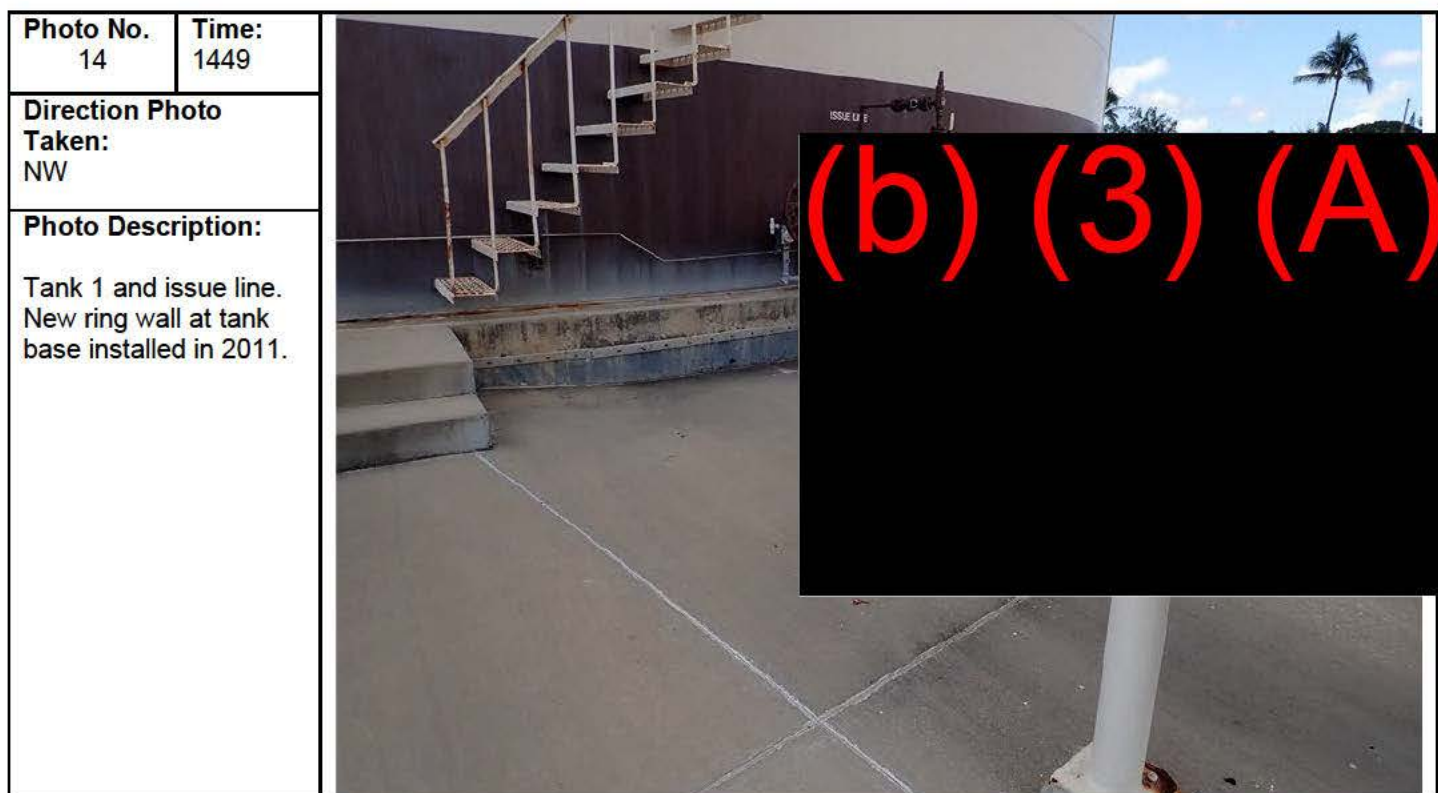


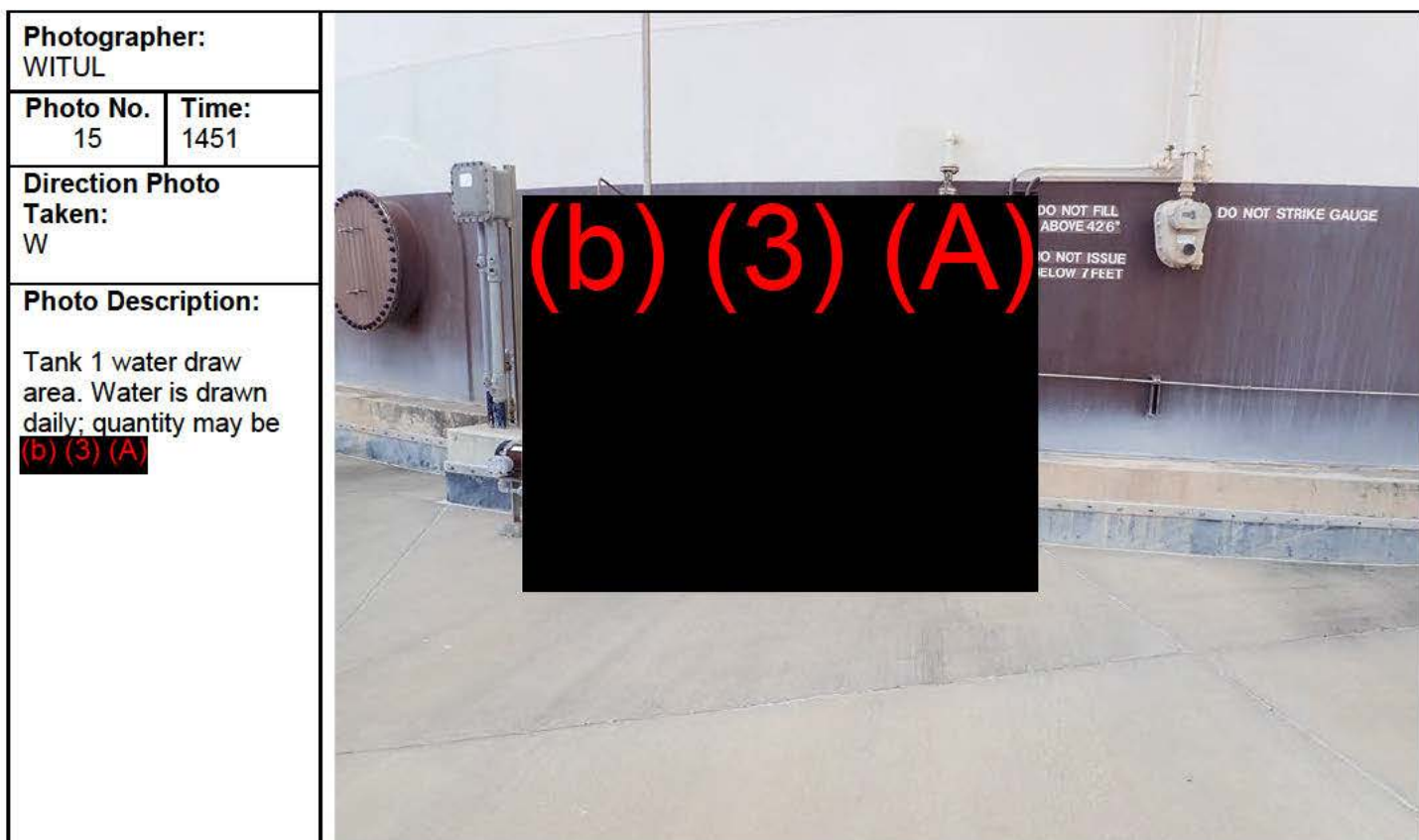
Photographer: WITUL	
Photo No. 11	Time: 1441
Direction Photo Taken: NE	
Photo Description: (b) (3) (A) 1 F-24 Tank (b) (3) (A) (Tank 2) in concrete secondary containment in Fuels Area Tank Farm at Hickam AFB.	

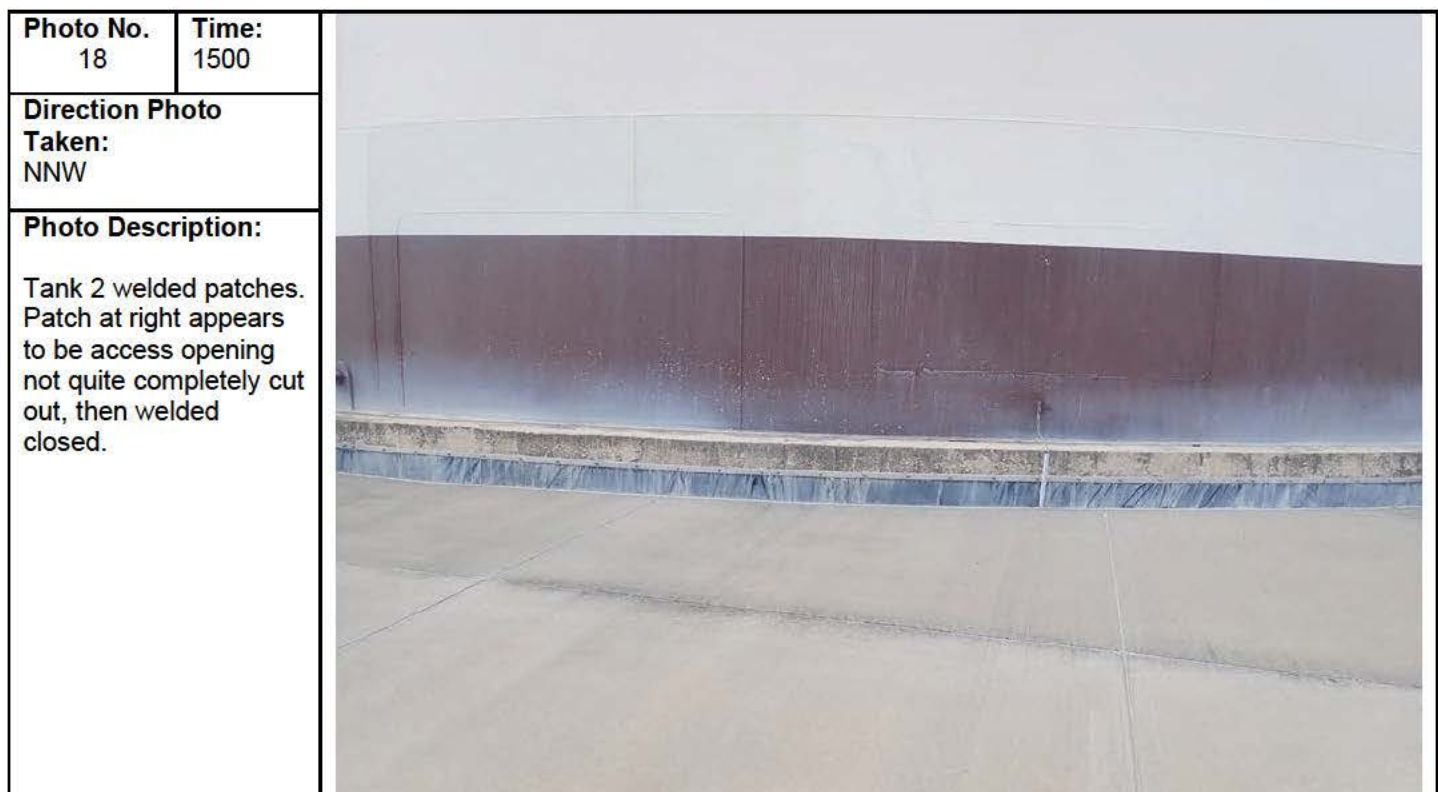
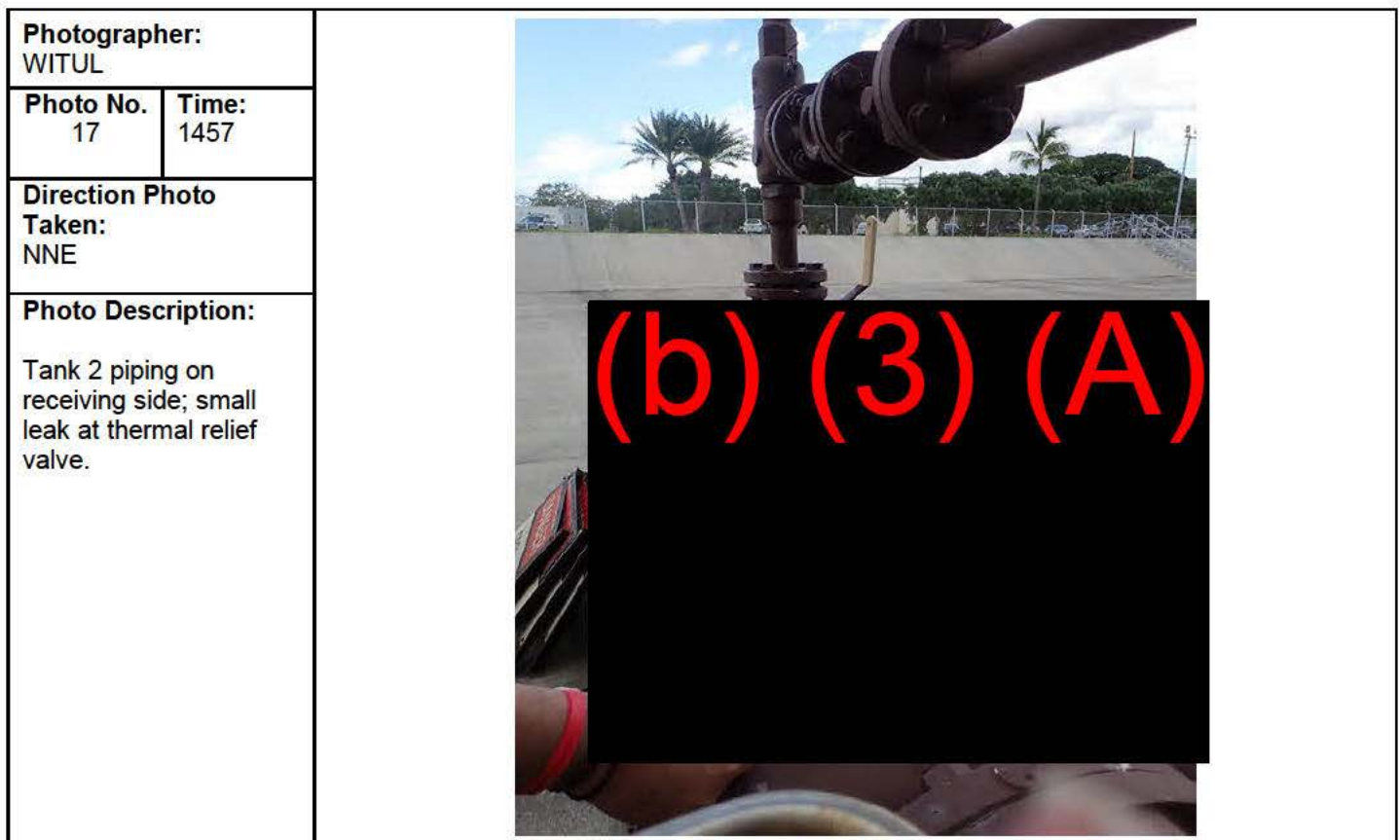


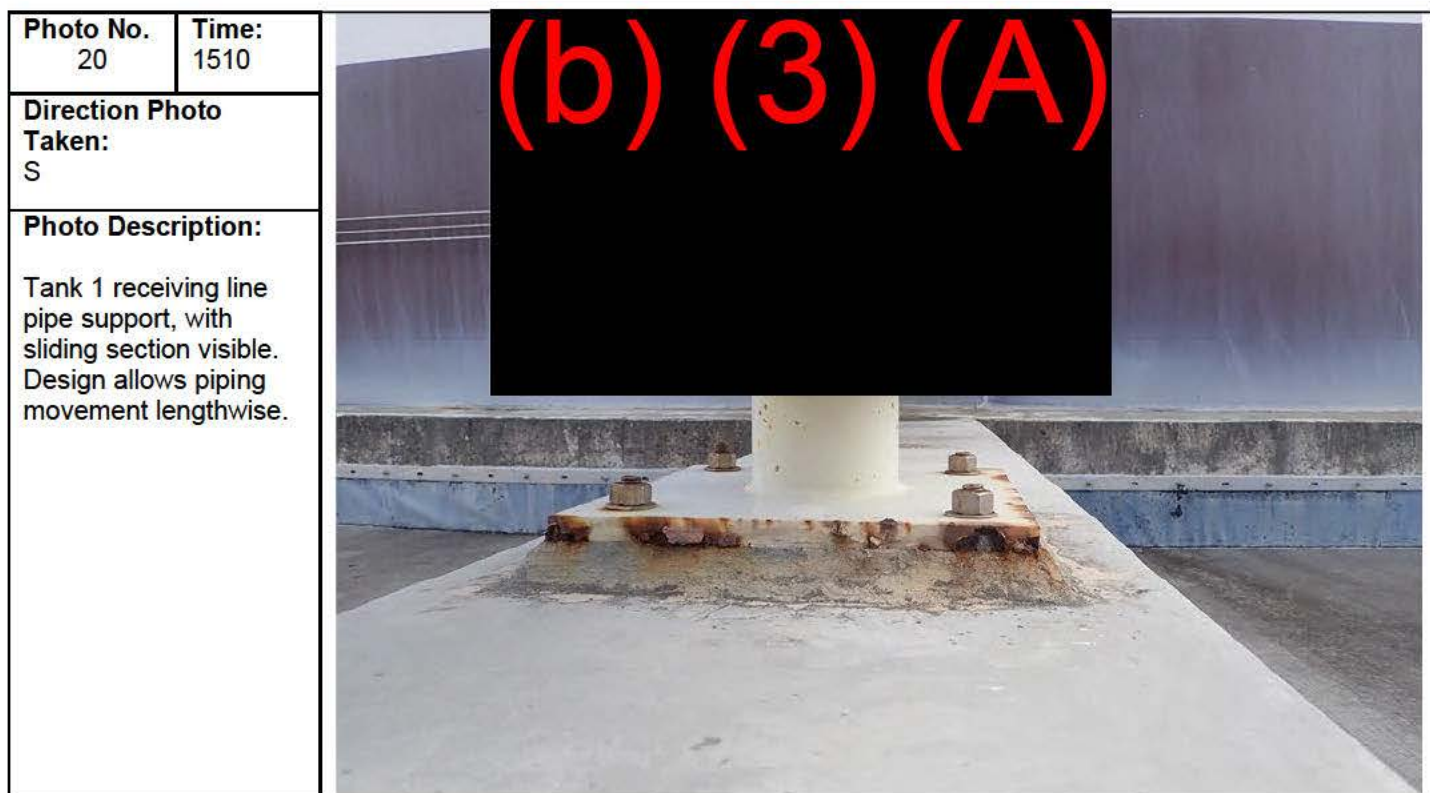
Photo No. 12	Time: 1441
Direction Photo Taken: NW	
Photo Description: (b) (3) (A) -gal F-24 Tank (b) (3) (A) (Tank 1) in concrete secondary containment in Fuels Area Tank Farm at Hickam AFB. Tank 4 at left in distance.	

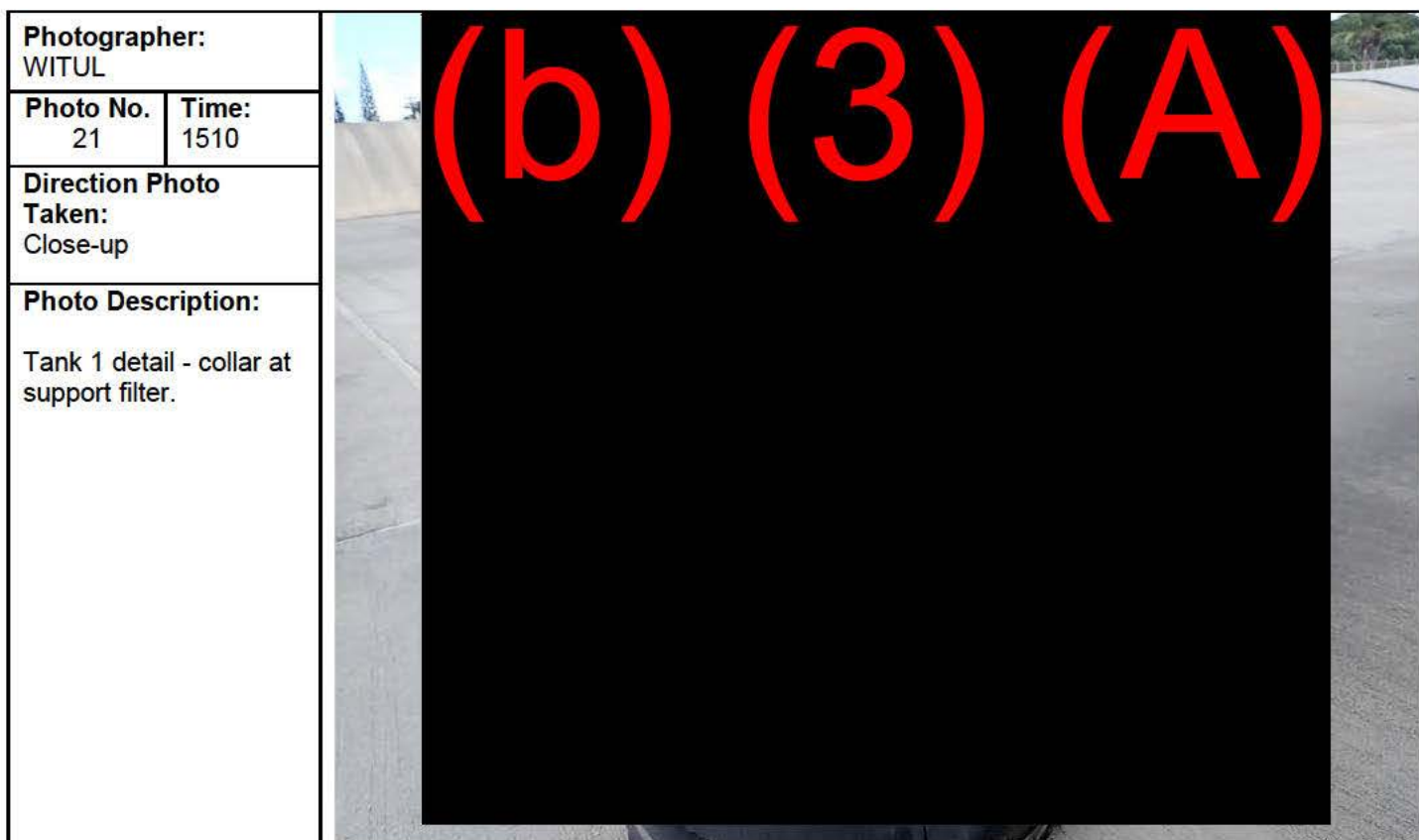












Photographer: WITUL	
Photo No. 23	Time: 1515
Direction Photo Taken: Close-up	
Photo Description: Drain valve pit; valves from Tanks 3 and 4 indicate shut.	

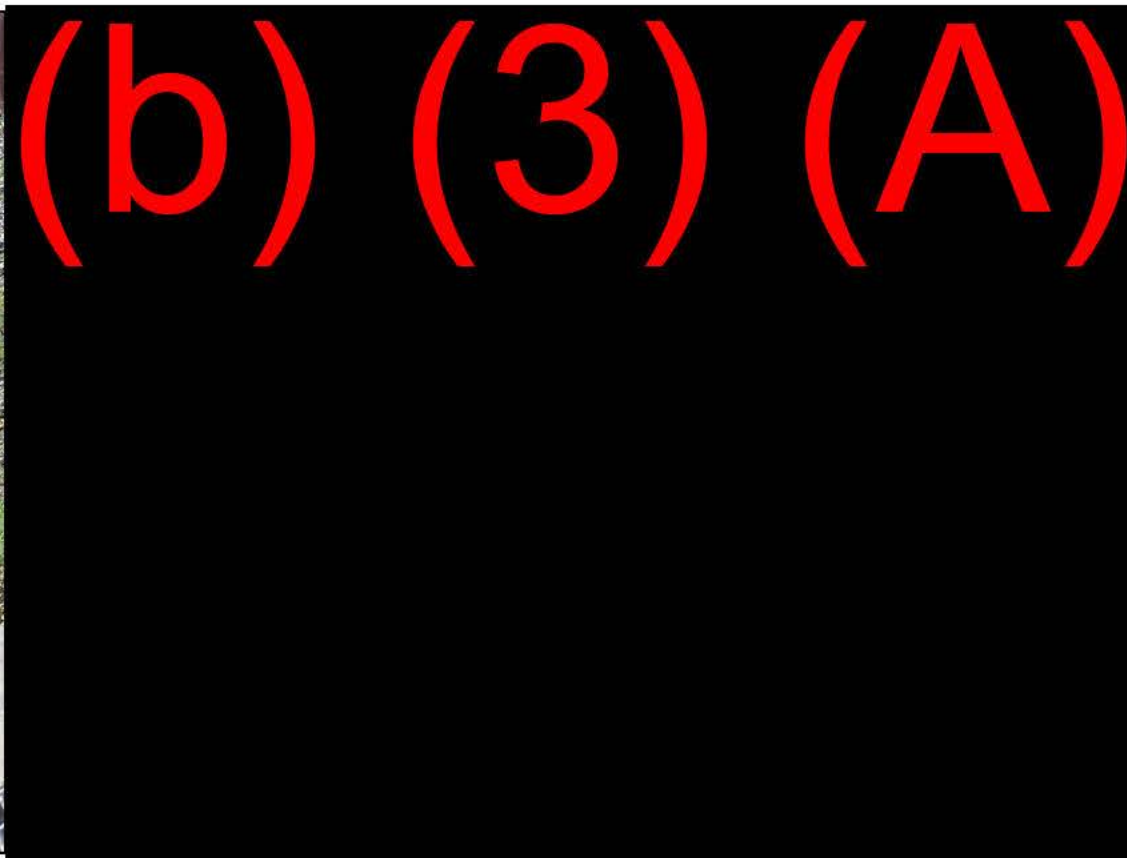
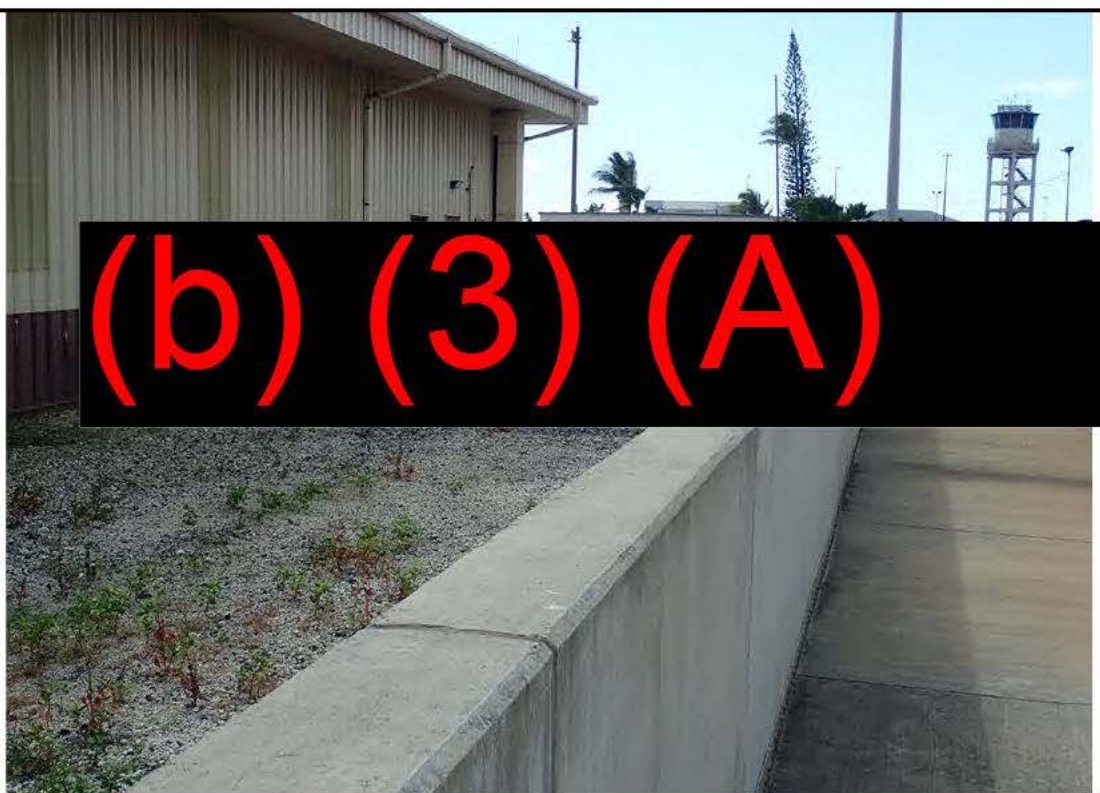


Photo No. 24	Time: 1518
Direction Photo Taken: W	
Photo Description: Piping from Tanks 3 and 4 at Hickam Fuels Area (b) (3) (A) Tank Farm to Pump House (b) (3) (A)	



Photographer: WITUL	
Photo No. 25	Time: 1520
Direction Photo Taken: Close-up	
Photo Description: Plug valve stem area at Tank 3 issue side, with indication of minor weeping.	

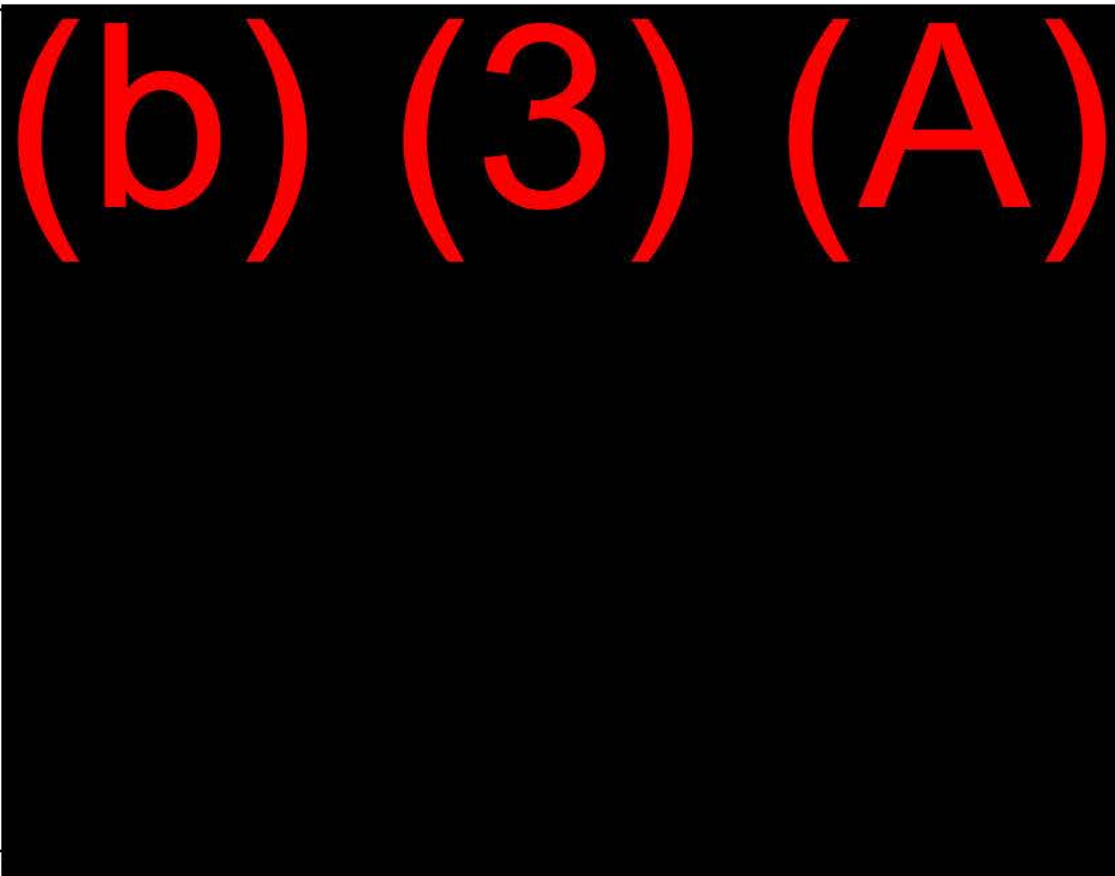


Photo No. 26	Time: 1525
Direction Photo Taken: Close-up	
Photo Description: Tank 3 manufacturer's specification plate. Maximum capacity (b) (3) (A) BBL tank completed in 2003, fabricated by Rocky Mountain Fabrication to API Standard 650.	



Photographer: WITUL	
Photo No. 27	Time: 1529
Direction Photo Taken: Close-up	
Photo Description: Plug valve stem area at Tank 4, with indication of weeping.	

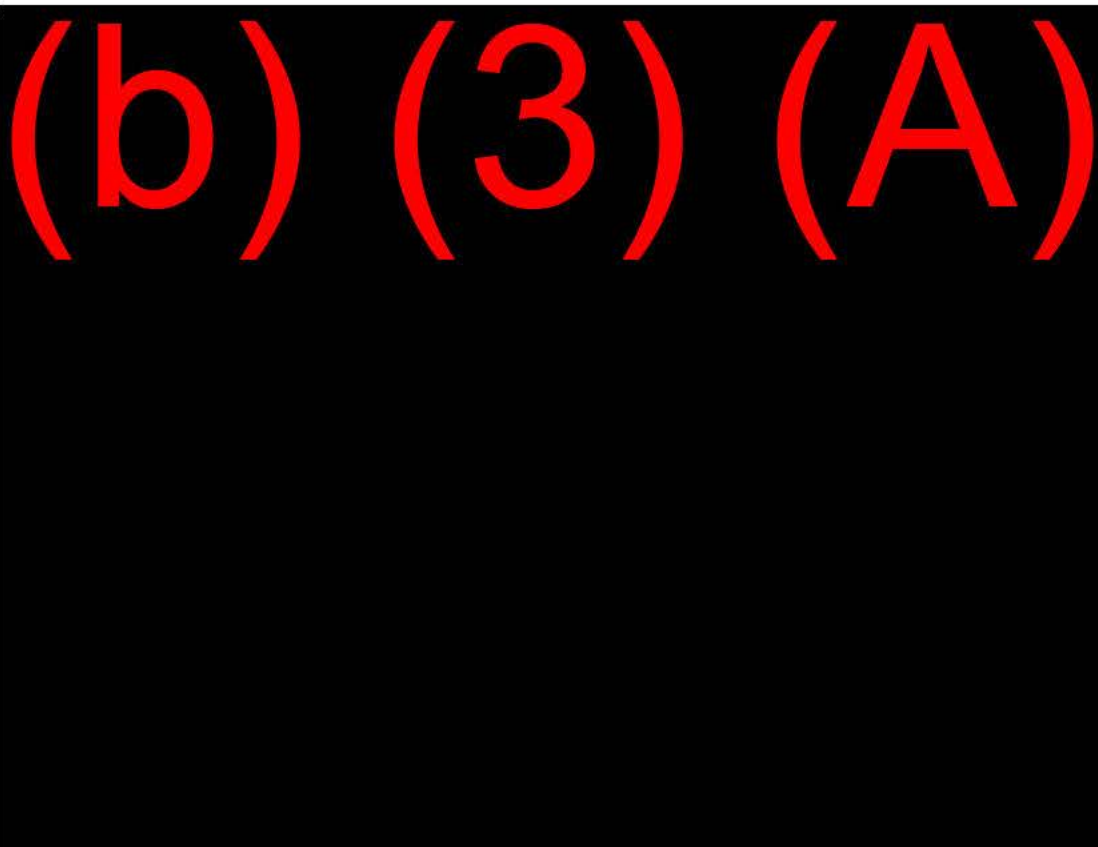


Photo No. 28	Time: 1532
Direction Photo Taken:	
Photo Description: Tank 4 manufacturer's specification plate & repair label plate. Maximum capacity (b) (3) (A) BBL tank completed in 2003, fabricated by Rocky Mountain Fabrication to API Standard 650. Tank completed in 2003. Repairs/alterations in accordance with API Standard 653 completed in January 2018.	



Photographer: WITUL	
Photo No. 29	Time: 1534
Direction Photo Taken: Close-up	
Photo Description: Tank 4 valve with corrosion evident; dissimilar metals possibly causing or accelerating reaction.	

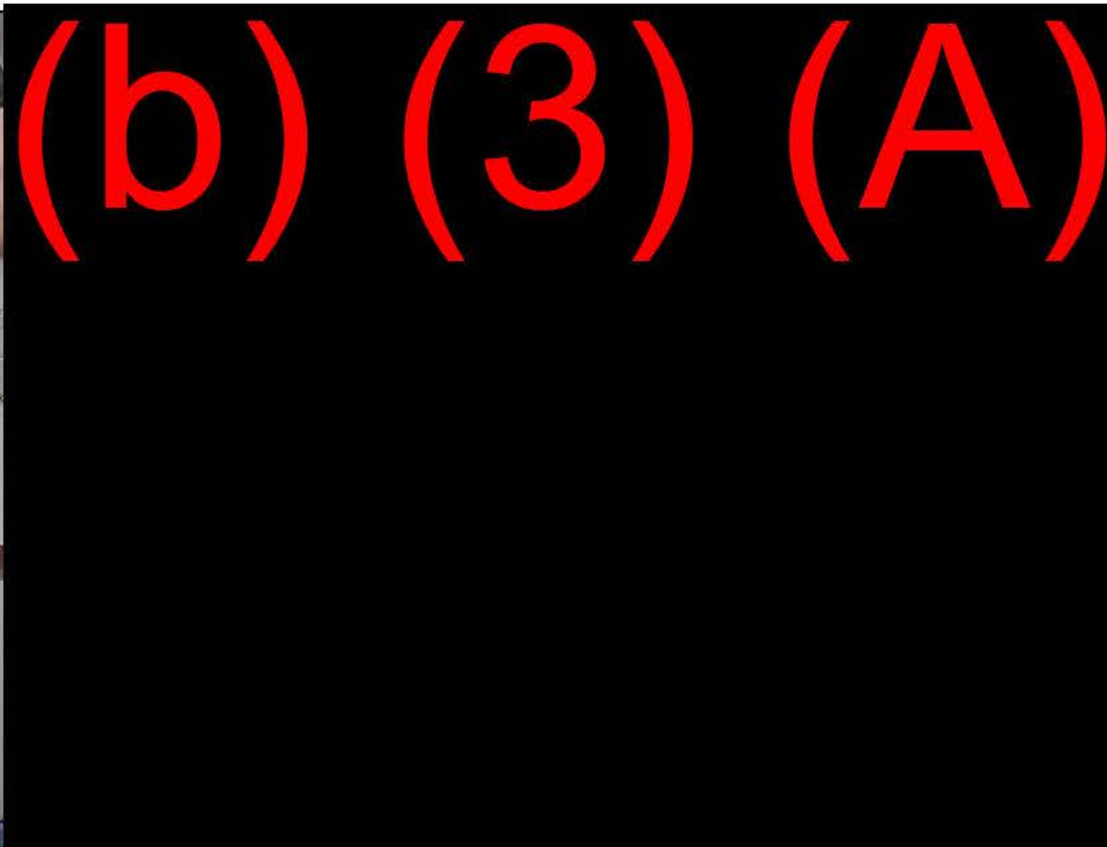
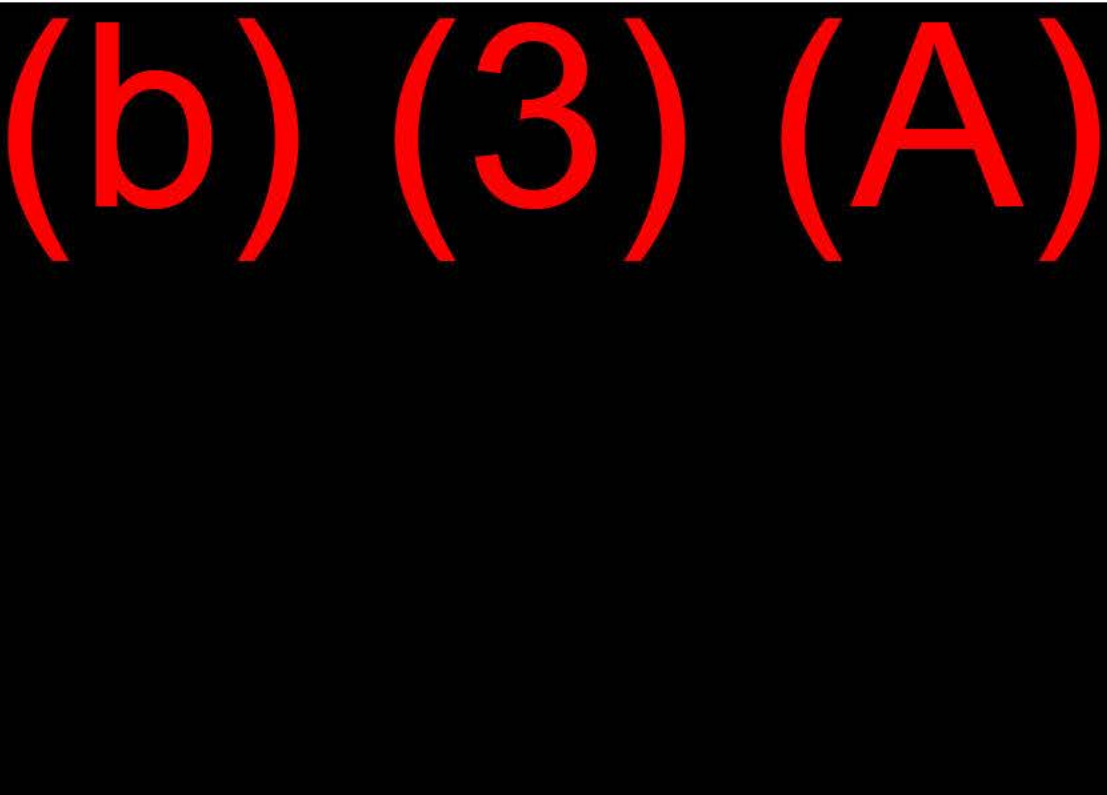
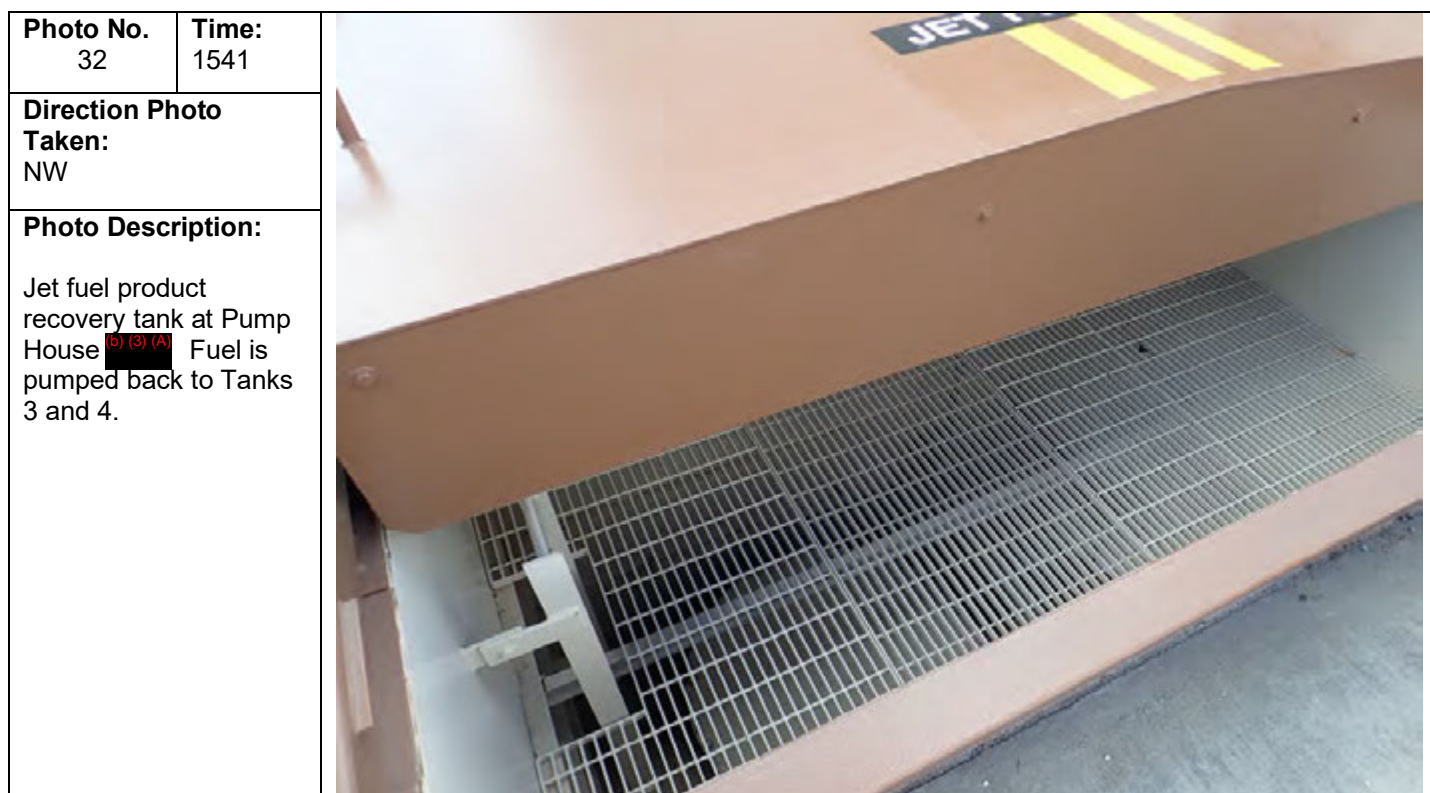
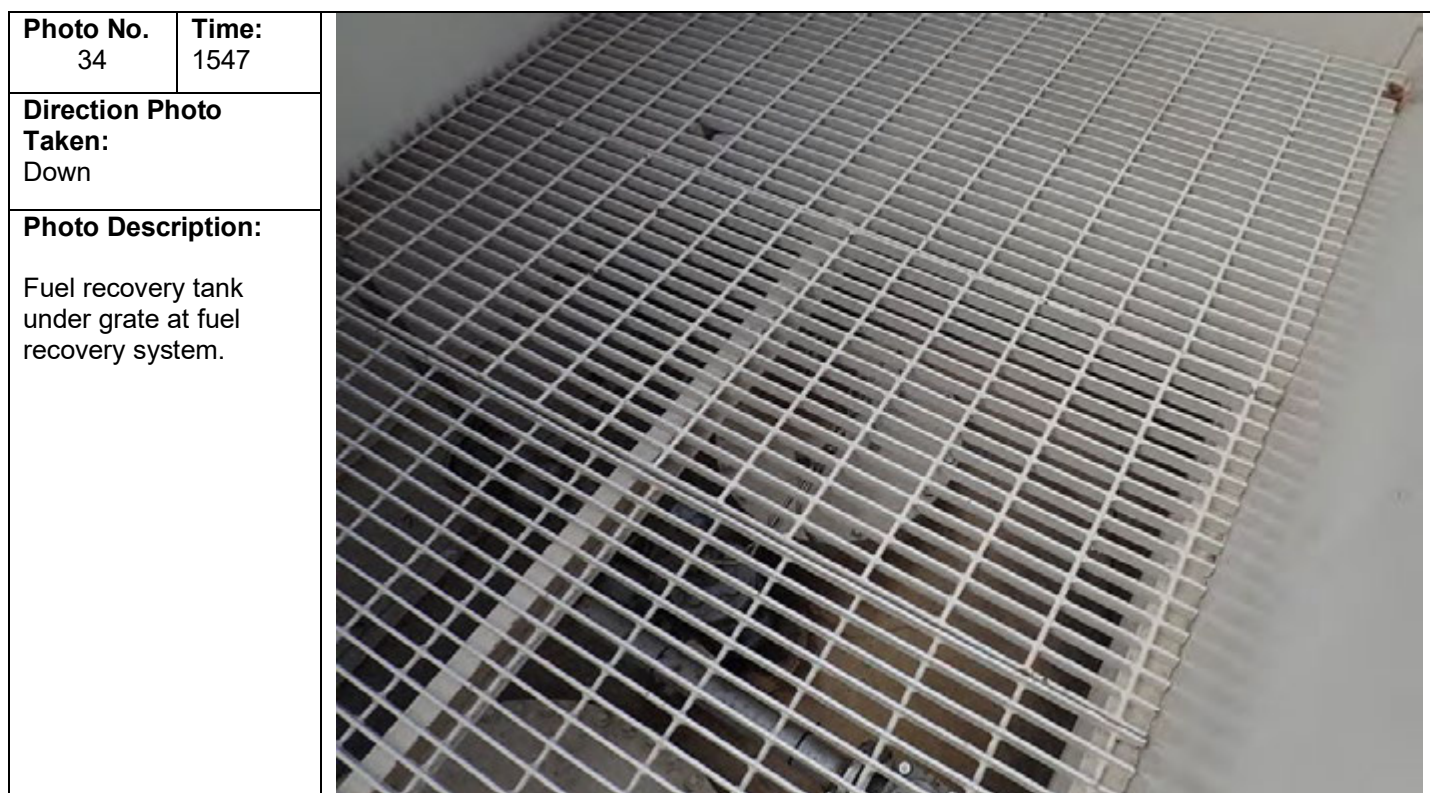
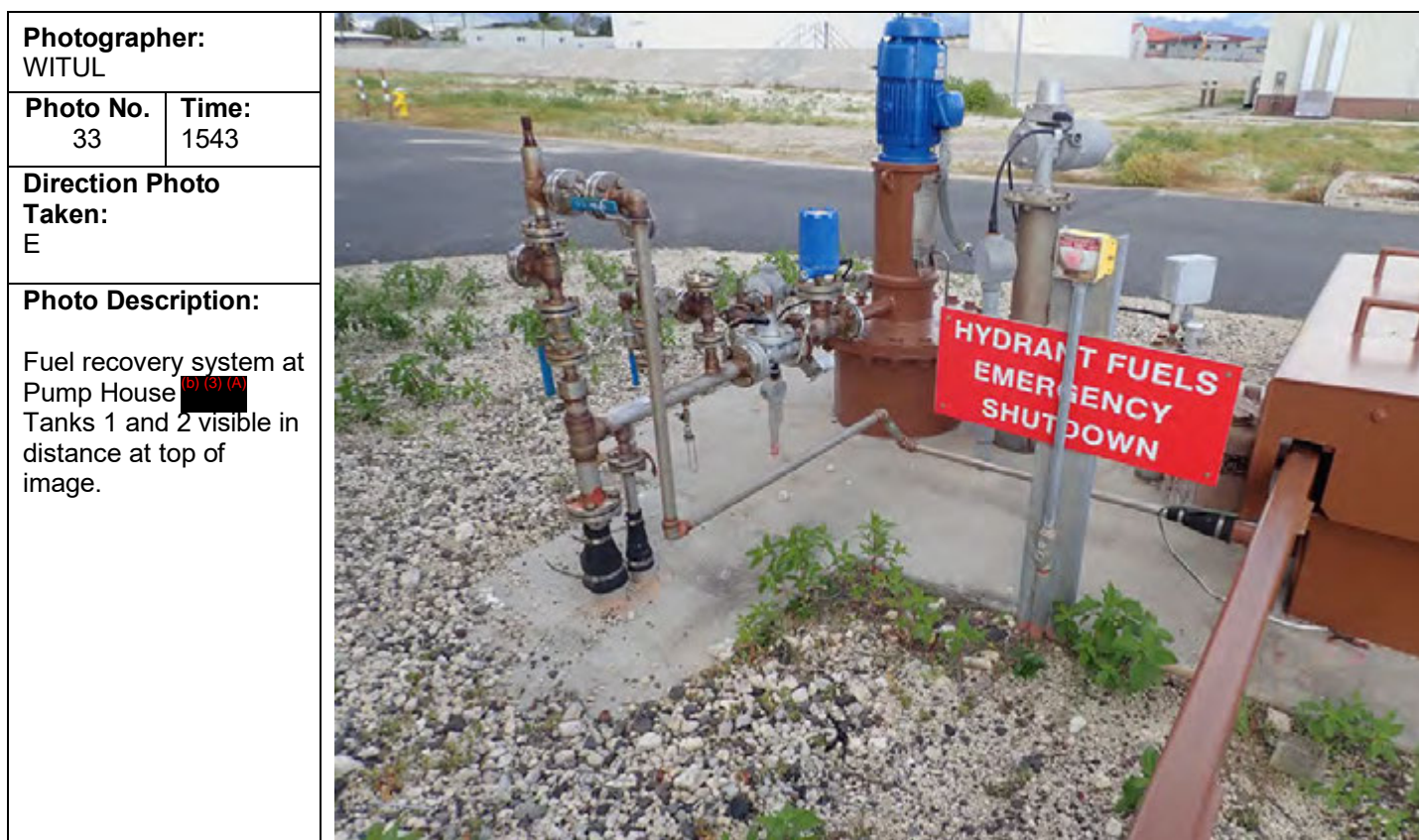


Photo No. 30	Time: 1535
Direction Photo Taken: Close-up	
Photo Description: Tank 4 valve with corrosion. Duplicate photo.	









Photographer: WITUL	
Photo No. 37	Time: 1549
Direction Photo Taken: NW	
Photo Description: Small pump used for fuel recovery from equipment. Fuel can be recovered to tank from Bowsers, and other mobile refuelers.	



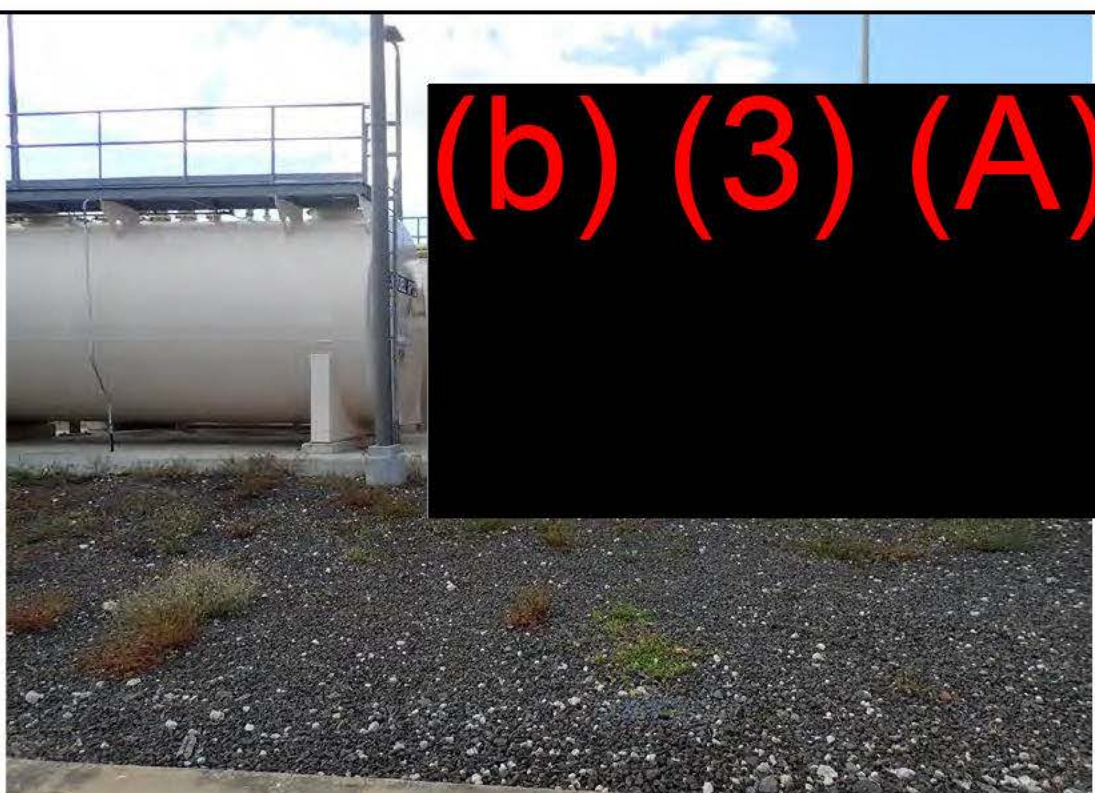
Photo No. 38	Time: 1550
Direction Photo Taken: Indoors	
Photo Description: Filters in Pump house, Bldg (b) (3) (A). Oil capacity of filters may be more than (b) (3) gallons, requiring them to be included in SPCC Plan.	



Photographer: WITUL	
Photo No. 39	Time: 1553
Direction Photo Taken: Close-up	
Photo Description: Label plates on filter in Pump House Bldg (b) (3) (A)	



Photo No. 40	Time: 1600
Direction Photo Taken: NW	
Photo Description: DFSP PH Airfield Area horizontal fuel tanks, piping, pumps, filters and loading racks. View from McClelland Street entrance.	



Photographer: WITUL	
Photo No. 41	Time: 1600
Direction Photo Taken: NNW	
Photo Description: L to R – (b) (3) (A)-gal jacketed diesel tanks FLC-2169-2 and FLC-2169-1; (b) (3) (A)-gal double walled JPTS tanks FLC-2169-3 and FLC-2169-4 at Area (b) (3) (A)	

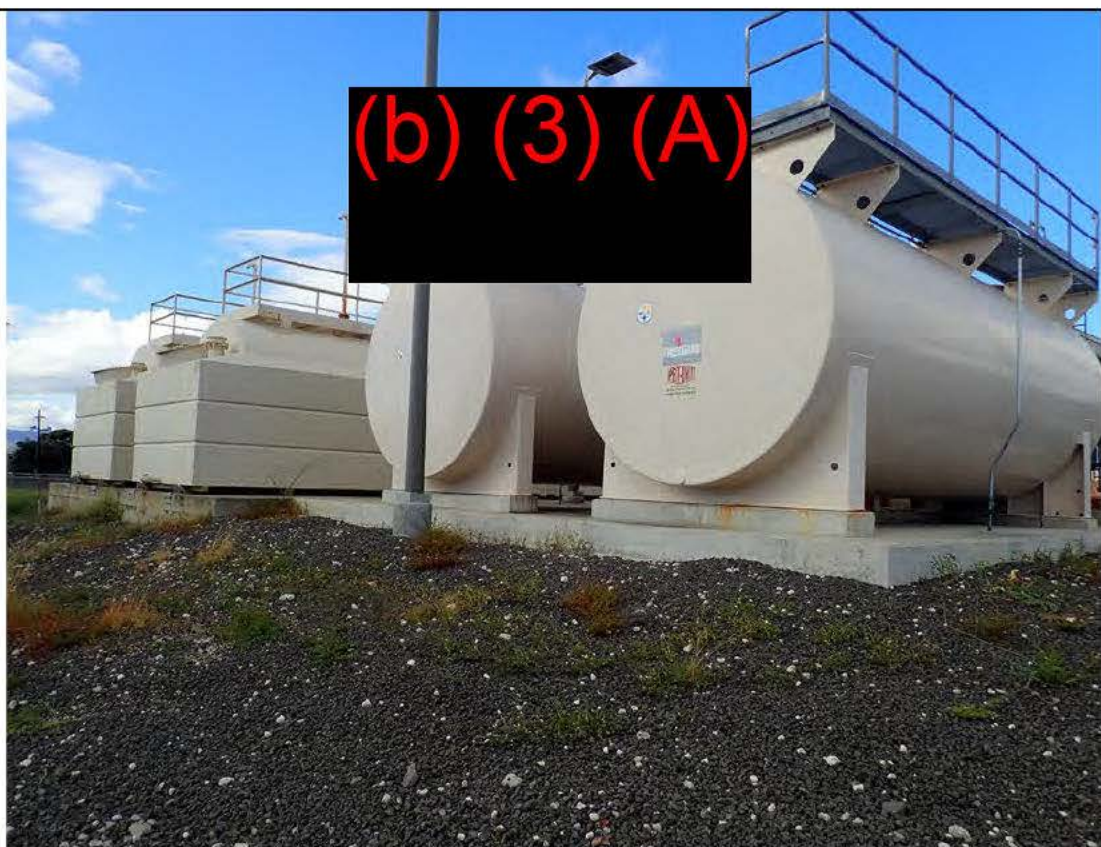
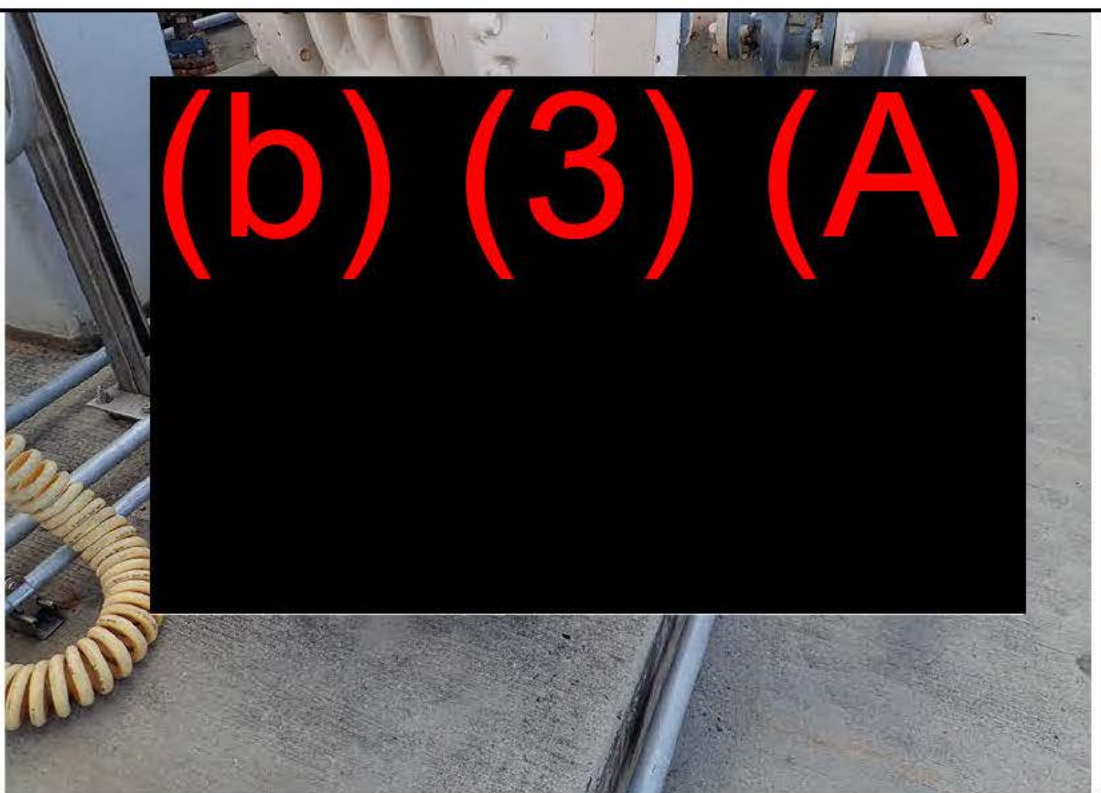
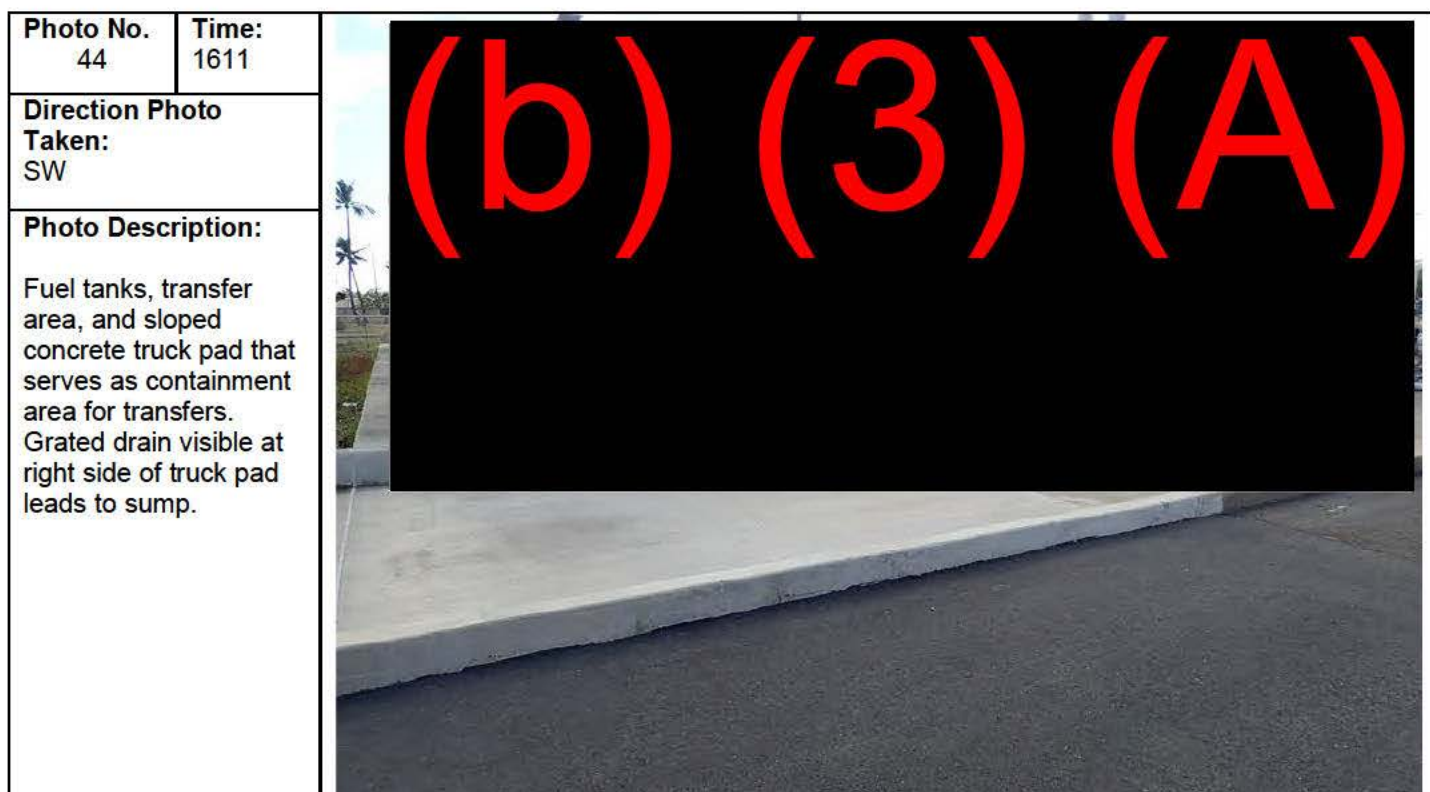
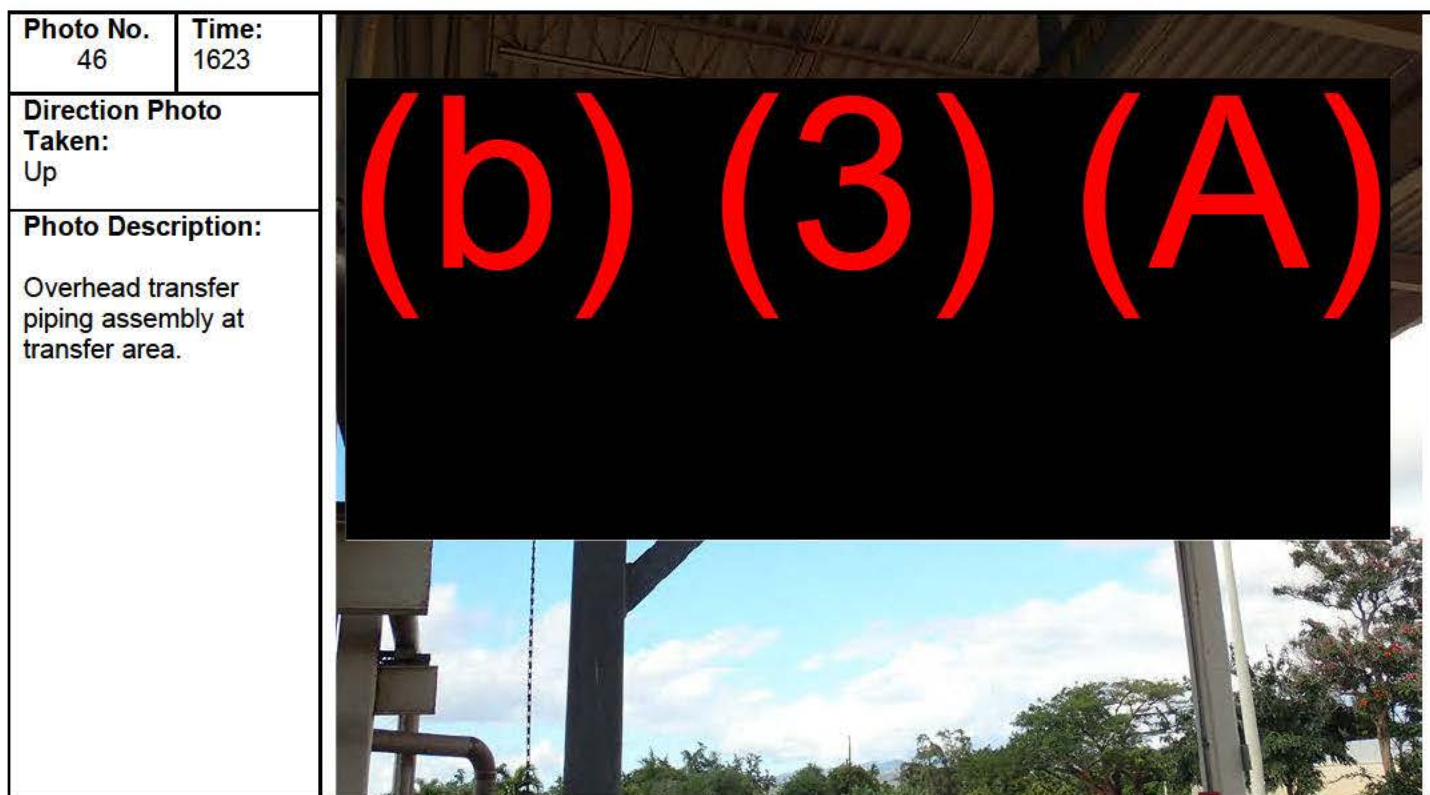
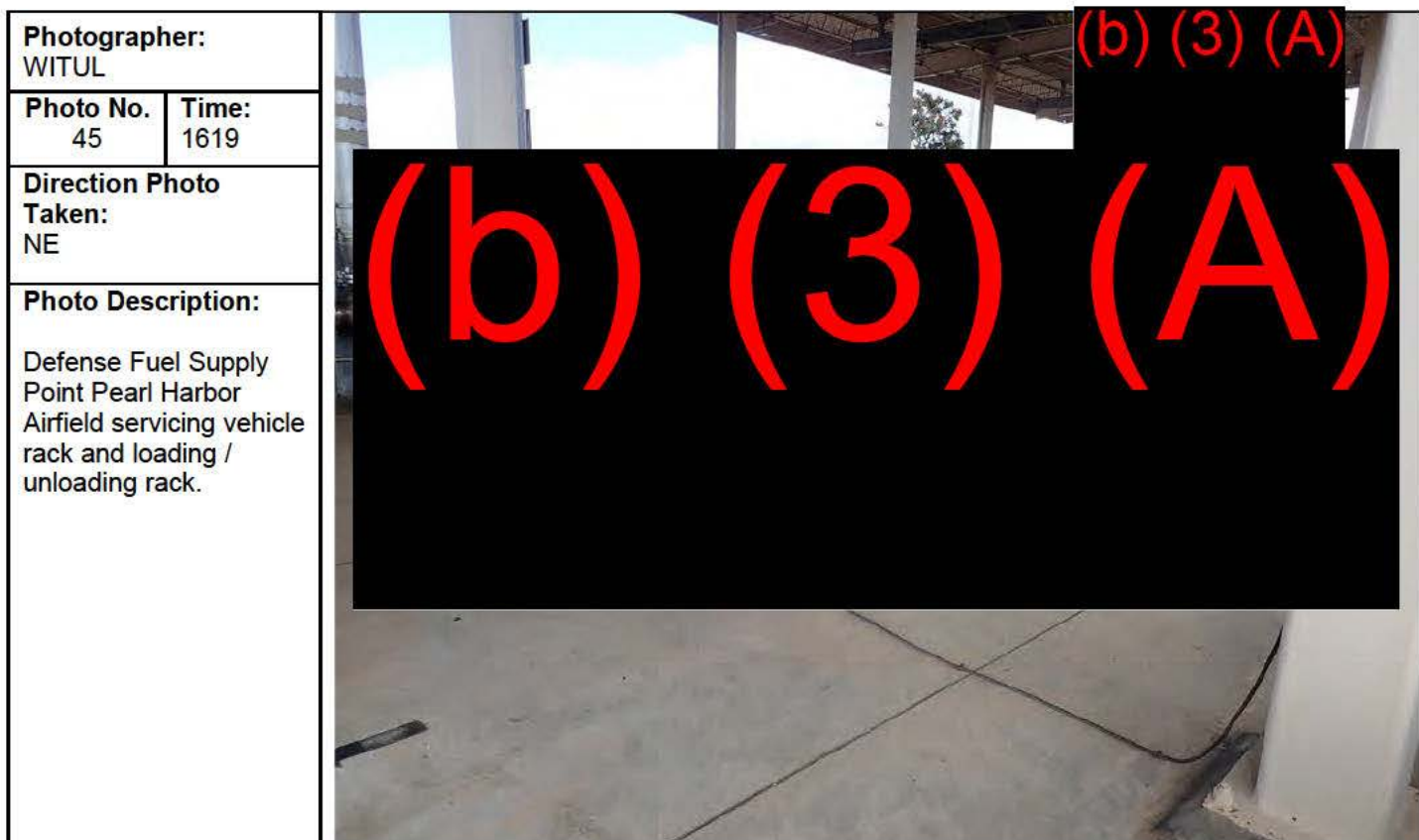
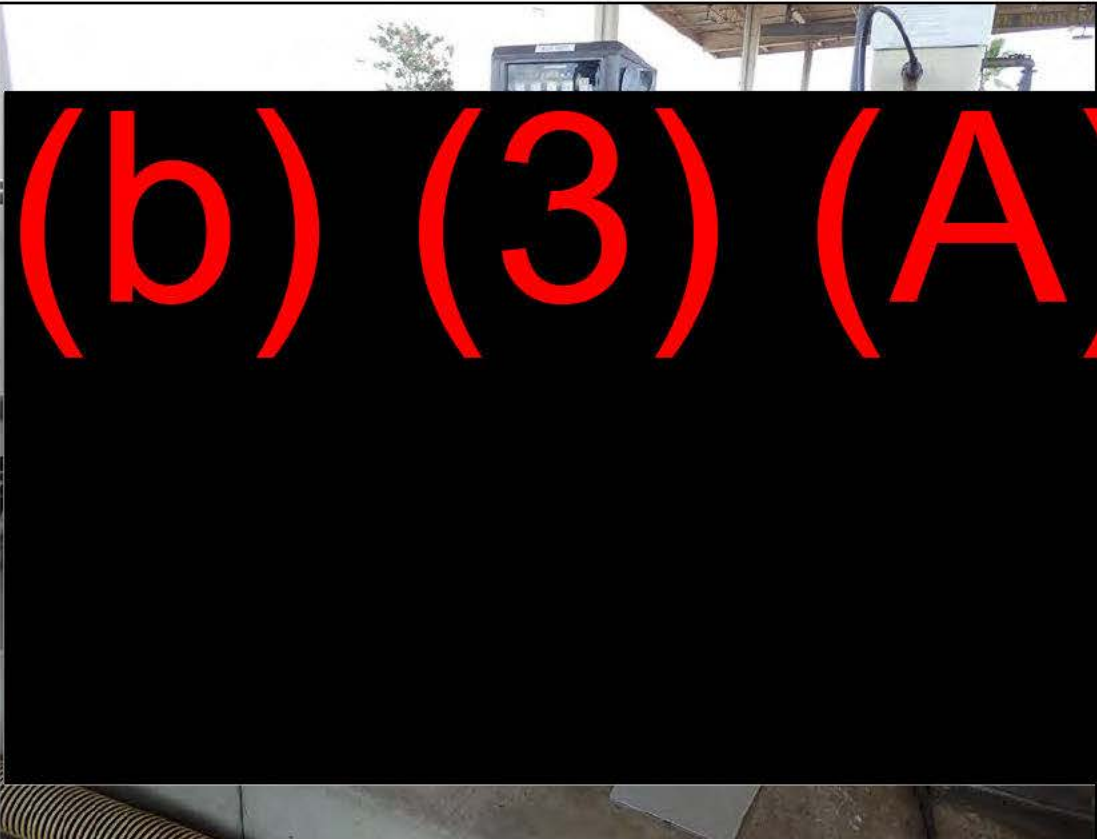


Photo No. 42	Time: 1605
Direction Photo Taken: W	
Photo Description: Transfer assembly with swing arm; loading/unloading rack for jacketed diesel tanks FLC-2169-1 and FLC-2169-2.	







Photographer: WITUL		
Photo No. 47	Time: 1626	
Direction Photo Taken: ENE		
Photo Description: Fueling Control Area at rack. Area drains lead to remote containment vault.		

U.S. Environmental Protection Agency
Region 9 Oil Program

SPCC PHOTOGRAPHIC LOG

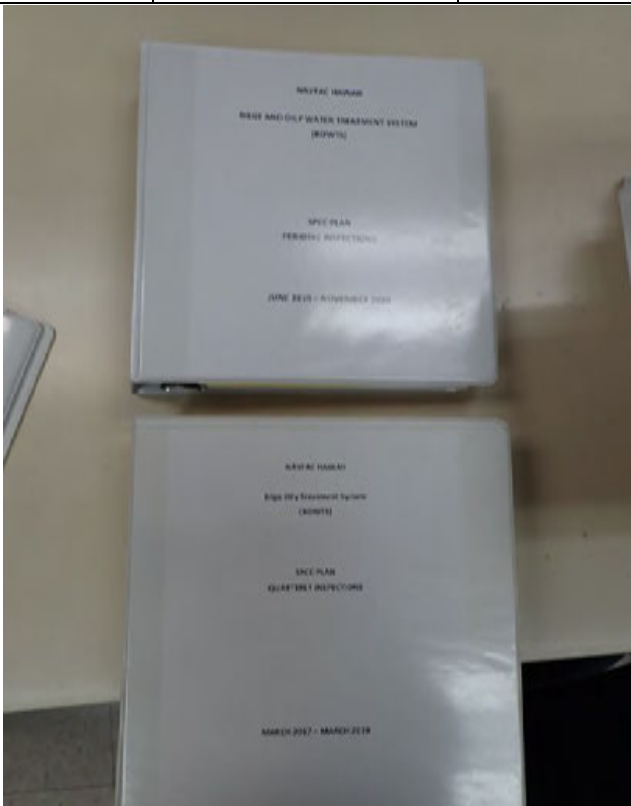
Facility Name & Location: Joint Base Pearl Harbor Hickam		Photographer: J Witul	Camera: Olympus Tough TG-5
Dates Photographs Were Taken: March 4, 2022			
Photo No. 1	Time: 1055		
Direction Photo Taken: Close-up			
Photo Description: Bilge and Oily Water Treatment System (BOWTS) inspection binders. Prior to 2020, inspections were performed on a quarterly basis (bottom binder), rather than monthly as required by industry standards.			

Photo No. 2	Time: 1113	
Direction Photo Taken: ENE		
Photo Description: Double-walled closed top Frac tanks. Oil from Tank A-4 separation tanks may be transferred to these tanks. Tank 81 and Tank 83 (at right of image) are (b) (3) (A) gallon tanks. Tank 77, partially visible in the background between Tanks 81 and 93, is a (b) (3) (A) AST.		


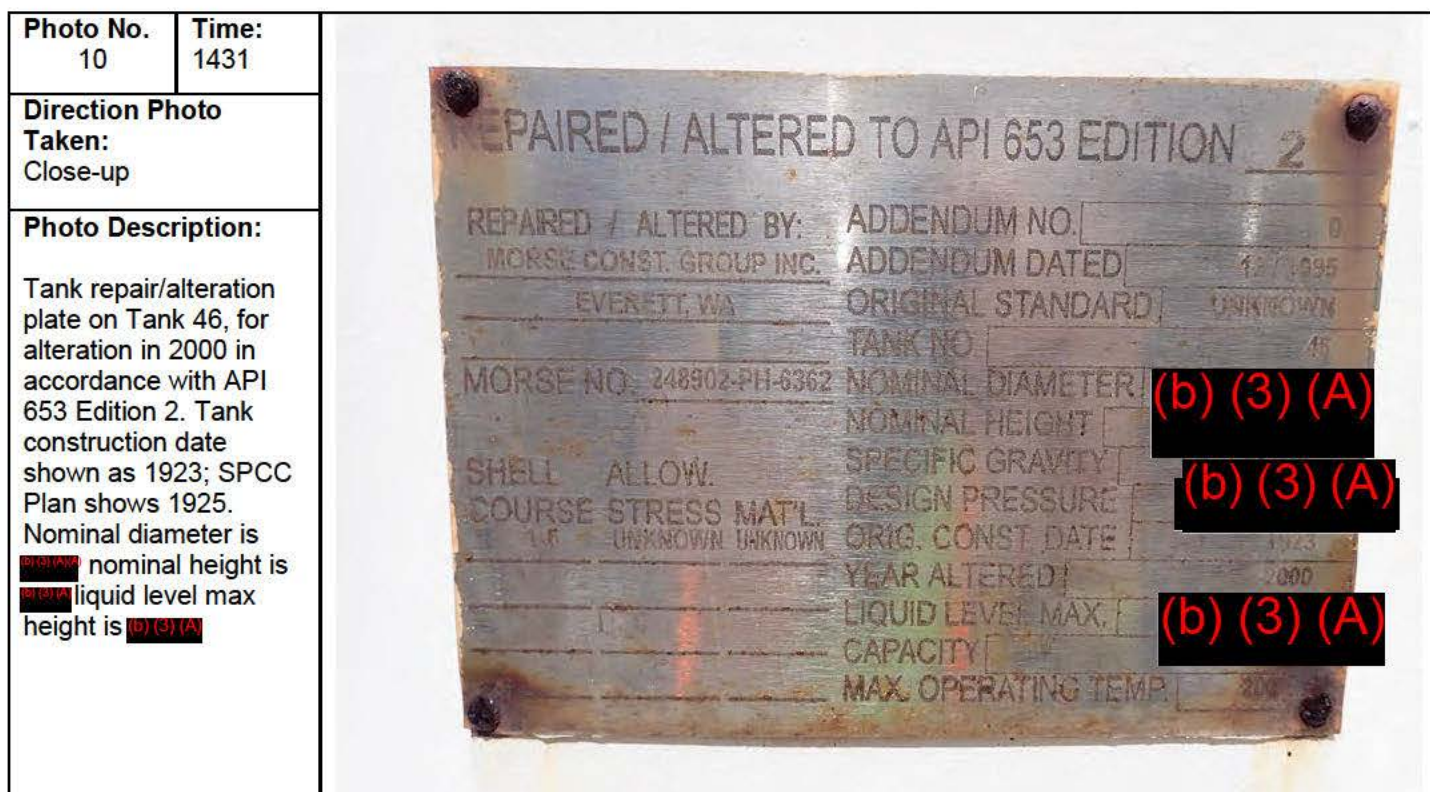
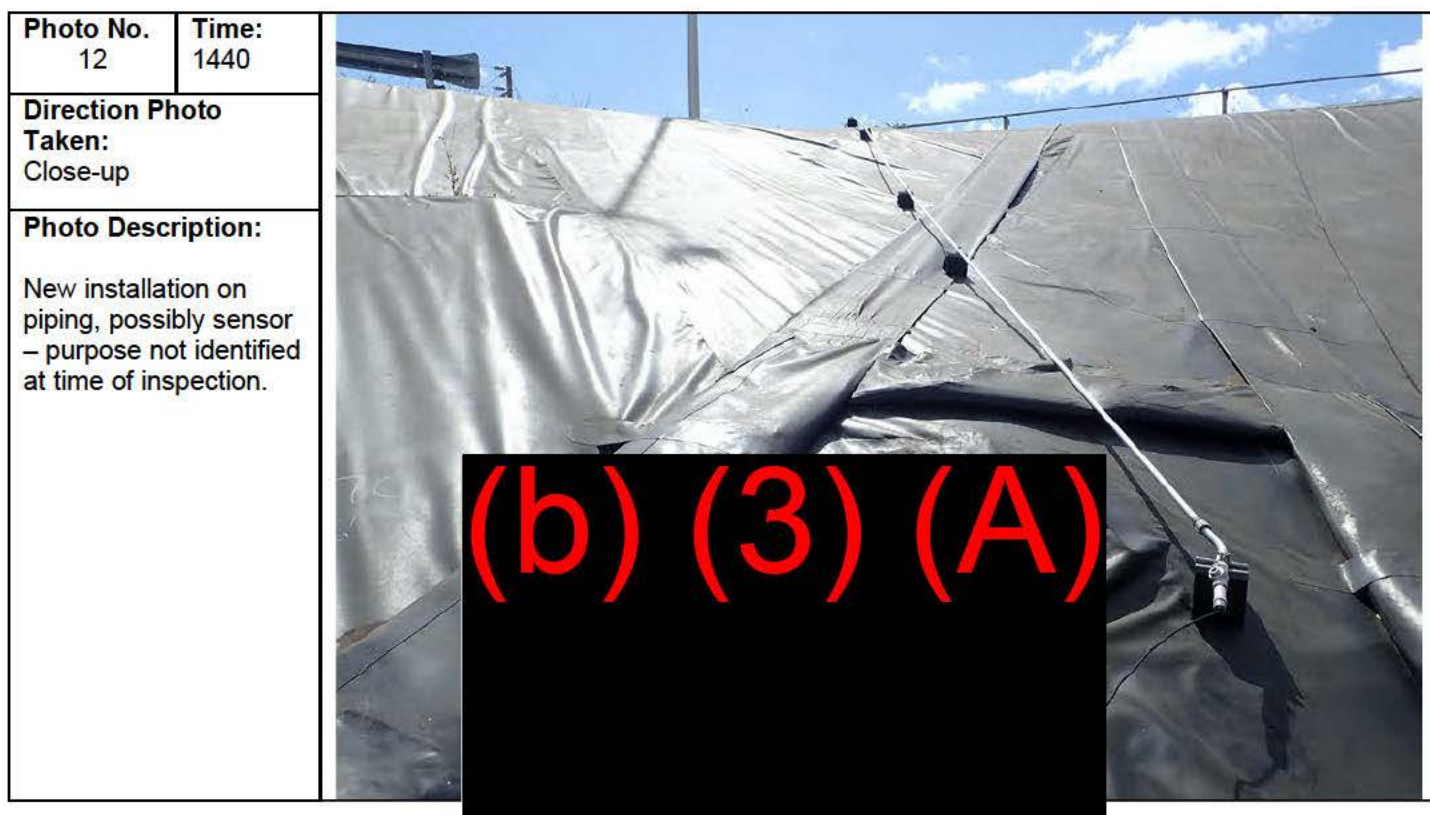
Photographer: WITUL		
Photo No. 3	Time: 1115	
Direction Photo Taken: Close-up		
Photo Description: Frac tank with drip from upper edge. With no overfill prevention, excess oil could also discharge from top of container.		

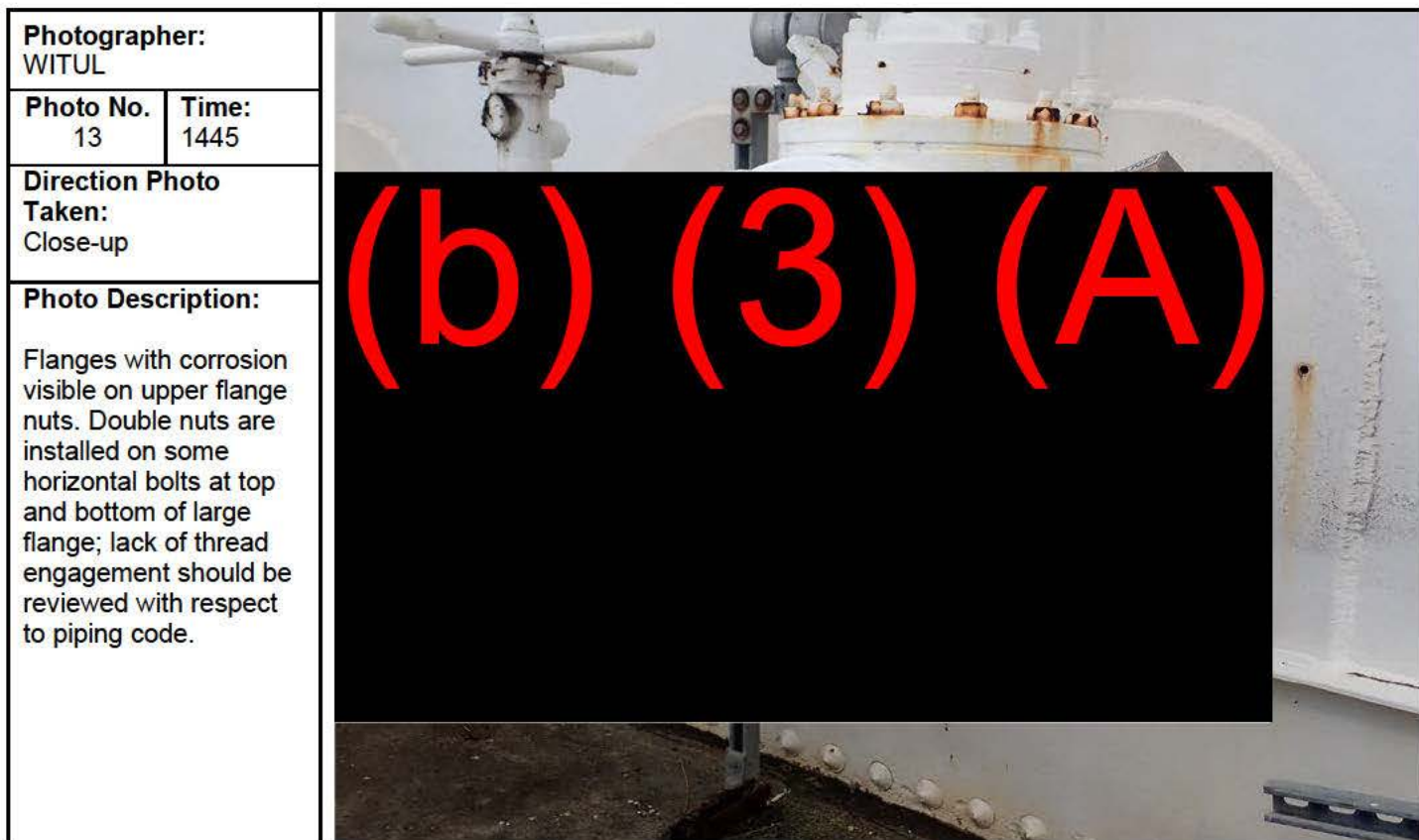
Photo No. 4	Time: 1116	
Direction Photo Taken: WSW		
Photo Description: Drainage direction from Frac tanks. Nearest storm drain is along street curb to right of fence line, in vicinity of black vehicle.		

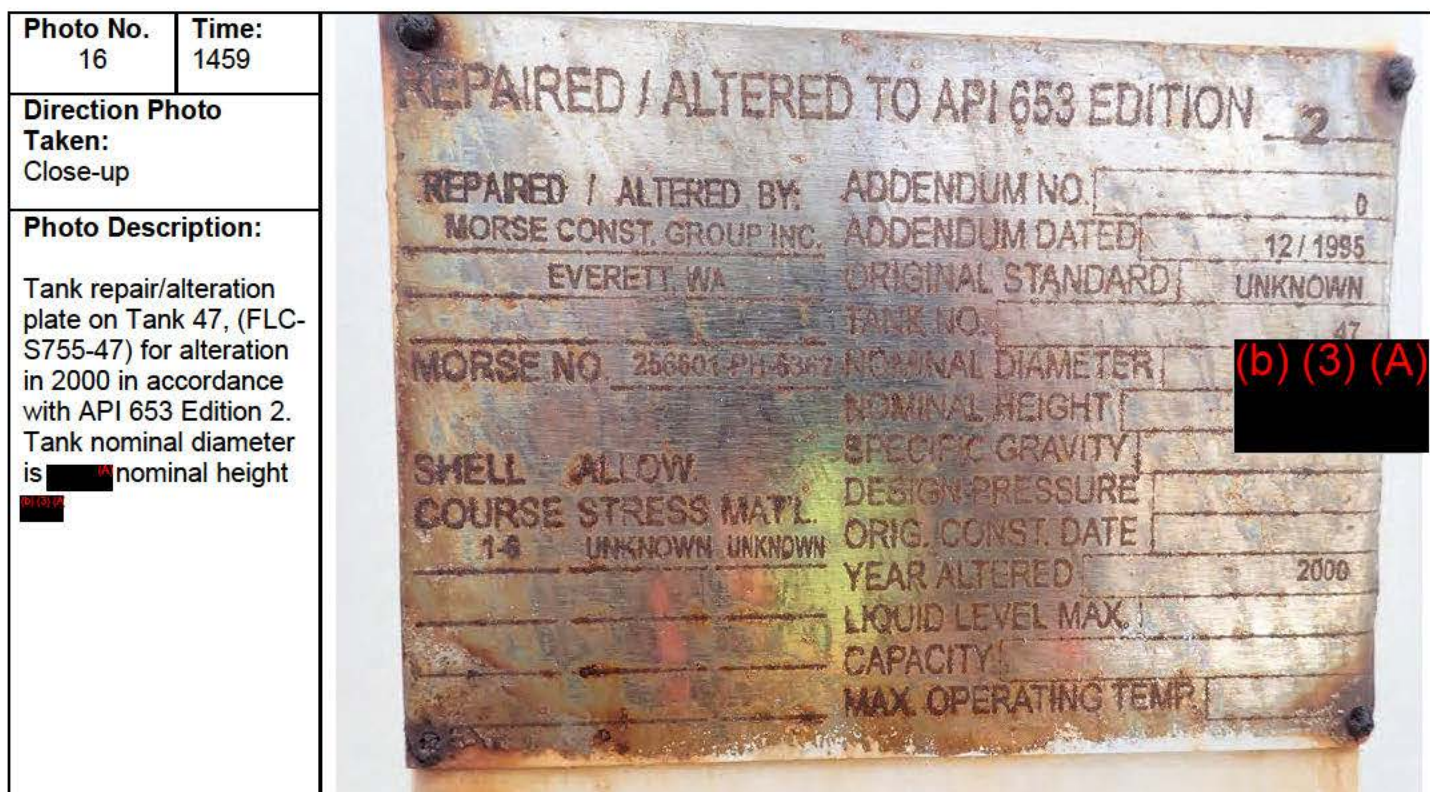
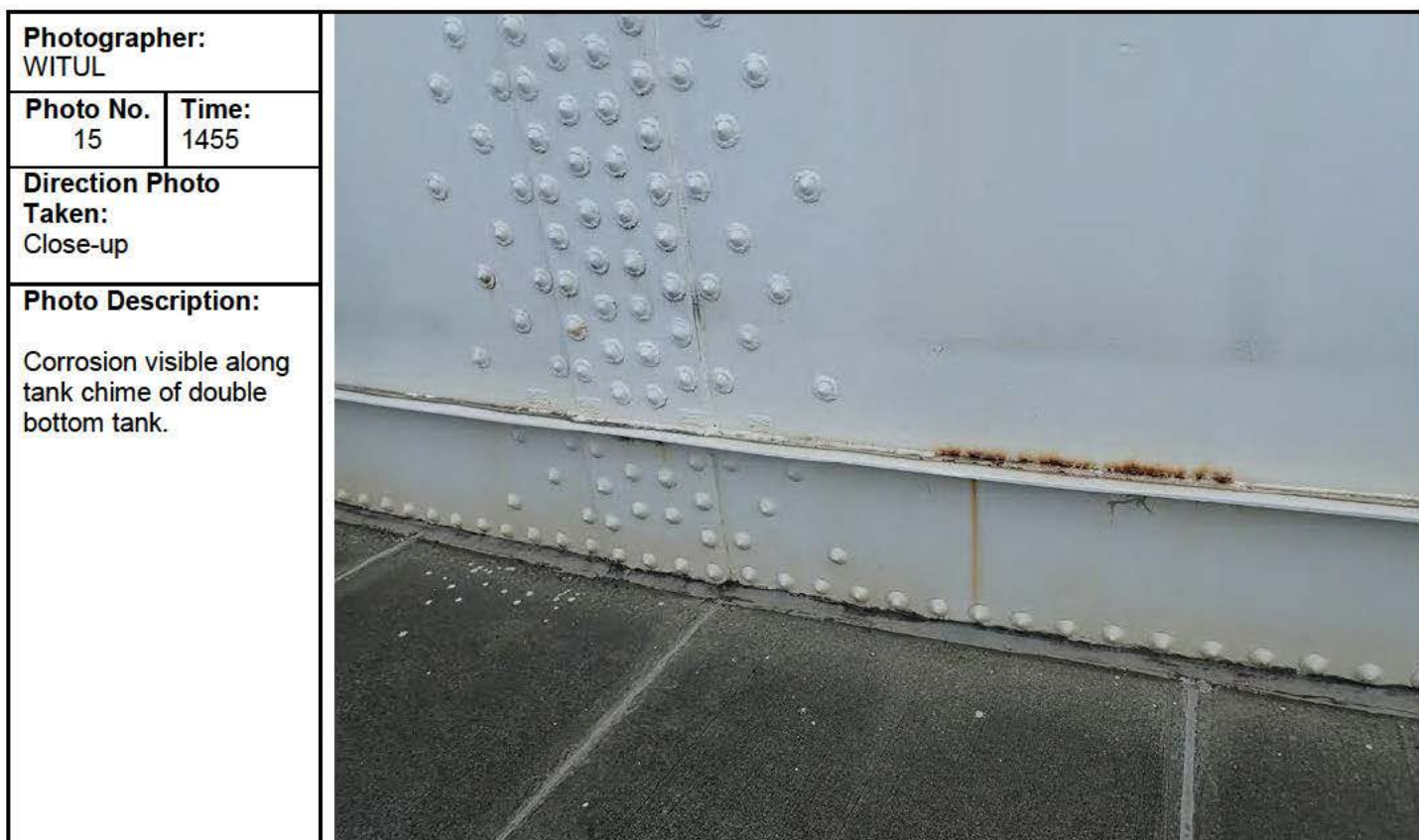












Photographer: WITUL		
Photo No. 17	Time: 1507	
Direction Photo Taken: E		
Photo Description: Tank 48 (FLC-S756-48) in foreground and Tank 55 (FLC-1751-55) in lined secondary containment areas at Upper Tank Farm.		

Photo No. 18	Time: 1509
Direction Photo Taken: Close-up	
Photo Description: Inspection and coating information on Tank 48. Formal out of service inspection in July 2007 in accordance with API 653. Mechanical repairs to tank bottom and roof in 2009 and 2010; interior and exterior coatings applied in 2011.	

Primary Contractor: Weston Solutions Inc.
API 653 out of service inspection Date: 23 JUL 2007, Technical Scanning Systems
Interior Cleaned: 21 MAY 2007, Pacific Commercial Services

Coating Contractor: Dunkin and Bush Inc.
2011- Interior coating system IAW UFGS 09 97 13.15 Surface prep SSPC SP 10 Profile: 2-3 mils
Primer: F-150 Thickness: 3-5 mils
Intermediate: F-152 Thickness: 3-5 mils
Topcoat: Fluoropolyurethane Thickness: 2-3 mils **Total thickness:** 8-13 mils

Thiokol Polysulfide: Applied to all rivet heads and seams

2011 - Exterior coating system IAW UFGS 09 97 13.27 Surface Prep SSPC SP 10
Primer: F-159 Thickness: 3-5 mils
Intermediate: F-152 Thickness: 3-5 mils
Topcoat: Polyurethane Thickness: 2-3 mils **Total thickness:** 8-13 mils

29 MAR 2009 Mechanical repairs: New Build Up Tank Bottom - Rockford
28 OCT 2010 Mechanical Repair: Roof and Support Structure - CB&I
Designers of Record: Pond Constructors Inc. and Enterprise Engineering Inc.

Commissioning Date: 23 MAY 2012

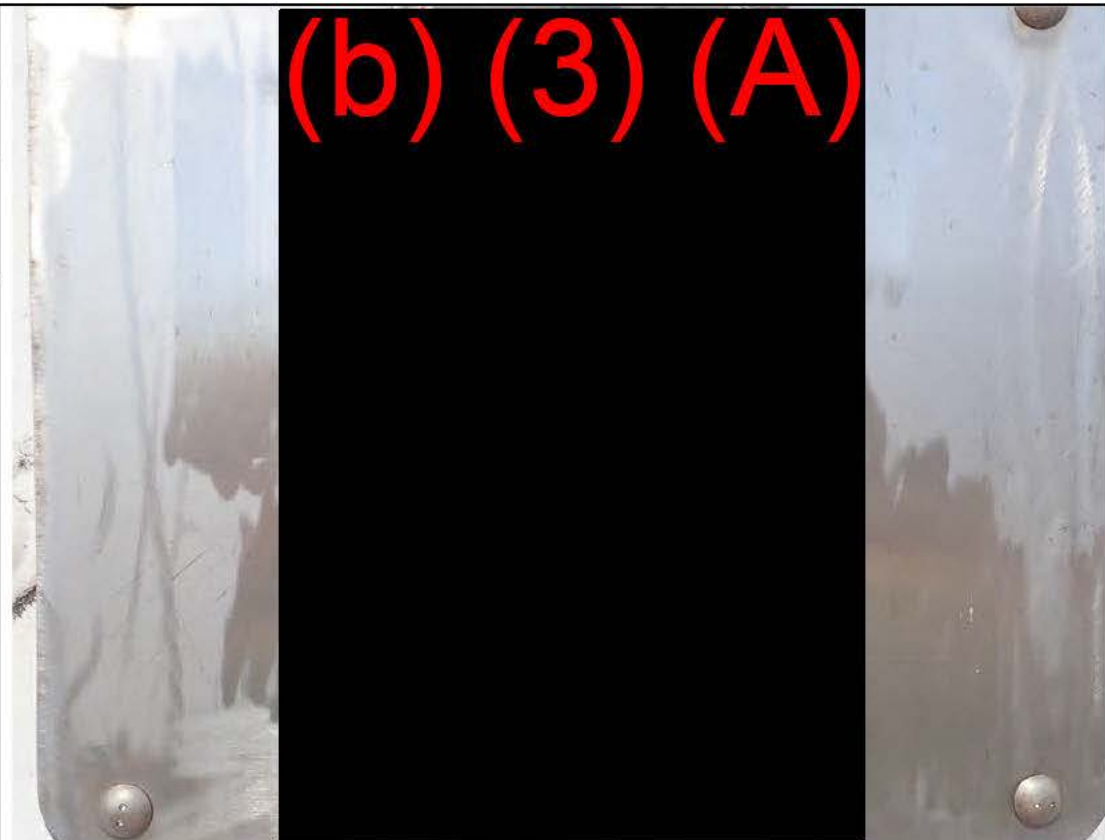
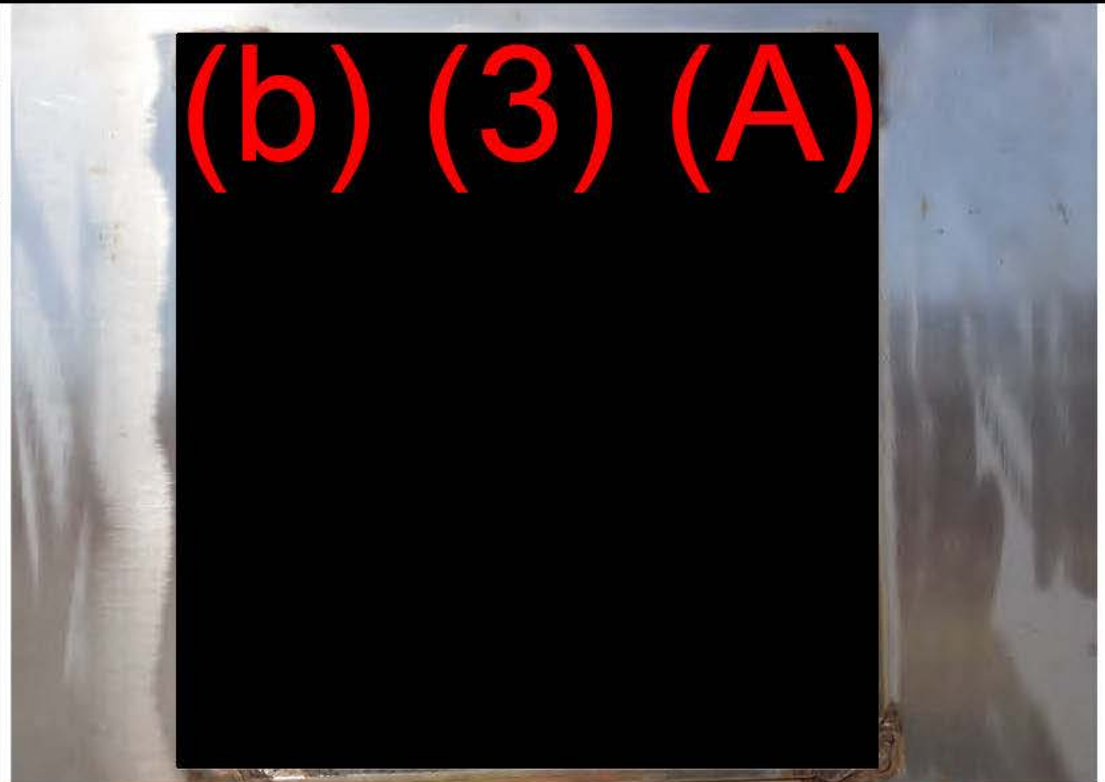
Photographer: WITUL		
Photo No. 19	Time: 1512	
Direction Photo Taken: Close-up		
Photo Description: Tank 48 label plates. Images not fully legible due to glare and wear of plates.		

Photo No. 20	Time: 1513	
Direction Photo Taken: Close-up		
Photo Description: Tank 48 label plate detail for tank modifications in 2008 to API 650 3 rd edition, including bottom with liner, leak detection and insert plate. Tank diameter (b) (3) (A), height (b) (3) (A) liquid level (b) (3) (A)		

Photographer: WITUL	
Photo No. 21	Time: 1513
Direction Photo Taken: Close-up	
Photo Description: Tank 48 label plate, image not fully legible due to glare and wear of plate.	

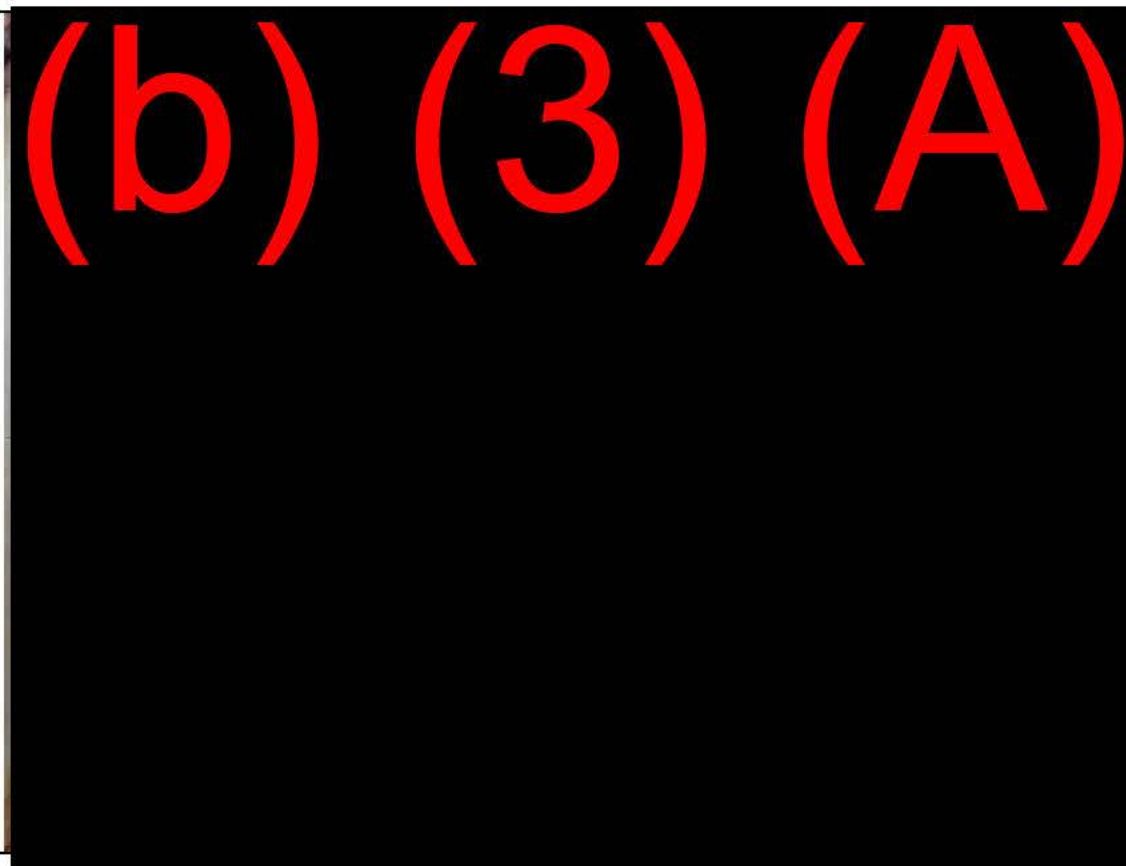


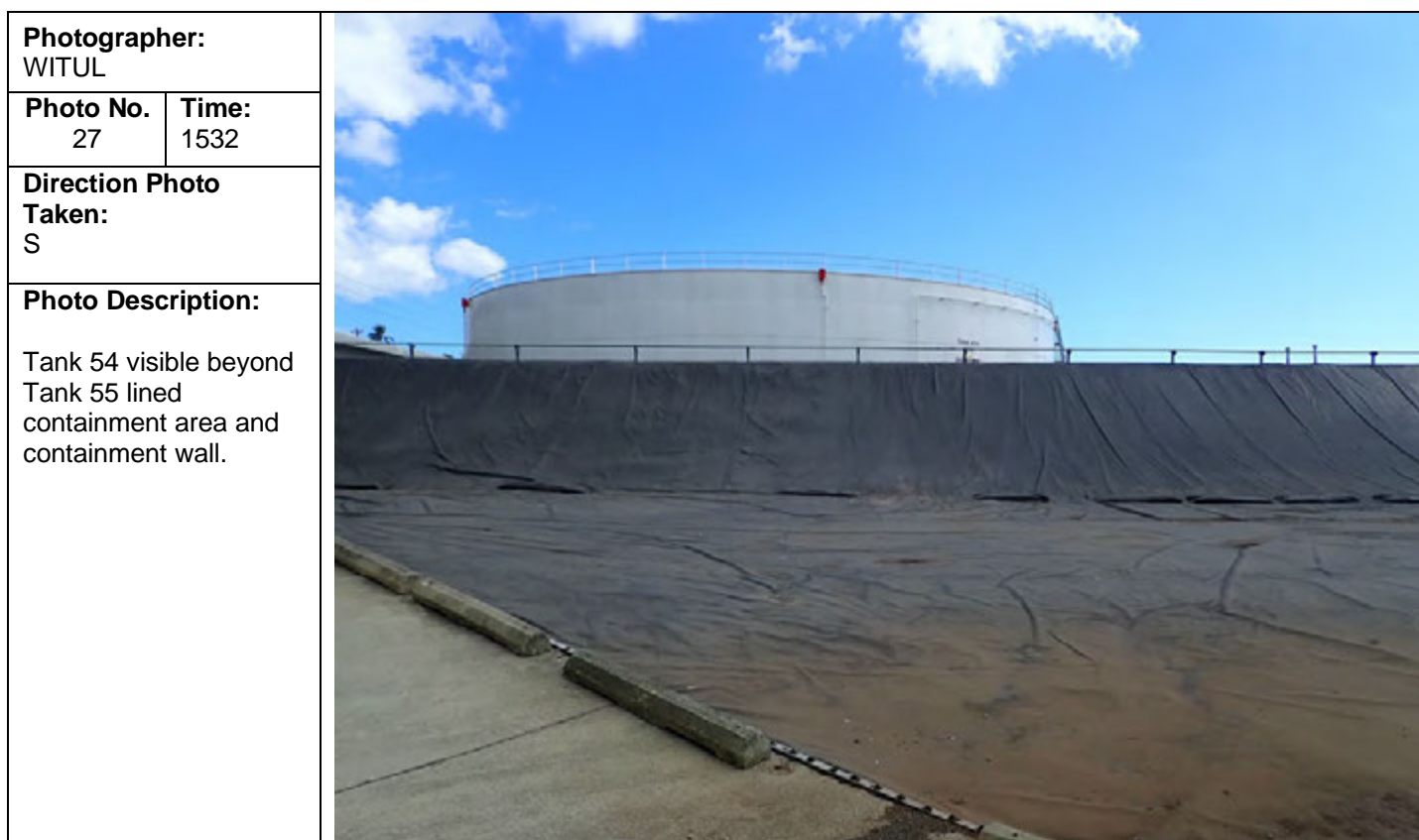
Photo No. 22	Time: 1514
Direction Photo Taken: Close-up	
Photo Description: Unsealed manway flange at tank currently undergoing cleaning, inspection, and repair.	





Photographer: WITUL		
Photo No. 25	Time: 1525	
Direction Photo Taken: Close-up		
Photo Description:		
<p>Tank 55 label plate for miscellaneous repair/alteration including water probe, completed in 2019 to API 653. Original construction date shown as 1978. Nominal diameter is (b) (3) (A) nominal height is (b) (3) (A) liquid level maximum (b) (3) (A)</p>		

Photo No. 26	Time: 1526	
Direction Photo Taken: Close-up		
Photo Description:		
<p>Tank 55 Chicago Bridge & Iron Company label plate, construction standard shown as 1977 edition of API 650.</p>		



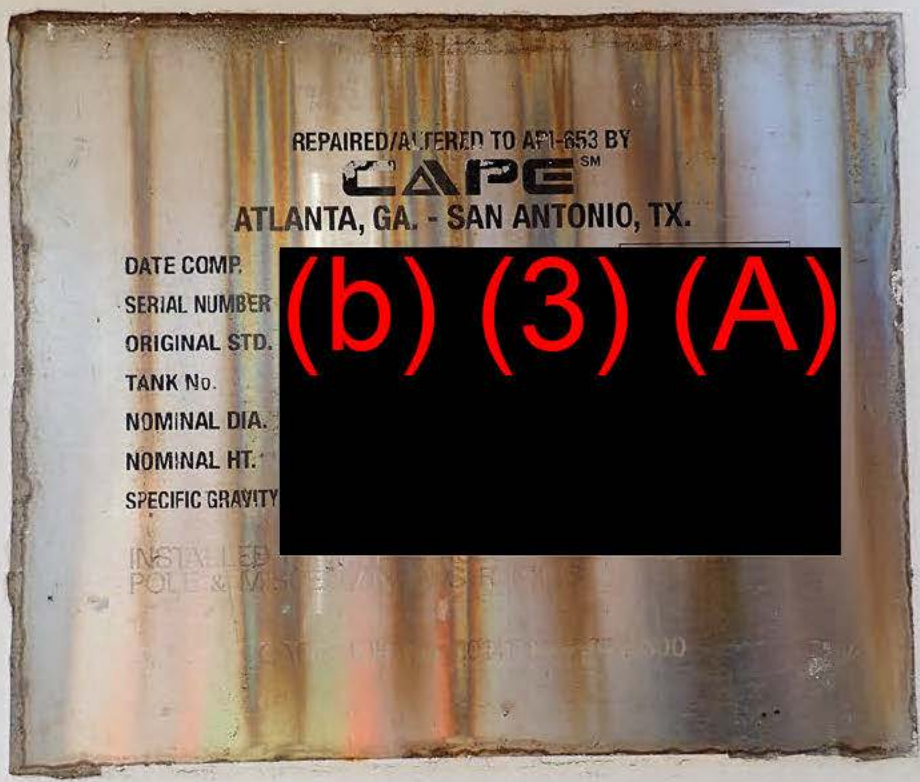
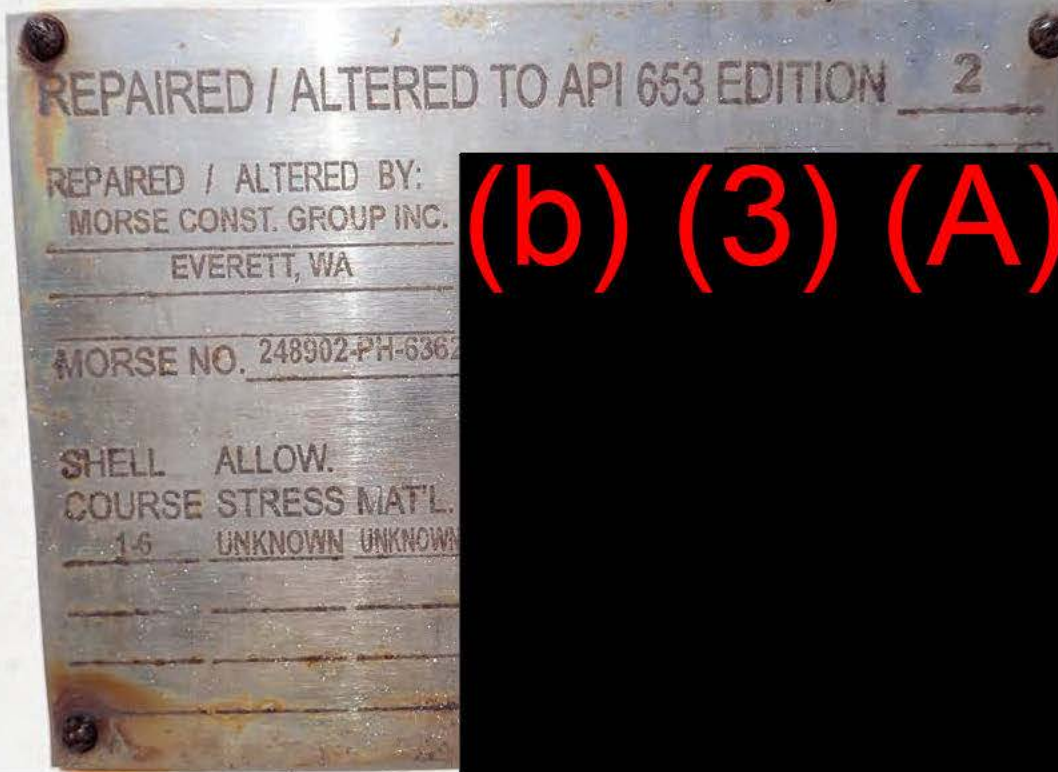
Photographer: WITUL		
Photo No. 29	Time: 1537	
Direction Photo Taken: Close-up		
Photo Description: Tank 54 label plate for miscellaneous repair/alteration including water probe, completed in 2019 to API 653 5 th Edition. Original construction date shown as 1925. Nominal diameter is (b) (3) (A) nominal height is (b) (3) (A)		

Photo No. 30	Time: 1545	
Direction Photo Taken: Close-up		
Photo Description: Tank 53 (FLC-S761-53) repair/alteration label plate for alterations in 2000, in accordance with API 653 Edition 2. Original construction date is 1923, nominal diameter (b) (3) (A) nominal height (b) (3) (A)		


Photographer: WITUL		<p style="text-align: center;">API 653 EXTERNAL INSPECTION - 24 JULY 2018 AUSTIN BROCKENBROUGH & ASSOC., LLP</p> 
Photo No. 31	Time: 1546	
Direction Photo Taken: Close-up		
Photo Description:		
Cleaning, Inspection and Repair information on Tank 53. API 653 In Service Inspection performed July 2018. Out Of Service inspection in December 2011. Repairs made in March 2013, Interior coating applied April 2013.		

Photo No. 32	Time: 1603	
Direction Photo Taken: N		
Photo Description: (b) (3) (A)-gallon Tanks B1 (FLC-S770-B-1) and B2 (FLC-S769-B-2) at Fuel Oil Reclamation Facility in concrete containment dike.		

Photographer: WITUL	
Photo No. 33	Time: 1604
Direction Photo Taken: N, Close-up	
Photo Description: Cleaning and repair information on Tank B1; latest shown is 2008.	



Photo No. 34	Time: 1604
Direction Photo Taken: NE	
Photo Description: Tank B2, out of service for cleaning, inspection, and repair.	



Photographer: WITUL	
Photo No. 35	Time: 1606
Direction Photo Taken: NE	
Photo Description: Piping at Fuel Oil Reclamation Facility. Rusty line in foreground is out of service.	



Photo No. 36	Time: 1609
Direction Photo Taken: Close-up	
Photo Description: Welded patches on tank; may be where appurtenances were removed, or other repairs.	



Photographer: WITUL	
Photo No. 37	Time: 1614
Direction Photo Taken: NE	
Photo Description: Tank FLC-1811 double-walled dual compartment turbine lube oil tank, and loading/unloading rack. Tank compartment capacities are (b) (3) (A) gallons and (b) (3) (A) gallons.	



Photo No. 38	Time: 1615
Direction Photo Taken: SSE	
Photo Description: Tank FLC-1812 double-walled dual compartment engine lube oil tank, and loading/unloading rack. Tank compartment capacities are (b) (3) (A) gallons and (b) (3) (A) gallons.	



Photographer: WITUL	
Photo No. 39	Time: 1616
Direction Photo Taken: SSE	
Photo Description: Piping north of Adit entrance.	

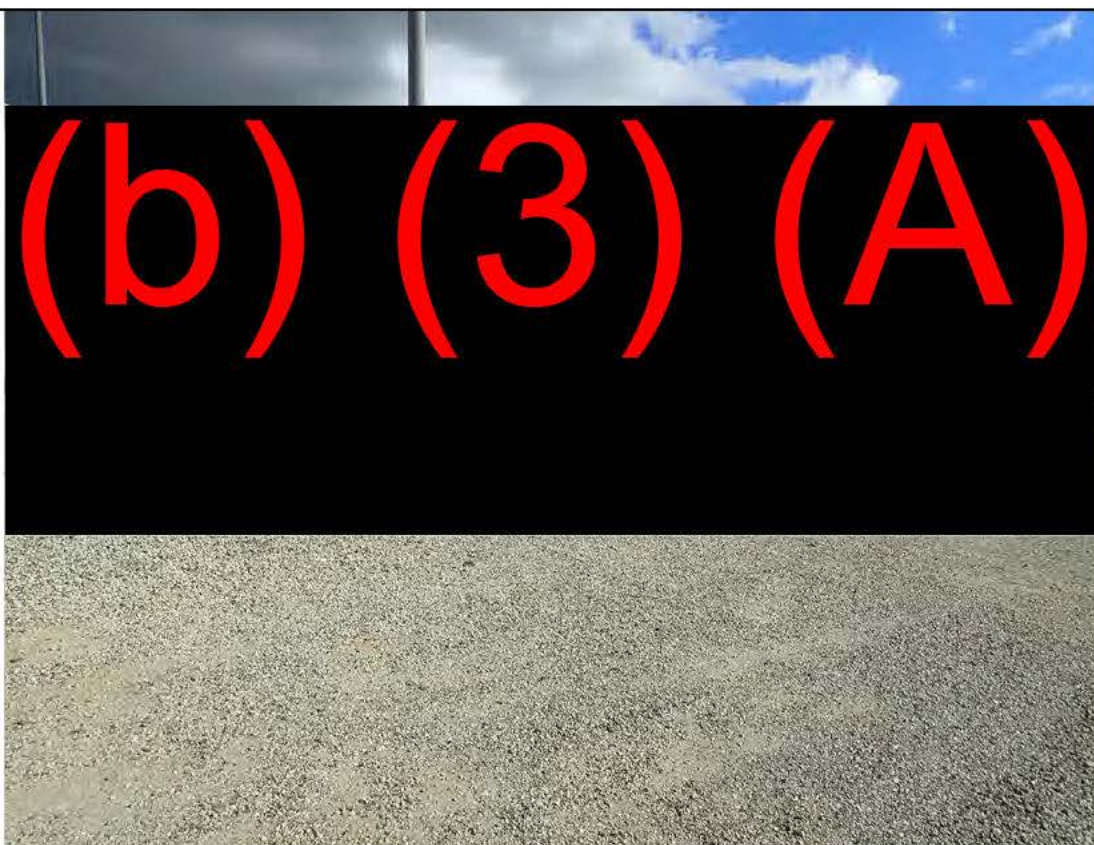


Photo No. 40	Time: 1617
Direction Photo Taken: SW	
Photo Description: (b) (3) (A)-gallon Tank 301 (FLC-S660-301). Tank can store fuel flushed from commercial refinery multiproduct pipeline.	



Photographer: WITUL	
Photo No. 41	Time: 1618
Direction Photo Taken: Close-up	
Photo Description: Tank 301 label plate. Constructed in 2007 to API Standard 650, 10 th edition. Nominal tank diameter is (b) (3) (A) meters, nominal height (b) (3) (A) meters.	

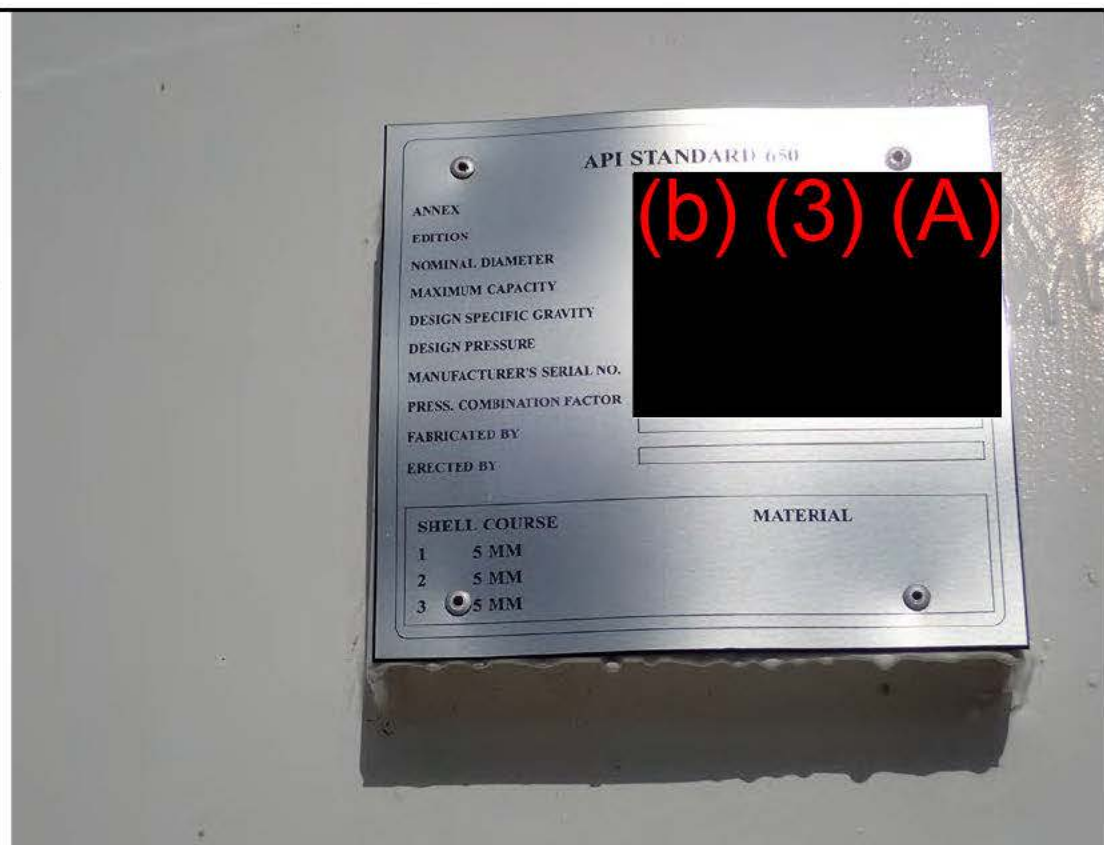
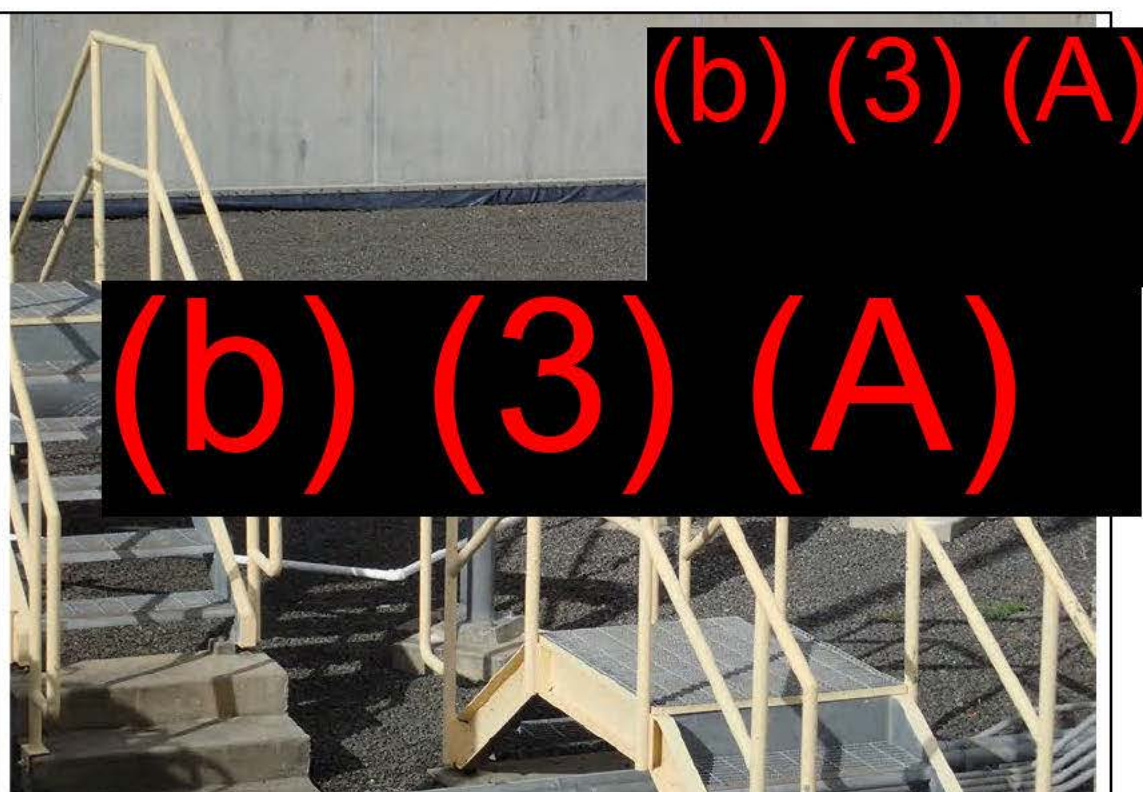


Photo No. 42	Time: 1619
Direction Photo Taken: NE	
Photo Description: Piping and containment area, Tank 301. Walled concrete containment area has aggregate over liner.	



Photographer: WITUL	
Photo No. 43	Time: 1621
Direction Photo Taken: NE	
Photo Description: Fuel piping and drainage channel (b) (3) (A) of Tanks 1811, 1812 and truck rack.	

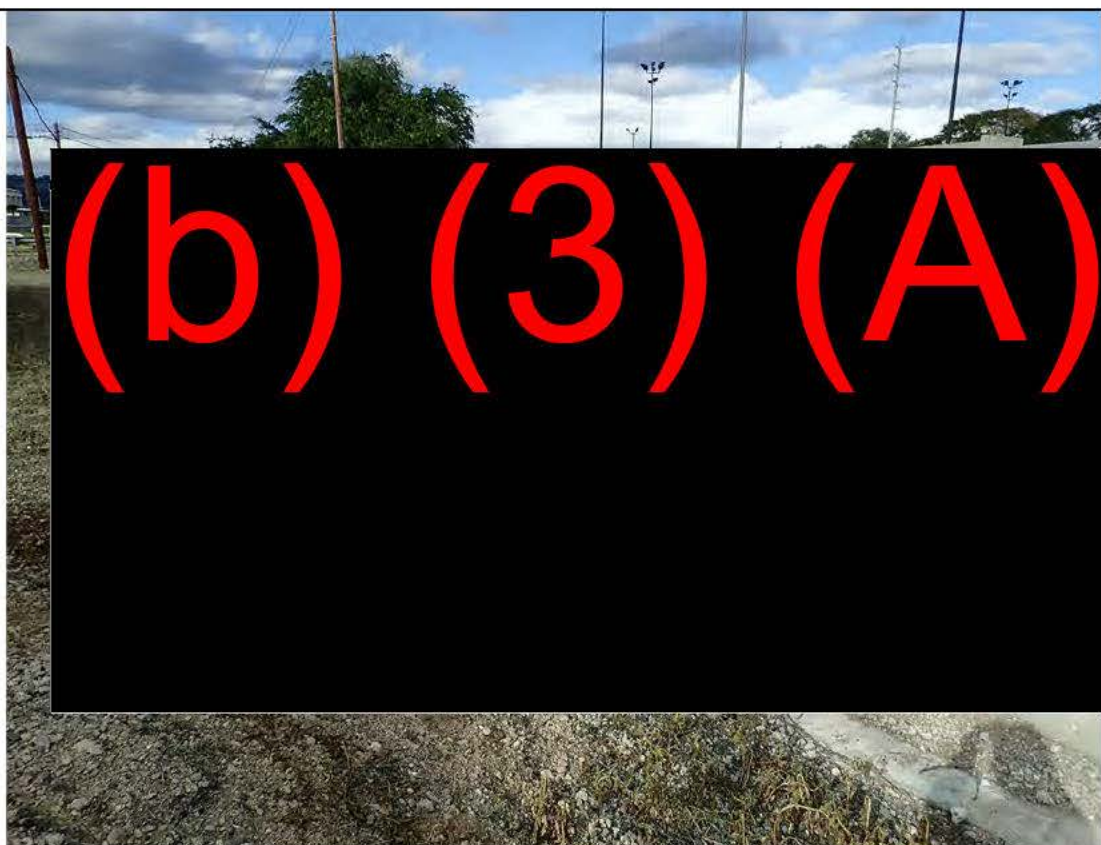
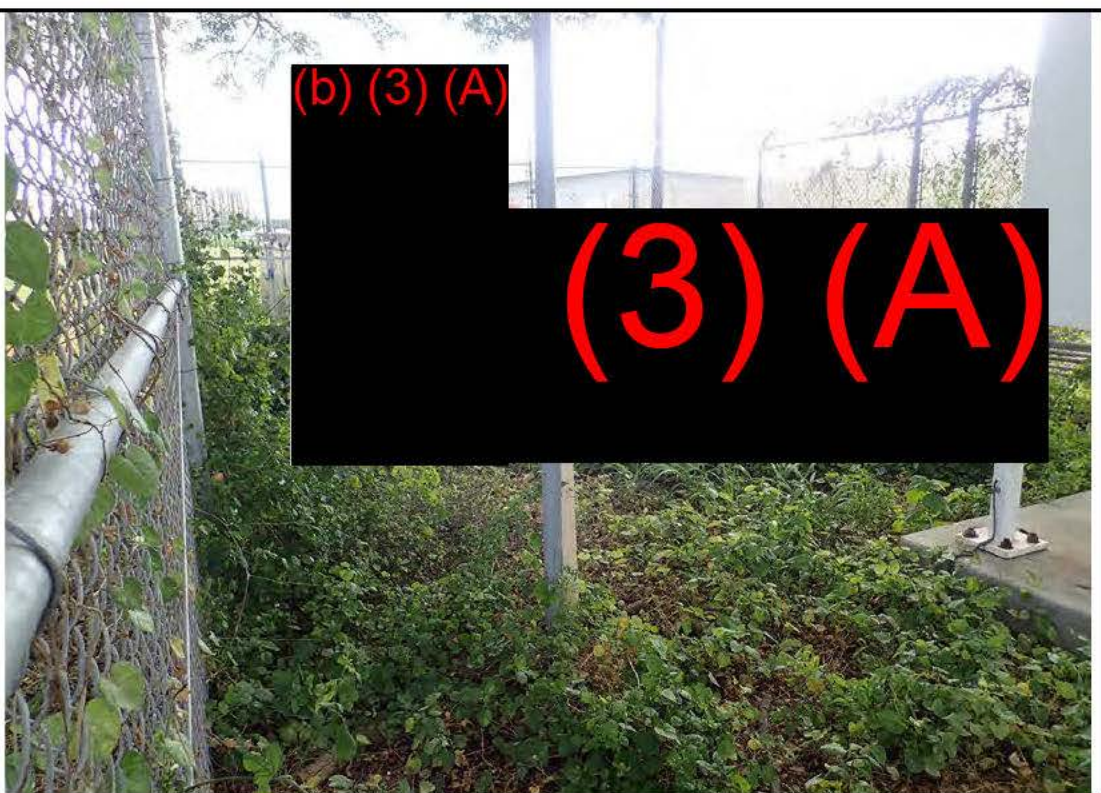



Photo No. 44	Time: 1628
Direction Photo Taken: SSW	
Photo Description: DOT/EPA jurisdictional boundary for pipeline, inside fenced/gated area.	



e

Photographer: WITUL			
Photo No. 45	Time: 1628		
Direction Photo Taken: SSW			
Photo Description: Stream/culvert alongside pipeline jurisdictional boundary			