

**Final U.S. Environmental Protection Agency Tier I
Qualified Facility Spill Prevention, Control, and
Countermeasure Plan
Remediation of Operable Units 1 and 2
Former Harshaw Chemical Company Site – Cleveland, Ohio**

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May 2024

Prepared for:



USACE Buffalo District

478 Main Street
Buffalo, New York 14207

Prepared by:



Enviro-Fix Solutions LLC

1240 Bayshore Highway, Suite 311

Burlingame, California 94010

Phone: 650-347-1555 / Fax: 650-347-8789

Email: corporate@ecc.net



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ACRONYMS AND ABBREVIATIONS

BOP	Blowout Prevention
CFR	<i>Code of Federal Regulations</i>
EFS	Enviro-Fix Solutions LLC
EPA	U.S. Environmental Protection Agency
FUSRAP	Formerly Utilized Sites Remedial Action Program
HCCS	Former Harshaw Chemical Company Site
ITR	internal technical review
NCP	National Contingency Plan
NRC	National Response Center
RA	Regional Administrator
SOP	<i>Site Operations Plan</i>
SOW	<i>Final Scope of Work, Remediation of Remediation of Operable Units 1 & 2</i>
SPCC	Spill Prevention, Control, and Countermeasure Plan
UFGS	Unified Facilities Guide Specification

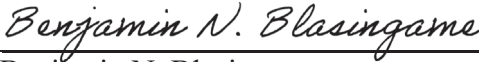


SIGNATURES


This Final U.S. Environmental Protection Agency Tier I Qualified Facility SPCC Plan has been prepared by Enviro-Fix Solutions Limited Liability Corporation (EFS) to describe the plan for providing spill response materials for the Former Harshaw Chemical Company Site (HCCS) Remediation of Operable Units 1 and 2, Cleveland, Ohio, in accordance with the Unified Facilities Guide Specifications (UFGS) 01 45 00.00 10 QUALITY CONTROL.

EFS is committed to providing products and services to its clients that consistently meet or exceed their requirements. This is accomplished through a clearly communicated quality objective that establishes a plan and expectations for effective management of daily site operations. All staff and subcontractors are responsible for ensuring the quality of their work meets our established Quality Control (QC) criteria. All managers and employees are responsible for continual improvement in the products and services provided, for identifying and eliminating poor work products and deliverables, and for applying appropriate QC and processes to achieve these requirements.

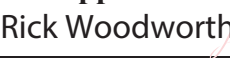
Plan Preparer:

	5/8/2024	412-429-2324
Benjamin N. Blasingame	Date	Phone
Project Manager III		

Plan Concurrence:

	5/9/2024	716-465-7811
Jason Hubler	Date	Phone
Senior Radiological Engineer		

Plan Approval:

 <small>Digitally signed by Rick Woodworth Date: 2024.05.09 07:51:45 -04'00'</small>	5/9/2024	215-776-0629
Rick Woodworth	Date	Phone
Sr. Project Manager		



U.S. ENVIRONMENTAL PROTECTION AGENCY TIER I QUALIFIED FACILITY SPCC PLAN

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name Former Harshaw Chemical Company Site

Facility Address 1000 Harvard Avenue

City Cleveland State Ohio ZIP 44109
(215) 776 – 0629

County Cuyahoga Tel. Number (Rick Woodworth, Project Manager)

Owner or Operator Name Enviro-Fix Solutions LLC

Owner or Operator Address 1240 Bayshore Highway

City Burlingame State California ZIP 94010

County San Mateo Tel. Number (650) 347 - 1555

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I Rick Woodworth certify that the following is accurate:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
 - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
 - a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
 - b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
 - c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature Rick Woodworth
Digitally signed by Rick Woodworth
Date: 2024.05.09 07:51:17 -04'00'
 Name Rick Woodworth

Title: Project Manager
 Date: 5 / 9 / 2024

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	<input checked="" type="checkbox"/>
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. [§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	<input checked="" type="checkbox"/>

The proposed construction site layout is shown on Figure 1.

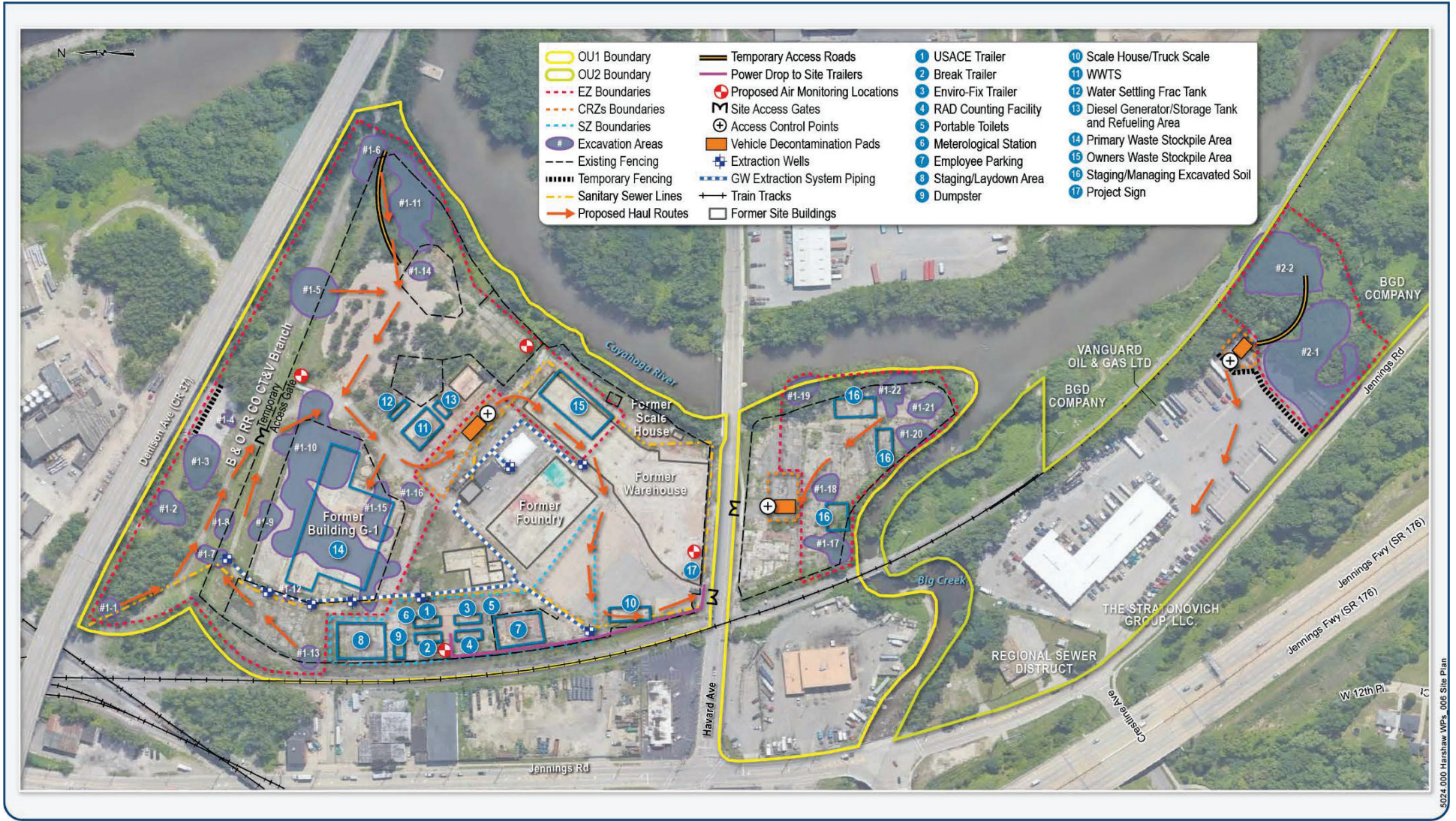


Figure 1 – Construction Site Layout

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities		
This table includes a complete list of all oil storage containers (aboveground containers ^a and completely buried tanks ^b) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.		<input type="checkbox"/>
Oil Storage Container (indicate whether aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (gallons)
A – portable cube fuel cell, double wall, 110% secondary containment	Diesel fuel	500
A – portable cube fuel cell, double wall, 110% secondary containment	Diesel fuel	500
A – integral tanks for wastewater treatment plant generator	Diesel fuel	245
A – integral tanks for portable light plants #1	Diesel fuel	43

Total Aboveground Storage Capacity ^c	<u>1,288</u>	gallons
Total Completely Buried Storage Capacity	<u>n/a</u>	gallons
Facility Total Oil Storage Capacity	<u>1,288</u>	gallons

^a Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

^b Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

^c Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment ^a is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	<input checked="" type="checkbox"/>

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge					
Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method ^a	Secondary containment capacity (gallons)
<i>Bulk Storage Containers and Mobile/Portable Containers^b</i>					
Portable cube fuel cell #1	Tank overfill, fitting leak, seam Failure, container puncture	500	East to impervious OU-1 North area	double wall/shell	550
Portable cube fuel cell #2	Tank overfill, fitting leak, seam Failure, container puncture	500	East to impervious OU-1 North area	double wall/shell	550
<i>Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers)^c</i>					
Portable light plant #1	Tank overfill, fitting leak, seam failure	43	East to impervious OU-1 North area	Spill kit	65
Diesel generator for wastewater treatment plant	Tank overfill, fitting leak, seam failure	245	East to impervious OU-1 North area	double wall/shell	
<i>Piping, Valves, etc.</i>					
None					
<i>Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)</i>					
Supply line (negative pressure) from portable fuel cube to fuel pump of portable light plant	Fitting leak, line failure	<1	East to impervious OU-1 North area	Spill kit	65
<i>Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)</i>					
None					

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

^b For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

^c For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. [§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]	<input checked="" type="checkbox"/>
<p>The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:</p> <p>1) An assigned knowledgeable project employee performs periodic visual inspections of the project's aboveground oil storage containers, including all product transfer areas, using Attachment 3.1 to document inspections; records of inspections consist of the project's daily inspection checklist and the rental vendor's annual inspection requirements. Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays).</p> <p>2) The liquid level gauges on the diesel ASTs are also verified visually during periodic visual inspections of the project's aboveground oil storage containers; Attachment 3.1 documents these inspections.</p> <p>3) An assigned knowledgeable project employee also visually inspects the negative pressure supply lines and transfer pump(s) at the Fuel Transfer Areas for indications of deterioration and discharges, including the transfer hoses and fittings, during periodic visual inspections of the project's aboveground oil storage containers; Attachment 3.1 documents these inspections.</p> <p>4) An assigned employee inspects spill kits monthly to check equipment serviceability and ensure fully stocked kits.</p> <p>5) If employee encounters a spill during an inspection of the oil storage or transfer equipment, the employee will immediately take the necessary actions outlined in Table G-7.</p>	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. [§112.7(e)]	<input checked="" type="checkbox"/>
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. [§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]	<input checked="" type="checkbox"/>
Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	<input checked="" type="checkbox"/>
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. [§112.7(f)]	<input checked="" type="checkbox"/>
A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)] Name/Title: <u>Rick Woodworth, Project Manager</u>	<input checked="" type="checkbox"/>
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. [§112.7(f)] [See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]	<input checked="" type="checkbox"/>

4. Security (excluding oil production facilities) §112.7(g):**Table G-6 Implementation and Description of Security Measures**

Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.	<input checked="" type="checkbox"/>
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The following is a description of how you 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; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

- 1) Portable cube fuel cells #1 and #2 have hinged hatch lids with a lock hasp securing the fill spout and all other attached valves, piping, and appurtenances. These hatch lids shall remain locked unless directly attended by an assigned knowledgeable project employee.
- 2) Portable light plant #1 has a hinged engine compartment cover with a lock hasp securing the fill spout and all other attached valves, piping, and appurtenances. The engine compartment cover shall remain locked unless directly attended by an assigned knowledgeable project employee. The controls and power supply connections for the pumps drawing fuel from the cube fuel cell are positioned within the engine compartments of the light plant and therefore protected and secured by the hinged engine compartment cover.
- 2) The diesel generator for the wastewater treatment plant has hinged engine compartment covers with a lock hasp securing the fill spout and all other attached valves, piping, and appurtenances. These engine compartment covers shall remain locked unless directly attended by an assigned knowledgeable project employee. The controls and power supply connections for the pumps drawing fuel from the cube fuel cell is positioned within the engine compartment of the generator set and therefore protected and secured by the hinged engine compartment covers.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):**Table G-7 Description of Emergency Procedures and Notifications**

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]:

- 1) Department of Transportation-specified salvage drums or containers and suitable quantities of proper absorbent material shall be available and used in areas where spills, leaks, or ruptures may occur.
- 2) Shutdown pumping in event of a spill during any fuel transfer operation or an emergency at the fuel pump on cube fuel cell.
- 3) Eliminate potential sources of ignition such as open flames or sparks.
- 4) If possible, safe, and trained to do so, identify and secure source of the discharge and contain the discharge with sorbents, sandbags, or other material from the spill kits. **NOTE:** *Employees who are required to respond to hazardous emergency situations shall be trained to their level of responsibility according to 29 CFR 1910.120 (q) and 29 CFR 1926.65 (q) requirements. At a minimum, Emergency Response Team personnel at Harshaw will be trained to the "First Responder Operations Levels" specified in 29 CFR 1910.120 (q)(6)(ii). Personnel having a potential need to use spill kit items shall be trained to the spill plan, briefed on SDSs of products that could potentially be spilled, and be briefed to the spill kits' locations and contents.*
 - a. Connex box in the Support Zone
 - b. Immediate work areas
- 5) Follow any additional requirements of Appendix G, Emergency Management and Contingency Procedure, of Accident Prevention Plan/Site Safety and Health Plan or the Former Harshaw Chemical Company Site Remediation of Operable Units 1 and 2 Remediation Project
- 6) Contact regulatory authorities and other response personnel and organizations (see next page; Table G-8).

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	Telephone Number
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Enviro-Fix Solutions LLC	650-347-1555
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: Rick Woodworth Project Manager	Office: 215-776-0629
	Emergency: same
Yong McGuire Site Safety and Health Officer	Office: (720) 666-8224
	Emergency: same
Marc Mizrahi Program Manager	Office: 973-202-8776
	Emergency: same
State Oil Pollution Control Agencies Ohio Environmental Protection Agency (OEPA)	1-800-282-9378
Other State, Federal, and Local Agencies Dave Bala Contracting Officer Representative (COR) US Army Corps of Engineers, Buffalo District	216-701-5208
Other State, Federal, and Local Agencies Local Emergency Planning Committee (Cuyahoga County Hazmat Coordinator John O'Donnell)	216-698-2357
Local Fire Department	911 (emergency) 216-664-6800 (business)
Local Police Department	911 (emergency) 216-621-1234 (business)
Hospital MetroHealth Hospital	216-778-7800
Other Contact References (e.g., downstream water intakes or neighboring facilities) None	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines [See Discharge Notification Form in Attachment 4]: [§112.7(a)(4)]	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • The exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimate of the total quantity discharged; • Estimate of the quantity discharged to navigable waters; • Source of the discharge; 	<ul style="list-style-type: none"> • Description of all affected media; • Cause of the discharge; • Any 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.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

- A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
- Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

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

* * * * *

**NOTE: Complete one of the following sections (A, B or C)
as appropriate for the facility type.**

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and 112.12(b)(1)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Valves of manual, open-and-closed design are used for the drainage of diked areas. [§§112.8(b)(2) and 112.12(b)(2)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. [§§112.8(c)(1) and 112.12(c)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: [§§112.8(c)(3) and 112.12(c)(3)]		
• Bypass valve is normally sealed closed	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Bypass valve is opened and resealed under responsible supervision	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
For completely buried metallic tanks installed on or after January 10, 1974 at this facility [§§112.8(c)(4) and 112.12(c)(4)]:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Regular leak testing is conducted.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]:		
• Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.8(c)(6) and §112.12(c)(6)(i)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.12(c)(6)(ii)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Table G-10 General Rule Requirements for Onshore Facilities	N/A	
<p>Each container is provided with a system or documented procedure to prevent overfills for the container. Describe:</p> <p>Tank truck fuel delivery procedures:</p> <ol style="list-style-type: none"> 1) Check the level gauge and visually confirm AST level to prevent tank overfill. 2) Set parking brake and use chock blocks to prevent movement; inspect fittings and fueling hose for damage. 3) Monitor valve-hose fitting connections and have compatible sorbent pads available in the event of a leak. 4) Monitor the liquid level in the receiving tank during transfer to prevent tank overfill. 5) If an oil spill occurs, the spill kit will be used to contain the spill. Spill kits are located adjacent to locations #1, #3, and #4. <p>Location #5 cube fuel cell pump/dispenser fueling procedures:</p> <ol style="list-style-type: none"> 1) Before filling motorized equipment, shutoff all engines and set parking brakes; do not leave filling operation unattended. 2) Do not top off tank or safety can. 3) If an oil spill occurs, the spill kit will be used to contain the spill. <p>All fueling operations shall comply with the requirements of AHA-LFRP-0011, <i>Refueling</i>, current revision.</p>	☒	☐
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]	☒	☐
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. [§§112.8(c)(10) and 112.12(c)(10)]	☒	☐
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. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]	☒	☐
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]	☐	☒

B. Onshore Oil Production Facilities (excluding drilling and workover facilities) (§112.9(b), (c), and (d)):**NOT APPLICABLE**

The owner or operator must meet the general rule requirements as well as the requirements under this section. Note that not all provisions may be applicable to all owners/operators. **In cases where a provision is not applicable, write "N/A".**

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
At tank batteries, separation and treating areas, drainage is closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is returned to storage or disposed of in accordance with legally approved methods. <i>[§112.9(b)(1)]</i>	<input type="checkbox"/>	<input type="checkbox"/>
Prior to drainage, diked areas are inspected and <i>[§112.9(b)(1)]</i> : <ul style="list-style-type: none"> Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters Bypass valve is opened and resealed under responsible supervision Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3] 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Field drainage systems and oil traps, sumps, or skimmers are inspected at regularly scheduled intervals for oil, and accumulations of oil are promptly removed [See Inspection Log and Schedule in Attachment 3.1] <i>[§112.9(b)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>
The containers used at this facility are compatible with materials stored and conditions of storage. <i>[§112.9(c)(1)]</i>	<input type="checkbox"/>	<input type="checkbox"/>
All tank battery, separation, and treating facility installations (except for flow-through process vessels) are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond. <i>[§112.9(c)(2)]</i>	<input type="checkbox"/>	<input type="checkbox"/>
Except for flow-through process vessels, containers that are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. [See Inspection Log and Schedule in Attachment 3.1] <i>[§112.9(c)(3)]</i>	<input type="checkbox"/>	<input type="checkbox"/>
New and old tank batteries at this facility are engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following: <ul style="list-style-type: none"> i. adequate container capacity to prevent overflow if regular pumping/gauging is delayed; ii. overflow equalizing lines between containers so that a full container can overflow to an adjacent container; iii. vacuum protection to prevent container collapse; or iv. high level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system. <i>[§112.9(c)(4)]</i> 	<input type="checkbox"/>	<input type="checkbox"/>
Flow-through process vessels and associated components are: <ul style="list-style-type: none"> Are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond; <i>[§112.9(c)(2)]</i> and That are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. [See Inspection Log and Schedule in Attachment 3.1] <i>[§112.9(c)(3)]</i> Or <ul style="list-style-type: none"> Visually inspected and/or tested periodically and on a regular schedule for leaks, corrosion, or other conditions that could lead to a discharge to navigable waters; and Corrective action or repairs are applied to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge; and Any accumulations of oil discharges associated with flow-through process vessels are promptly removed; and Flow-through process vessels are provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation within six months of a discharge from flow-through process vessels of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or a discharge more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. <i>[§112.9(c)(5)]</i> <i>(Leave blank until such time that this provision is applicable.)</i> 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule. The general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items are included in the inspection. [See Inspection Log and Schedule in Attachment 3.1] [§112.9(d)(1)]	<input type="checkbox"/>	<input type="checkbox"/>
An oil spill contingency plan and written commitment of resources are provided for flowlines and intra-facility gathering lines [See Oil Spill Contingency Plan and Checklist in Attachment 2 and Inspection Log and Schedule in Attachment 3.1] [§112.9(d)(3)] or Appropriate secondary containment and/or diversionary structures or equipment is provided for flowlines and intra-facility gathering lines to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from the pipe, will not escape the containment system before cleanup occurs.	<input type="checkbox"/>	<input type="checkbox"/>
A flowline/intra-facility gathering line maintenance program to prevent discharges from each flowline has been established at this facility. The maintenance program addresses each of the following:	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment; Flowlines, intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b). The frequency and type of testing allows for the implementation of a contingency plan as described under part 109 of this chapter. Corrective action and repairs to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge. Accumulations of oil discharges associated with flowlines, intra-facility gathering lines, and associated appurtenances are promptly removed. [§112.9(d)(4)] 	<input type="checkbox"/>	<input type="checkbox"/>
The following is a description of the flowline/intra-facility gathering line maintenance program implemented at this facility:	<input type="checkbox"/>	<input type="checkbox"/>

C. Onshore Oil Drilling and Workover Facilities (§112.10(b), (c) and (d)):
NOT APPLICABLE

The owner or operator must meet the general rule requirements as well as the requirements under this section.

Table G-12 General Rule Requirements for Onshore Oil Drilling and Workover Facilities	
Mobile drilling or worker equipment is positioned or located to prevent discharge as described in §112.1(b). [§112.10(b)]	<input type="checkbox"/>
Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or oily drilling fluids. [§112.10(c)]	<input type="checkbox"/>
A blowout prevention (BOP) assembly and well control system was installed before drilling below any casing string or during workover operations. [§112.10(d)]	<input type="checkbox"/>
The BOP assembly and well control system is capable of controlling any well-head pressure that may be encountered while the BOP assembly and well control system are on the well. [§112.10(d)]	<input type="checkbox"/>

I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

[illegible]

[illegible]

ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment. **NOT APPLICABLE**

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is attached to this Plan.

☐

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5)^a

(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"/>
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including: <ul style="list-style-type: none"> (1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges. (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. (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., NCP). (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"/> <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: <ul style="list-style-type: none"> (1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally. (2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated. (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"/> <input type="checkbox"/>
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including: <ul style="list-style-type: none"> (1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel. (2) Predesignation 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. (3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations. (4) Provisions for varying degrees of response effort depending on the severity of the oil discharge. (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. (6) 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"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

^a The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs**ATTACHMENT 3.1 – Inspection Log and Schedule****Table G-16 Inspection Log and Schedule**

This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately ^a
	Portable cube fuel cells #1 through #2	Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays). Annual inspections performed by vendor.			<input type="checkbox"/>
	Generator for wastewater treatment plant	Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays). Annual inspections performed by vendor.			<input type="checkbox"/>
	Portable light plant #1	Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays). Annual inspections performed by vendor.			<input type="checkbox"/>
	Liquid level gauges	Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays). Annual inspections performed by vendor.			<input type="checkbox"/>
	Dispenser	Visual inspections of oil storage containers follow a daily inspection during normal project work schedule (Monday through Thursday with the exception of holidays). Annual inspections performed by vendor.			<input type="checkbox"/>
	Spill kits	Monthly visual inspections and equipment/supply inventory			<input type="checkbox"/>

^a Indicate in the table above if records of facility inspections are maintained separately at this facility.

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule	
Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC)) <ul style="list-style-type: none"> • Portable light plant • Safety cans (5-gal capacity, temporary/occasional use) 	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment <ul style="list-style-type: none"> • Portable cube fuel cells #1 and #2 • Generator for wastewater treatment plant 	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection ^a	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection ^a	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

^a Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.3 – Dike Drainage Log**Table G-18 Dike Drainage Log**

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log		
Date	Description / Scope	Attendees

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information provided to the National Response Center in the Event of a Discharge

Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	<input type="checkbox"/> Soil
			<input type="checkbox"/> Water (specify)
			<input type="checkbox"/> Other (specify)
Actions taken			
Damage or injuries	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)	Evacuation needed?	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)
Organizations and individuals contacted	<input type="checkbox"/> National Response Center 800-424-8802 Time		
	<input type="checkbox"/> Cleanup contractor (Specify) Time		
	<input type="checkbox"/> Facility personnel (Specify) Time		
	<input type="checkbox"/> State Agency (Specify) Time		
	<input type="checkbox"/> Other (Specify) Time		