ALBANY, NY

Spill Prevention Control & Countermeasures Plan

~~July 2014~~
~~February 2015 Update~~
September 2016 Update

Global Companies LLC

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Albany, NY Terminal

(Facility Name)

Albany, NY

(Facility Location)

Bulk Storage and Distribution Terminal (SIC 5171, NAICS 424710)

(Type of Facility)

Global Companies LLC

(Operator Name)

50 Church Street, Albany, NY 12202

(Facility Address)

518-436-6565

(Facility Telephone Number)

Same

(Owner Name; If Different, Than Operator)

800 South Street, Waltham, MA 02453

(Owner Address)

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LOG OF PLAN REVIEW AND AMENDMENTS

PLAN REVIEW

In accordance with 40 CFR 112.5(a) Global management will complete a full review and evaluation of this SPCC Plan whenever there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge or every five (5) years, whichever is more frequent. Examples of changes that may require amendment of the Plan include, but are not limited to: (40 CFR 112.5(a))

- commissioning or decommissioning tanks or containers;
- replacement, reconstruction, or movement of tanks or containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures;
- changes of product or service;
- revision of standard operation or maintenance procedures or testing/inspection procedures.

The review is documented on the form below (§112.5(b)).[(1)] Amendments made to address changes outlined above (technical amendments) must be certified by a Professional Engineer. Technical revisions must be prepared within six months, and implemented as soon as possible, but not later than six months following the date of the amendment.

Administrative amendments (non-technical) can be completed by the facility owner or operator and must be documented in the Table below. Administrative amendments include a change in the name or contact information for facility personnel or for spill response contractors, etc. The SPCC Change Log in Appendix G should be reviewed periodically to determine if any technical or administrative changes occurred at the facility.

Review/ Amend Date	Name[(2)] Signed/Printed & Affiliation	Amend Plan[(3)]	Description of Review Amendment	Affected Page or Section	P.E. Certification [(4)]
07-2014	Jason Hayward, Tighe & Bond	Y	5 Year Plan Update		Y (See Section 1.2)
02-2015	Gianna Aiezza, PE Envirospec Engineering, PLLC	Y	Update for 5 year Secondary Containment Engineering Evaluation	Section 2.2.2 & Section 2.3	No – changes do not meet the requirements of NY State guidance and a plan for corrective action has been submitted.
09-2016	Gianna Aiezza, PE Envirospec Engineering, PLLC	Y	Add Tanks: W-2, W-3, W-4, DG-1, DG-2, DG-3	Section 2.2.7 & Section 2.3,	

Footnotes:
(1) Documentation of the of 5-year review in the Plan's Log Sheet is necessary whether or not any amendments are necessary in order to clearly show that the review was done. Documentation can be made by signing a statement that "I have completed the review and evaluation of the SPCC Plan and will (will not) amend the plan as a result". Documentation of completion of review is a function of the Manager.
(2) Typically signed by Manager, Professional Engineer or plan reviewer.
(3) Technical (T), Administrative or non-technical (A), or none (N).
(4) Only technical amendments are certified by a Professional Engineer. Technical Amendments affecting various pages within the plan can be P.E. certified here, certifying those amendments only, and will be documented in this log.

DOCUMENTATION OF PLAN REVIEW AND EVALUATION

I have completed a review and evaluation of the SPCC Plan for the Global Albany NY Terminal and
☒ **will** ☐ **will not** amend the Plan as a result. If the Plan is amended it will result in a
☒ **Technical** ☐ **Administrative/Non Technical** change.

Description of Review Amendment: **Certification of this Spill Prevention Control and Countermeasure plan is for only the portion of the amendment which complies with the SPCC regulations and NYS guidance. The facility does not meet the requirements of NY State guidance for the 5 year Secondary Containment Engineering Evaluation. A plan for corrective action has been submitted.**

Gianna M. Aiezza, PE
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

(Seal)
Date: 2/23/15

Registration No. 081422 State: New York

I have completed a review and evaluation of the SPCC Plan for the Global Albany NY Terminal and
☒ **will** ☐ **will not** amend the Plan as a result. If the Plan is amended it will result in a
☒ **Technical** ☐ **Administrative/Non Technical** change.

Description of Review Amendment: Generator tanks DG-1, 2 & 3 were added. Tanks W-2, 3 & 4 were updated. Sections 2.2.7 & 2.3 were modified.

Gianna M Aiezza, PE
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

(Seal)
Date: 8/11/16

Registration No. 081422 State: NY

1.0 General Information

Operator responsible for Facility: Global Companies, LLC

Facility Name and Location: Albany, NY Terminal (generally referred to through this plan as "facility" or "terminal")

For facility and location description: See ERAP Section 1, pg.1

Date of Initial Operation: 1924

The facility petroleum products storage capacity potential pathways for liquid to move from the facility to a water body requires by regulation a Spill Prevention Control and Countermeasure Plan (SPCC Plan). The original SPCC Plan was prepared and maintained in accordance with 40 CFR 112.7 (prior to July 2002 rulemaking).

This plan will assist the facility with the prevention and control of oil spills. This plan discusses the equipment and operating practices needed to meet the requirements of the Federal Oil Pollution Prevention Regulation found in Title 40 Code of Federal Regulations (CFR) Part 112, which includes the Spill Prevention Control and Countermeasure (SPCC) Plan requirements.

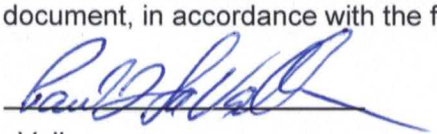
Where appropriate, this SPCC plan will refer to and include, by reference, sections of the facility's Facility Response Plan (FRP) and Emergency Response Action Plan (ERAP). The references will specify the section of the FRP or ERAP that is being included by reference. The complete FRP and ERAP are available for on-site review at the Terminal Manager’s office.

A controlled copy of this Plan is maintained in the Terminal Manager's office (Signed original). Upon proper identification, an Environmental Protection Agency (EPA) inspector shall be permitted to examine this SPCC Plan and inspect the facilities.

1.1 Management Approval

Management Approval
(Each subsequent change should be made in the next entry box)

I hereby approve the contents of the facility's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) and have the authority to commit the necessary resources to implement the SPCC Plan, as set forth in this document, in accordance with the federal requirements of 40 CFR Part 112.

Signature: 

Name: Paul LaValle

Title: VP Terminal Operations

Date: September 29, 2016

Designated person accountable for oil spill prevention at the Facility:

Name: Chuck Furman

Title: Terminal Manager

I hereby approve the contents of the facility's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) and have the authority to commit the necessary resources to implement the SPCC Plan, as set forth in this document, in accordance with the federal requirements of 40 CFR Part 112.

Signature: _____

Name: _____

Title: _____

Date: _____

Designated person accountable for oil spill prevention at the Facility:

Name: _____

Title: _____

I hereby approve the contents of the facility's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) and have the authority to commit the necessary resources to implement the SPCC Plan, as set forth in this document, in accordance with the federal requirements of 40 CFR Part 112.

Signature: _____

Name: _____

Title: _____

Date: _____

Designated person accountable for oil spill prevention at the Facility:

Name: _____

Title: _____

1.2 Professional Engineer Certification

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

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan. This SPCC Plan has been prepared for the exclusive use of Global Companies, LLC and should be used only for the purpose for which it was intended. Should the user of this report change, the certification is no longer valid and the new user must comply with requirements outlined under 40 CFR 112. If conditions at the facility have changed as they were on the date of the field visit, then this Plan may no longer be applicable and the certification may not be valid unless the plan is updated in accordance with the regulations. The findings presented are relative to the dates of our site work and information provided by the facility and should not be relied on to represent conditions at substantially later dates or under different management or ownership. Other plans referred to in this SPCC Plan were provided by the facility. The references may no longer apply if changes are made to those plans after the date of this certification.

Professional Engineer Certification

By means of this Professional Engineer Certification, I hereby attest to the best of my knowledge and belief, to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part.
- I or my agent have visited and examined the Facility(s).
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards.
- I have verified that the required inspection and testing procedures have been established as described in Section 2.8.
- I have verified that the Plan is adequate for the Facility.

(Seal)

Date: 8/27/14

Gianna M. Aiezza, PE

Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Registration No. 081422 State: New York

1.3 Substantial Harm Certification (excerpt from 40 CFR Part 112 - Attachment C-II)

The Substantial Harm Certification for the Facility is provided as follows:

The Albany, NY Terminal does not qualify for an exemption from the requirement to prepare and maintain a Facility Response Plan (FRP) because the facility has:
☒ transfers of oil over water to/from vessels
☒ a total oil storage capacity of more than one million gallons.
The Substantial Harm Certification is maintained in the ERAP, Response Plan Cover Sheet.

1.4 Contact List and Phone Numbers

The contact list and phone number reference for the Facility is provided as follows:

The Emergency Notification Procedures and Phone List is provided in the ERAP, Section 2.

1.5 Notification Data Sheets

Spill Response Notification Form:

The Spill Response Notification Form is provided in the ERAP Section 3. The form is to be used for any spill to navigable water or adjoining shoreline.

Qualifying Discharge(s) Report Form:

The Qualifying Discharge(s) Report Form is provided in SPCC Appendix C. This form is to be submitted to the EPA Region II Administrator (along with a cover letter) within sixty (60) days of a qualifying spill event to navigable water (i.e., >1000 gallons in a single event or >42 gallons in each of two (2) events within a rolling twelve (12) month period).

.

1.6 Prevention, Response and Cleanup

1.6.1 Prevention

The Facility discharge prevention measures are described as follows:

The following Global documents provide general supporting information, inspection programs, systems descriptions and emergency response procedures to demonstrate prevention measures in place at the facility.

- Emergency Response Action Plan (ERAP)
- Facility Response Plan (FRP)

See FRP Sections 5 and 7 for discharge detection and self-inspection programs.

1.6.2 Discharge discovery, response, and cleanup

The Facility discharge discovery, response and cleanup capabilities:

The facility's discharge discovery, response and cleanup capabilities are described in ERAP Sections 7 and 8 and OSRPFRP Section 3.6.

The resources available to the Facility for discharge cleanup:

The resources available to the facility for discharge cleanup are provided in the ERAP Sections 2 and 4, FRP Section 2 and FRP Appendix E

1.6.3 Disposal

The Facility has established the following methods of disposal for recovered materials in accordance with applicable legal requirements:

The methods of disposal for recovered materials are provided in ERAP Section 7.3 and FRP Appendix C.

1.6.4 Response Plans

The Facility has organized procedures that can be used when a discharge occurs so that they are readily available in an emergency:

Response procedures are provided in ERAP Section 7, ERAP Section 8 Table 3 and FRP Section 3.6, Table 3.

1.6.5 Federal Reporting Requirements

The Facility follows the Federal reporting requirements outlined in 40 CFR 112.4(a) as follows:

If the facility discharges more than 1,000 gallons of oil in a single discharge or has two discharges of more than 42 gallons within 12 months, a report must be submitted to the EPA Regional Administrator within 60 days after the 1,000 gallon discharge or the second >42 gallon discharge. The report must contain the following information and a copy of the report must also be provided to the NYSDEC: • Name of the facility; • Your name; • Location of the facility; • Maximum storage or handling capacity of the facility and normal daily throughput; • Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements; • An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary; • The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred; • Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and

- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge..

1.7 Personnel, Training, and Discharge Prevention Briefings

1.7.1 Training

The Facility provides the following minimum training to oil-handling personnel prior to assuming new job responsibilities:

- Operation and maintenance of equipment to prevent uncontrolled oil discharges;
- Oil discharge procedure protocols;
- General facility operations; and,
- Pollution control laws, rules, and regulations and the contents of this SPCC Plan.

The training program is further described as follows:

The primary activity at the terminal is the operation and maintenance of on-site petroleum distribution equipment or systems. Oil-handling personnel at the terminal receive company training that enables each individual to competently and safely perform applicable operation and maintenance duties. Newly hired, internally, or externally transferred personnel receive the following formal training:

- Operating and maintenance procedures of their assigned job (i.e., the operation and maintenance of equipment and processes to prevent uncontrolled discharges)
- Operation of wastewater / stormwater drainage and treatment systems, if applicable (i.e., to prevent discharges to surface water)
- Basic environmental training (i.e., applicable pollution control laws, rules and regulations)
- Facility overview (i.e., general facility operations and policies), and
- Basic overview of the SPCC requirements and the contents of the facility SPCC Plan.

The training is tailored to the requirements of the employee and the facility. Training also addresses an understanding of spill prevention regulations and measures implemented at the facility.

Documentation of all training, evaluation and qualifying activities for each employee includes identification of all personnel trained, their job titles, subjects covered, and training dates. Documentation is kept in the Terminal Manager’s office and/or electronically by Global.

On-the-job training is also provided to a newly assigned employee working with an existing trained employee and will cover the following topics, at a minimum:

- Equipment familiarization
- Operator data collection and entry
- Equipment start-up and shutdown and control and adjustment of operating systems through the facility's work procedures
- Application of SOPs to actual conditions

An employee’s immediate supervisor reviews and evaluates the abilities of individual employees, including their competence in performing tasks covered during formal training sessions and / or on-the-job training. An employee is not allowed to control a process alone unless they have been qualified by their supervisor.

Contractors hired to provide services at this facility have been evaluated to ensure the contractor has applicable OSHA written programs in place and a process to train their personnel on those programs. The contractors will also receive an orientation to explain any Global or site specific requirements and processes required.

The facility also requires that all Fleet or customer tank truck drivers are properly instructed under DOT, state and local regulations. Drivers complying with the prescribed rules and regulations are required to assure that they are properly trained to be able to safely and securely perform their work. The facility utilizes a certification process, during which potential hazards, emergency response action steps, and spill reporting, etc. are reviewed with drivers before they are certified to utilize the loading rack.

Designated members of the Global spill response team are provided with additional training and participate in spill response drills as described in the FRP section 8.0.

1.7.2 Briefings

The Facility conducts prevention briefings for oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for the Facility. These briefings include discussion of potential discharges or component failures and precautionary measures. The briefing program is further described as follows:

Briefings are conducted either during the annual OPA 90 tabletop exercise or by annual refresher training. During this briefing, the following are discussed:

- Changes (i.e., equipment added or removed from service, new or modified procedures, inspections requirements, notification requirements, etc.) to the facility's SPCC Plan;
- Known discharge events;
- Near misses or incidents, highlighting and describing failures;
- Malfunctioning components;
- Developed corrective measures to prevent potential issues.

Employee feedback and recommendations for discharge prevention and operation will be encouraged. Blank SPCC Briefing Sheets are included in FRP Appendix H.

1.7.3 Training / Briefing Documentation

Documentation of these Personnel, Training, and Discharge Prevention Briefing programs is maintained for a minimum period of three (3) years.

Training Records are maintained by Global and may be stored electronically and/or in the terminal's files.

Discharge Prevention Briefing Logs are provided in terminal's training files.

1.8 Facility Layout and Diagram

1.8.1 Facility Layout

The physical layout of the Facility is described as follows:

See discussion in ERAP, Section 1 and FRP, Section 3.5 for a list of facility operations hazards.

The Albany, NY Terminal receives and distributes product by marine, rail and truck operations. This SPCC Plan does not apply to the marine pipeline from the USCG regulated unloading/loading piping at the dock to the point of the first isolation valve inside containment between the Marine and Terminal facilities [see 112.1(d)(1)(i)]. These isolation valves are noted on the Site Plan/Facility Diagram. This applicability determination is based upon the General Applicability of Part 112 (Oil Pollution Prevention Regulations) to non-transportation-related onshore facilities, the definition of "onshore facility" at §112.2, and the definitions of "transportation-related" and "non-transportation-related" onshore facilities in Appendix A to Part 112.

1.8.2 Facility Diagram

The Facility Diagrams and Maps are provided in ERAP Section 8.

1.8.3 Facility Information

Oil and Chemicals Applicability.

The chemicals that are present in the facility and are stored in bulk storage tanks are listed in SPCC Appendix B.

Fixed aboveground storage tanks.

Aboveground storage tanks are shown on the Site Plan/Facility Diagram. A list can be found in the FRP Section 3.1. The list includes the tank contents and shell capacities.

Transfer Stations and connecting lines.

Aboveground and buried piping locations are shown on the Site Plan/Facility Diagram.

Completely buried and bunkered tanks (including USTs covered under 40 CFR Part 280 or 281).

Bunkered tanks are not present in the terminal. Buried tanks (U-10, 12, 13 and 14) are exempt under 112.1(d)(6) because they are used for stormwater collection and secondary containment. Sumps, manholes and catch basins, used throughout the facility, are exempt under 112.1(d)(6) because they are part of the wastewater system. The buried tanks are shown on the Site Plan/Facility Diagram. A Log Sheet can be found in SPCC Appendix B.

Drum and portable container storage areas.

Drums and portable containers are stored in dedicated accumulation/storage areas as shown on the Site Plan/Facility Diagram. A Log Sheet can be found in SPCC Appendix B.

Additional drums are used throughout the terminal. The containers can be used for collecting localized petroleum wastes. These containers are temporary and are in-transit for further handling.

These containers are placed on concrete slabs, plastic barriers, pallets, or supported on a rack to detect leaks and these containers are sited in areas with adequate containment.

Mobile / Transportation related container storage areas.

The terminal will have temporary mobile generators, compressors and pumps with integral diesel containers that are used for emergency and/or maintenance activities. Vacuum trucks can also be used to recover localized releases in catch basins, ditches, etc. These vacuum trucks are owned and operated by outside contractors. If the vacuum truck is parked overnight at the terminal, it is parked empty or is located inside the tank farm's secondary containment. A mobile proving tank is periodically used for calibrating the meters at the loading rack. A portable tank wagon is available for miscellaneous service (e.g., additives). A Log Sheet can be found in SPCC Appendix B.

Process and operational equipment/areas.

Process area equipment (Vapor Knock Out Tank, Vapor Destruction Units, and oil recirculating Vapor Recovery Unit) are used to manage hydrocarbon vapors from the loading operations. The equipment is shown on the Site Plan/Facility Diagram. A Log Sheet can be found in SPCC Appendix B.

Electrical equipment containing oil.

Electrical equipment containing oil (transformers) are shown on the Site Plan/Facility Diagram. A Log Sheet listing the electrical equipment using oil can be found in SPCC Appendix B. Electrical equipment containing oil (transformers), that is owned/operated by the utility company, is not part of this plan.

Loading/unloading racks.

The Tank truck loading rack and west end rail loading racks are shown on the Site Plan/Facility Diagram. A Log Sheet can be found in SPCC Appendix B.

Loading and unloading areas.

Tank truck loading and unloading areas (truck fueling, product water mixture transfers, product pumpback, own-use diesel and heating oil transfers, drum transfers, and additive transfers) and the Kenwood rail offloading area are shown on the Site Plan/Facility Diagram. A Log Sheet can be found in SPCC Appendix B.

Vacuum trucks are also used to recover localized releases in catch basins, ditches, etc.
Waste oil materials are transferred to and from drums.

The above transfer operations occur in areas with adequate containment or where spill response equipment (sorbent pads, granular absorbent, sorbent booms, etc.) is readily available, if needed.

1.9 Practicability of Secondary Containment

1.9.1 Piping Outside the Containment Area

The containment and/or diversionary structures or equipment to prevent a discharge

☐ **are**
☒ **are not** practicable.

If not, the following provides a description of the impracticability.

Portions of the piping are located outside the dike containment areas and the facility drainage area. These areas include:
- from the tank dike areas to the tank truck loading rack;
- from the tank dike areas to the West tank car loading rack;
- from the Kenwood rail offloading area to Tanks 30/31 containment area
- piping / valve area adjacent to Tank 28 and at the road crossing; and
- piping to tug dock for fueling (currently out of service).

It is impractical and cost prohibitive to regrade the sloping terrain and/or install concrete curbed areas underneath the piping, which would alter the natural drainage of the site.

If not practicable, an oil spill contingency plan is addressed by the Facility Response Plan.

A written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged is provided in ☐ Appendix or in the ☒ Facility Response Plan.

The FRP and ERAP include a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged. OSRO information is provided in the FRP, Appendix E.

If containment and/or diversionary structures are impracticable for bulk storage containers, then periodic integrity testing of the container(s) and integrity and leak testing of the associated valves and piping is required.

Protection is provided by frequent walk-around inspections looking for signs of leakage (see SPCC Section 2.8.9) and scheduled inspection in accordance with SPCC Section 2.8.6. The piping is welded steel, which minimizes the potential for failures.

1.10 Deviations to Rule

☐ The Facility has no deviations to the rule.
☒ The Facility has identified various deviations from the rule and the equivalent environmental protection to support the deviations. The deviations are summarized below along with the reason for nonconformance. The equivalent environmental protection measure to support the deviation is discussed in the appropriate sections of this plan.

Cathodic Protection - SPCC Section 2.5.1
The facility deviates from requirements to cathodically protect all new and replaced piping through the dike wall and piping in sleeves. Based on good engineering practices, pipe sleeves combined with the facility self-inspection program provide equivalent environmental protection.

One Hundred (100) Year Flood Level
Tank A-5 is five (5) feet in diameter and located approximately twenty (20) feet from the edge of the Hudson River. The tank is currently below the one hundred (100) year flood elevation. In order to provide environmental equivalence, the vent has been extended above the level of the tank to prevent water intrusion into the tank during flooding, The tank has also been bolted to the concrete pad beneath the tank to prevent the tank from floating in the event of a flood.

1.11 Conformance with other Requirements

Describe conformance with other applicable requirements and effective discharge prevention and containment procedures in-place at the Facility. Include a description of compliance with more stringent State rules, regulations, and guidelines, if any:

AST systems for the storage of flammable and combustible liquids are regulated under the New York MOSF and CBS requirements.

The SPCC Plan addresses these state design, construction, installation and operational requirements. Additional details regarding MOSF and CBS requirements are included in the facility spill prevention and containment plan (SPCP) and spill prevention report (SPR), respectively..

2.1 Potential Spills Analysis

The potential spill sources at the facility are summarized in SPCC Appendix A. Releases can occur from tanks, rail cars or tank truck overflow or ruptures and pipeline ruptures or leaks. The FRP discusses different potential spill scenarios, including the small, medium and worst-case discharge planning calculations.

Overall site drainage and spill pathway to navigable water is discussed in ERAP Section 7.2. Drainage diagrams are provided in the ERAP Section 8.

2.1.1 Spill History

A detailed Spill History is included in Section 3.8 of the FRP

2.2 Bulk Storage Tanks

2.2.1 Materials and Construction of Tanks

The material and construction of bulk storage containers ☒ **are** compatible with the material stored and conditions of storage such as pressure and temperature.

The bulk storage tanks are constructed of steel in accordance with the appropriate API or industry standard at the time of construction and are compatible with the products stored at the pressure and temperature range required. New steel tanks are designed and constructed in accordance with either API Standard 650 for field erected tanks or UL-142 for shop fabricated tanks.

Tank Nos 28, 29, 30, 31, 32, 33, 39 and 130 have been upgraded with a release prevention barriers (i.e., double bottoms). Cathodic protection has been installed in these tanks to inhibit corrosion. Tell-tale pipes have also been installed for leak detection.

2.2.2 Secondary Containment

Bulk storage tank installations ☒ **are** ☐ **are not** constructed so that a means of secondary containment is provided for the entire capacity of the largest single tank and sufficient freeboard to contain precipitation. **If not**, describe the “impracticability” under Section 1.9.

Released product from the aboveground bulk storage tanks would be captured in localized secondary containment areas. See SPCC Appendix D for containment volume calculations. Secondary containment is sized to contain and recover any releases that may occur from each of the tanks, including the containment volume of at least 110 percent of the largest tank, thus allowing sufficient volume for precipitation.

110 percent containment volume was determined to be adequate for the manned site and is based on the company's engineering practice in addition to being the industry practice. [API Bulletin D-16, Suggested Procedure for Development of a Spill Prevention Control and Countermeasure Plan, Fourth Edition, May 2004, states, "The SPCC regulations do not specify a volume for 'sufficient freeboard'; however, industry practice suggests using a containment volume equivalent to 110% of

the volume of the largest tank (except for locations with more stringent State or local requirements)."]

Diked areas ☒ **are not** sufficiently impervious to contain discharged oil.

The dikes are designed to withstand the hydrostatic pressure resulting from the reasonably anticipated tank release. The existing diked area is also capable of containing product (i.e., gasoline and distillate) from escaping the containment area and reaching navigable waters for the period of time needed to cleanup and remove a leak, up to the entire volume of the largest tank utilized in the systems. The diked area is visually observed daily on an informal basis, and the OSRO is capable of supplying oil pumping and cleanup capacity to recover the product. The depth to ground water at the terminal is approximately ten (10) feet. The distance to surface water is less than two hundred (200) feet. The tank dike areas are lined with Claymax (geo-composite clay liner)(GCL) and are tested every 5 years. During the 5 year liner sampling event completed in August 2014, the permeability rates varied from greater than 1 x 10-7 cm/sec to less than 1 x 10-5 cm/sec. The average permeability rate for the samples taken in the East Tank Farm Area 1 was 1.53 x 10-6 cm/sec, which is less than the NYS guidance value of 1 x 10-7 cm/sec. The average permeability rate of 7.15 x 10-6 cm/sec for the East Tank Farm Area 2 was below the NYS guidance value of 1 x 10-7 cm/sec. For the West Tank Farm, the average permeability rate for the samples taken was 2.14 x 10-6 cm/sec which does not meet the NYS guidance value of 1 x 10-6 cm/sec. The required permeability, in accordance with New York State guidance is 1 x 10-6 to 1 x 10-7 depending on the product stored. As a result, the containment is not in compliance with NYS guidance. A corrective action plan has been submitted to NYS to bring the containment into compliance with state guidance values.

2.2.3 Visible Discharges from Tanks

Visible discharges, which result in a loss of product from tanks and containers, will be promptly corrected and any accumulations of oil in the diked area(s) will be promptly removed.

The tank and dike areas are visually observed monthly by operating personnel for evidence of visible leaks (see SPCC section 2.8.9). In addition, informal undocumented daily inspections of the facility are conducted. Any leaks observed are documented in a work order system so they can be promptly repaired, replaced or taken out of service. If additional time is required, provision is made to capture and contain the leaking material in a drip pan or other appropriate containment device and the equipment is repaired or replaced at the first available time the equipment can be removed from service.

Every attempt is made to manage leaks to prevent accumulation of oil in the diked areas. Accumulation of oil in the diked areas is cleaned up promptly by facility personnel using oil spill cleanup supplies available at the facility. Large accumulation of oil in the diked area is contracted to the OSRO for corrective action.

2.2.4 Completely and Partially Buried Tanks

The Facility ☐ **does** ☒ **does not** have completely buried metallic storage tanks that were installed on/or after January 10, 1974 or are not regulated under 40 CFR Part 280 or 281.

- **If yes**, corrosion protection is provided by ☐ protective coatings and/or ☐cathodic protection (compatible with local soil conditions) or ☐ other.

- Completely buried tanks ☐ **are** ☐ **are not** regularly leak tested. See Section 2.8.3 for information on leak testing.

The Facility ☐ **does** ☒ **does not** have partially buried or bunkered metallic tanks.

- **If yes**, corrosion protection is provided by ☐ protective coatings and/or ☐ cathodic protection (compatible with local soil conditions) or ☐ other.

2.2.5 Mobile and Portable Oil Storage Containers

Mobile oil storage containers ☒ **are** ☐ **are not** located at the Facility (Note: Mobile generators with integral diesel tanks are examples of mobile containers - on wheels.).

- **If yes**, secondary containment ☒ **is and** ☐ **is not** provided which is adequately sized to contain the largest container plus sufficient freeboard for precipitation. See SPCC Section 2.3 for information on secondary containment. Where secondary containment is not adequate, see Section 1.9 for impracticability.

The terminal will have temporary mobile generators, compressors and pumps with integral diesel containers that are used for emergency and/or maintenance activities. Vacuum trucks can also be used to recover localized releases in catch basins, ditches, etc. These vacuum trucks are owned and operated by contractors. If the vacuum truck is parked overnight at the terminal, it is parked empty or is located inside the tank farm's secondary containment. Temporary mobile containers are stored within existing containment areas.

A mobile proving tank is periodically used for calibrating the meters at the loading rack. When used, the proving tank is located in the loading rack bay. When not in use, the proving tank is emptied and removed to another terminal.

The above mobile containers will be located in areas with adequate containment or where spill response equipment (sorbent pads, granular absorbent, sorbent booms, etc.) is readily available, if needed.

Portable oil storage containers ☒ **are** ☐ **are not** located at the Facility (Note: 55-gallon drums and totes are examples of portable containers.).

- **If yes**, secondary containment ☒ **is and** ☐ **is not** provided which is adequately sized to contain the largest container plus sufficient freeboard for precipitation. See SPCC Section 2.3 for information on secondary containment. Where secondary containment is not adequate, see Section 1.9 for impracticability.

See SPCC Section 2.3 for information on secondary containment for the dedicated portable container accumulation/storage areas.

Temporary "in-use" portable containers are located within existing containment areas (i.e., tank farm or loading rack). The tank farm or loading rack drainage system used for secondary

containment is greater than 110 percent of the largest portable container, thus allowing sufficient volume for precipitation.

Also, spill response equipment (sorbent pads, granular absorbent, sorbent booms, etc.) is readily available if needed.

2.2.6 Internal Heating Coils

The Facility ☐ **does** ☒ **does not** utilize internal heating coils. **If so**, internal heating coil leakage is controlled by (check method that applies):

☐ Monitoring of steam return and exhaust lines for contamination, or passing the steam return or exhaust lines pass through a settling tank or other separation system.

☐ Steam return or exhaust lines are maintained in secondary containment and do not discharge into surface waters.

☐ Equivalent environmental protection described as follows:

2.2.7 Fail Safe Precautions

Tank installation(s) are engineered with at least one of the following devices (check all that apply):

☒ High liquid level alarm with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. Describe the method and operation:

All bulk storage tanks are equipped with level sensing devices. The monitoring system includes a two-stage high/high-high level alarm system that provides audible and visual signals in the terminal office and audible signals outdoors. Product receipts from the marine transfers are monitored by the terminal operator who is in contact with the marine operations throughout the receipt. They are in constant communications via radio. This ensures immediate human response to an emergency. High level alarm or loss of communication will initiate a manual shut down of the tank filling operation. Storage tank receipts are continuously monitored and verified periodically by reading the side gauge on the receiving tanks. Discrepancies are investigated immediately by stopping the pumping and rechecking tanks and piping systems.

Additive Tanks (Tanks A-1, A-4, A-5, A-6, A-Generic, A-Exxon, A-SA, A-Red Dye-1 and A-Red Dye 2, W-2, W-3 and W-4) are equipped with local level gauges and high level alarms at the additive transfer areas. The additive tanks are gauged prior to filling and the strapping charts are used to determine fill amount. Additive receipts from the truck transfers are monitored by a terminal operator who is in contact with the tank truck driver throughout the receipt.

See discussion under SPCC Section 2.8.4 for more information on inspection and testing of the high level alarms.

☐ High liquid level pump cutoff devices set to stop flow at a predetermined container content level. Describe the method and operation:

☐ Direct audible or code signal communication between the container gauger and the pumping station. Describe the method and operation:

☒ Fast response system for determining the liquid level of each bulk storage container (i.e. digital computer, telepulse, direct vision gauge). Note: If this alternative is used, a person must be present to monitor gauges and the bulk container. Describe the method and operation:

Own-use diesel tanks on the emergency fire pumps (Dock and LR) and heating oil tanks (GAFO and WHFO) are equipped with local sight gauges and vent whistles. Diesel Generator Tanks (Tanks DG-1, DG-2 and DG-3) are equipped with local level gauges. Diesel and heating oil receipts from the truck transfers are monitored by the tank truck driver throughout the receipt.

☒ Other. Describe the method and operation:

Waste drums are attended during filling operation and levels are visually observed during the filling.

Remediation tanks (RT-1 and RT-2) are equipped with liquid level interface shut-off systems. The pumping stops when the tank level reaches the interface probe, thereby avoiding overfill. The tank levels are also gauged manually and the interface probe is checked every two weeks.

2.3 Facility Containment Systems

Containment ID	Drainage Method[(1)]	Type of Containment, Material of Construction and Design
Tank Farm (Tanks 28 - 33)	Manually operated pump to oil water separator	Claymax dike floor and wall Approximate capacity of localized containment is 128 percent of the largest tank volume (Tank 28). Per report in Appendix D
Tank Farm (Tanks 39, 64,114, 115, and 117-121)	Manually operated pump to oil water separator	Claymax dike floor and wall. Approximate capacity of localized containment is 154 percent of the largest tank volume (Tank 121). Per report in Appendix D
Tank Farm (Tank 130)	Manually operated pump to oil water separator	Claymax dike floor and wall. Approximate capacity of localized containment is 117 percent of the largest tank volume (Tank 130). Per report in Appendix D
Tank A-1	Manually operated drain valve to site drainage	Claymax containment. Approximate capacity of localized containment is 183 percent of the tank volume. Per Appendix D
Tank A-4	Manually operated drain valve to site drainage	Integral steel containment. Additional overfill protection is provided by concrete secondary containment.
Tank A-Exxon	Manually operated drain valve to site drainage	Integral steel containment. Approximate capacity of localized containment is 139 percent of the tank volume. Per Appendix D
Tank A-SA	Manually operated drain valve to spill tank (U-13)	Integral steel containment. Approximate capacity of localized containment is 110 percent of the tank volume. Per Appendix D
Tank A-Red Dye-1	Manually operated drain valve to site drainage	Within truck loading rack containment area. Containment is >110 percent of the tank volume. Per Appendix D
Tank A-Red Dye-2	NA	Integral double wall containment. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D
Tank A-Generic	NA	Integral double wall containment. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D
Tank A-5	NA	Integral double wall containment. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D
Tank A-6	NA	Integral double wall containment. Additional overfill protection is provided by concrete secondary containment. Per Appendix D
Tank GAFO	NA	Integral double wall containment. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D
Own use diesel container in LR fire pump house (150 gal)	NA	Inside building. Concrete floor and curbing. Approximate capacity of localized containment is greater than 110 percent of the tank volume. Per Appendix D
Own use diesel container in Dock fire pump house (275 gal)	NA	Inside building. Concrete floor and steel wall. Approximate capacity of localized containment is greater than 110 percent of the tank volume. Per Appendix D
Own use heating oil container in warehouse WHFO (275 gal)	NA	Inside basement of building with concrete floor. Approximate capacity of localized containment is greater than 110 percent of the tank volume. Per Appendix D
Tank RT-1	NA	Integral double wall containment. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D

Tank RT-2	Manually operated drain valve to site drainage	Integral steel containment. Approximate capacity of localized containment is 110 percent of the tank volume. Per Appendix D
Waste Accumulation Area at WWTP	Manually operated pump to wastewater treatment plant	Concrete floor and wall. Stormwater is pumped to WWTP building via portable pump. Approximate capacity of localized containment is greater than 100 percent of the tank volume. Per Appendix D
Oil accumulation area at dock	Gravity drain to spill tank (U-10)	Bentonite clay geo-synthetic liner (GCL) floor and covered earthened dike walls. Approximate capacity of localized containment is 133 percent of the largest tank volume (Tank 28). Per Appendix D
Satellite Accumulation Area at ethanol/crude Tank Car offload area	Drum	Bentonite clay geo-synthetic liner (GCL) floor and covered earthened dike walls. Approximate capacity of localized containment is 193 percent of the largest tank volume (Tank 121). Per Appendix D
Satellite Waste Oil Drum Accumulation Area at U-12	Gravity drain to spill tank (U-12)	Bentonite clay geo-synthetic liner (GCL) dike floor and covered earthened dike walls. Approximate capacity of localized containment is 125 percent of the largest tank volume (Tank 130).
Oil Drum Storage Area in truck garage	Gravity drain to spill tank (U-13)	Inside building. Concrete floor with drains to U-13 and is pumped to Tank 130. Approximate capacity of localized containment is greater than 110 percent of the tank volume.
Temporary mobile generators and pumps with integral diesel tanks	NA	Placed in existing containment areas depending on safety considerations. Clean-up supplies are maintained on-site, if needed.
Vacuum trucks in transit	NA	Clean-up supplies are maintained on-site, if needed.
Process Equipment (Tank Car Knockout Tank and VDU)	Manually operated drain valve to site drainage	Knock out drum located in integral steel containment.. VDU is located on concrete pad with curb that drains to site drainage. Approximate capacity of steel containment for knock out tank is greater than 110 percent of the tank volume.
Three (3) electrical transformers at truck entrance gate	NA	Concrete pad with asphalt bed/curbing surrounding the pad area, which will serve as localized containment until clean-up supplies can be used.
Electrical transformer at tank car loading rack	NA	Concrete pad with asphalt bed/curbing surrounding the pad area, which will serve as localized containment until clean-up supplies can be used.
Covered 8-Bay Tank Truck Loading Rack (5 active bays - bottom loading)	Gravity drain to spill tank (U-13)	Curbed concrete area draining to spill tank (U-13, 10,000 gallons). Spill tank is pumped to Tank 130. Sufficient capacity to contain the largest tank truck compartment (4,500 gallons).
Additive Transfers Area (Unloading) adjacent to Foam House	Gravity drain to spill tank (U-13)	Curbed concrete area draining to spill tank (U-13, 10,000 gallons). Spill tank is pumped to Tank 130 (1,512,696 gallons). Sufficient capacity to contain the largest tank truck compartment (6,000 gallons).
Additive Transfer Area (unloading) at rail siding and dock	Gravity drain to portable secondary containment	Unloading of drums conducted from drum within portable containment area
Product Pumpback Transfers Area (Unloading) adjacent to Foam House	Gravity drain to spill tank (U-13)	Curbed concrete area draining to spill tank (U-13, 10,000 gallons). Spill tank is pumped to Tank 130 (1,512,696 gallons). Sufficient capacity to contain the largest tank truck compartment (4,500 gallons).
Truck fueling area (Loading) adjacent to Foam House	Gravity drain to spill tank (U-13)	Curbed concrete area draining to spill tank (U-13, 10,000 gallons). Spill tank is pumped to Tank 130 (1,512,696 gallons). Sufficient capacity to contain the largest truck fuel tank (60 gallons).
West End Tank Car Loading/unloading Rack (11-spots - top loading via tank train and individual cars)	Gravity drain to spill tank (U-14)	Concrete pad with 10-inch curbing and localized spill pans under bottom connections that drain to spill tank (U-14, 10,000 gallons). Spill tank is pumped to Tank 130 (1,512,696 gallons). Sufficient capacity to contain the largest tank car compartment (26,000 gallons).

Kenwood rail offloading area 120-position)	Containment Berm w drainage to infiltration basins	Asphalt pad with curbed containment area draining to retention basins (curbed containment capacity is greater than the volume of a rail car at each offloading siding.
Stormwater/Product Water Mixture Transfers from spill tank (U-10) , localized spills, and oil water separator into Vacuum Trucks. Transfer area is adjacent to each tank.	NA	Transfers to Tank Trucks occur on an infrequent basis. Buckets are used under the vacuum truck connection and the area is concrete. Clean-up supplies (i.e., sorbent materials) are maintained on-site, if needed.
Transfer area (Loading) for product water mixtures to U12.	Gravity drain to spill tank (U-12)	Curbed concrete area draining to spill tank (U-12, 10,000 gallons). Spill tank is pumped to Tank 130).
Ethanol pump off station (unloading)	Concrete containment	Curbed concrete area with spill containment
Own-use diesel transfers to fire pump fuel oil tanks (Dock and LR) and fuel oil tanks (warehouse and GAFO) (Unloading).	NA	Transfers from Tank Trucks occur on an infrequent basis. Spill pans are used under the truck connection and the area is asphalt. Clean-up supplies are maintained on-site, if needed.
Drum Transfers from/to Trucks to Various Storage Areas within terminal. (Loading and Unloading).	NA	Concrete area, flat terrain allowing the spill to be captured and cleaned up using sorbent materials.
Aboveground Piping and Pumps Inside Diked Areas	Manually operated drain valve to oil water separator	Claymax dike floor and wall.
Aboveground Piping Inside the Loading Rack Area	Gravity drain to spill tank (U-13 or U-14)	Concrete pad with berms and buried spill tank (10,000 gallons).
Aboveground Piping Outside the Containment Area	Gravity flow to site drainage	See Impracticability Section 1.9.
Underground piping	NA	Surrounding soil.
Diesel Generator (DG)-1, DG-2, DG-3	NA	Integral double wall containment.

(1) Overall site drainage is discussed further in ERAP Section 7.2.

2.4 Facility Drainage and Effluent Treatment

2.4.1 Facility Drainage from Diked Areas

This section describes drainage from diked areas that is directly discharged to surface waters without treatment or treatment is inadequate.

The drainage from diked areas ☒ **is** ☐ **is not** sent to a Facility Effluent Treatment System which is designed to control drainage before discharge to surface waters. **If yes**, skip this section and go to Effluent Treatment. **If treatment system is not available or designed to control drainage**, continue below.

Manually operated valves ☒ **are** ☐ **are not** ☐ **no valves** normally kept closed and ☒ **are** ☐ **are not** closed following drainage.

Manually activated pumps ☒ **are** ☐ **are not** ☐ **no pumps** normally kept off and ☒ **are** ☐ **are not** placed in off operation following drainage.

☐ Equivalent environmental protection described as follows:

Describe valve / pump operation:

Stormwater inside the Tank Farm Dikes is collected in an area sump / lift station. The impounded water is pumped to gravity oil/water separator whose flow is controlled by the manually operated pump and manually operated discharge valve at the separator. Tank dike water from Tanks A-1, A-4; A-5, A-6, A-Exxon , A Red Dye-2 and RT-2 are drained as needed, using manual drain gate valves to the site drainage. The water is visually observed for sheen prior to drainage

Describe the procedure for supervising and inspecting the drainage of rainwater from diked areas into a storm drain or an open watercourse. Include description of (a) inspection for pollutants and (b) method of valving / pumping security:

The accumulated water in the dike areas is visually inspected by facility personnel for a visible sheen prior to draining the water. If a sheen is observed, the oil is recovered using oil sorbent materials or vacuum truck. The recovered oil is disposed of properly or is recovered for reuse. When or if no sheen is observed, the pump is manually activated and the water is pumped to the oil water separator. The water is treated and discharged to the permitted outfall. Following draining the pump is closed in the off position.

2.4.2 Facility Drainage from Undiked Areas

This section describes drainage from areas of the facility that do not have localized containment specifically designed for those areas (i.e., diked areas) and are using site drainage (i.e., curbing, ditches, trenches, sewers, catchment basins, ponds, etc.) to contain the spill under 40 CFR 112.7(c). If applicable, the area(s) using site drainage for secondary containment are identified below:

The facility does use site drainage (i.e., curbing, ditches, trenches, sewers, catchment basins, ponds, etc.) to contain spills at all petroleum transfer areas including the truck loading rack, West End Rail Loading/offloading area, Kenwood rail offloading area, additive transfer areas and product/water transfer area. Portions of the piping from the Tank Farm to the Loading Rack are also captured by catch basins.

Drainage from portions of the facility where petroleum transfers do not typically occur is not contained by the facility drainage system and flows as sheet flow.

The Facility drainage system ☒ **is** ☐ **is not** designed for secondary containment (e.g., piping, loading/unloading areas). **If drainage is not designed for secondary containment**, skip this section.

See above description.

The Facility Effluent Treatment System ☒ **is** ☐ **is not** ☐ **no treatment** designed to control drainage from undiked areas before discharge to surface waters. **If yes**, skip this section and go to Effluent Treatment. **If not** designed to or no treatment is available, continue below.

The Facility drainage ☐ **is** ☐ **is not** designed to flow into ☐ **ponds,** ☐ **lagoons,** ☐ **catchment basins**. If catchment basins are used, the catchment basin ☐ **is** ☐ **is not** located in areas subject to flooding. **If it is**, describe equivalent environmental protection.

If not designed to flow into ponds, lagoons or catchment basins, the final discharge ☐ **is** ☐ **is not** equipped with oil retention ☐ **baffles** ☐ **sorbent booms,** or ☐ **other:**

If neither of the above designs is used, describe undiked area drainage design or, if not addressed, describe equivalent environmental protection:

N/A

2.4.3 Effluent Treatment System

Facilities that use a wastewater (effluent) treatment system for treating drainage from diked and undiked areas must document that the treatment system is properly designed and operated to prevent a discharge of oil to surface waters. This section describes these requirements.

The Facility ☒ **does** ☐ **does not** ☐ **N/A (no treatment)** treat diked or undiked drainage water prior to discharge off site. **If treatment is not provided**, skip this section.

If treatment is provided, the effluent ☒ **is** ☐ **is not** observed frequently enough to ensure that system upsets are detected and managed in accordance with the existing SPDES permit requirements, as described in SPCC Section 2.8.8.

Records ☒ **are** ☐ **are not** kept as part of the SPDES permit requirements.

Stormwater from the Tank Farms is treated via an oil water separator prior to being discharged to the facility Outfall. As the water is discharged, it is monitored in accordance with the requirements

of the SPDES permit. The treated effluent is discharged to the Hudson River under SPDES permit NY - 0021016. Stormwater collected from product transfer areas is treated via the facility wastewater treatment plant and discharged under the SPDES Permit.

Treated effluent is monitored and analyzed in accordance with the permit requirements.. See discussion under SPCC Section 2.8.8 for more information on monitoring and reporting requirements.

Drainage waters ☐ **are** ☒ **are not** treated in more than one (1) treatment unit in parallel. **If yes**, and treatment is continuous, two lift (i.e., transfer) pumps ☐ **are** ☐ **are not** provided with at least one permanently installed. Describe the effluent conveyance and treatment system and its redundancies. **If not**, describe equivalent environmental protection.

N/A

Bypasses around the Effluent Treatment Plant ☐ **can** ☒ **can not** be used. If used, bypass valves ☐ **are** ☐ **are not** normally sealed closed. Describe the procedure for supervising and inspecting the bypassing of effluent into a storm drain or an open watercourse. Include description of (a) inspection for pollutants and (b) drainage procedures or checklist, and (c) method of recordkeeping.

N/A

2.5 Facility Transfer Operations, Pumping and Facility Piping

Transfer operations consist of piping, valves, pumps and other mechanical devices used to transfer oil from one area to another within a facility. Pipelines used to transport oil for interstate or intrastate commerce are considered transportation-related systems and are regulated under the DOT OPS or USCG program and are not regulated under the SPCC program. Some of the more common transfer operations are the piping systems required to transfer product between tanks and railcar or truck loading and unloading racks.

Describe the Facility piping systems (aboveground and buried):

Aboveground piping is used to/from the Tank Farm, from the Tank Farm to the Loading Racks, and from the Kenwood rail offloading area to the west Tank FarmBuried piping is used through dike walls and at road crossings, and rail crossings within the Kenwood rail yard.

2.5.1 Corrosion Protection of Facility Piping

The Facility ☒ **does** ☐ **does not** have buried piping. Corrosion protection for all new and replaced buried piping is provided as follows (check all that apply):

☒ Wrapping and Coating.
☐ Cathodic Protection or satisfy the corrosion protection standards in 40 CFR Part 280 or 281.
☒ **If other**, describe equivalent environmental protection.

Existing buried piping is either placed in sleeves or is coated and wrapped. Newly installed buried piping in the Kenwood rail offloading area is sleeved and equipped with inspection ports. The facility will evaluate cathodic protection for all new buried piping installations during the engineering

phase of new projects. The facility piping inspection program combined with engineering judgment, soil conditions, and corrosion protection considerations will be used to determine the need for cathodic protection on a case / site specific basis.

When and where corrosion protection is not feasible based on good engineering practices, the facility will document the decision in the project files. Cathodic protection will not be used for piping through dike walls and piping in sleeves. For all other cases, the facility will identify what protection is appropriate for the application. Such engineering judgment and the determination of what is appropriate (sleeving) for the application is equivalent environmental protection. When and where corrosion protection is feasible, the facility will document the type of cathodic protection used in the project files. Appropriate records will be maintained in the engineering files for a minimum period of 3 years. See Deviations to Rule under SPCC Section 1.10.

2.5.2 Out of Service or Standby Service Piping and Loading/Unloading Connections

Piping terminal connections (i.e., transfer loading and unloading connections) ☒ **are** ☐ **are not** securely capped or blank-flanged and marked as to origin when the piping is not in service or in standby service for extended periods. Describe measures or **if not**, describe equivalent environmental protection.

Piping connections (i.e., loading and unloading transfer connections) not in service or in standby service for extended periods are capped or blank-flanged. Loading arms at the rack have control valves and dry-break connections to prevent drainage when disconnected. Hose connection points for unloading product/additive are capped and secured with valves in the closed position to prevent discharge when not in use.

When facility piping is not in service or in standby service for an extended time, the piping connections ☒ **are** ☐ **are not** (☐ **N/A**) securely capped or blank flanged. This applies to piping that is emptied of its liquid content either by draining or by inert gas pressure. Describe measures, or **if not** secure, describe equivalent environmental protection.

Inactive pipe is classified as being "idle", "dead", or "abandoned". Idle lines are temporarily inactive lines that are separated from active lines/equipment by slip blinds. Dead lines are inactive lines that are suitable for future use and are separated from active lines/equipment by blind flanges. Abandoned lines are inactive lines that are no longer suitable for future use. Abandoned lines are preferably dismantled, but may be left in place and separated from active lines/equipment by blind flanges and may be cut and fully or partially filled with concrete or flowable fill. For inactive piping or piping in maintenance activities, the piping is emptied of its liquid contents prior to being blank-flanged or slip-blinded to prevent discharge. Blank flanging of piping and emptying the piping contents for piping in standby service is unnecessary in the facility due to surveillance by operating personnel and the security force.

Piping, associated with tanks in idle service, have been emptied of its liquid contents prior to being blank-flanged or slip-blinded to prevent discharge.

2.5.3 Pipe Supports

Pipe supports ☒ **are** ☐ **are not** designed to minimize abrasion and corrosion and allow for expansion and contraction. **If not**, describe equivalent environmental protection.

Typically, pipe supports are made of steel for elevated lines and concrete for lines at grade. Expansion loops are incorporated into long pipe routings to allow for expansion and contraction of pipe. Steel sliders are welded to the bottoms of the pipe at their points of contact with supports to eliminate abrasion of the pipe caused by movement across the support.

2.5.4 Aboveground Piping Warnings

Vehicles ☒ **are** ☐ **are not** warned ☐ orally and/or by ☐ signs, with ☐ bumper guards, or ☒ other methods to be sure that no vehicle will endanger aboveground piping or other oil transfer operations. Describe vehicle warning systems/procedures or describe equivalent environmental protection:

Aboveground piping and pipe racks are located in low or no traffic areas. For piping adjacent to vehicular traffic, installation of protective physical barriers and/or markers are provided throughout the plant to protect aboveground piping. At vehicle crossings and access points, the pipe rack is designed at a clearance height (typically sixteen (16) to twenty (20) feet depending on location) not to interfere with truck or rail traffic. Those crossings, which are lower, are marked with warning signs.

For trucks with exceptional loads, special routings are prepared by facility personnel to prevent possible pipeline rupture. Facility personnel will also escort the vehicle to its final designation and verify both lateral and vertical clearances along the way.

2.6. Facility Tank Car & Tank Truck Loading/Unloading Rack

Tank truck loading/unloading at a rack ☒ **does** ☐ **does not** occur at the Facility.

Tank car (rail) loading/unloading at a rack ☒ **does** ☐ **does not** occur at the Facility.

If yes to either, briefly describe the racks and proceed with the following sections. If not, skip this section.

An eight (8) bay tank truck loading rack is provided for distribution of petroleum products to retail outlets.

Procedures and methods are in place to ensure that vehicular discharge is prevented in loading/unloading areas before disconnection of transfer lines. The correct loading procedure is described on signs to warn the driver to disconnect prior to departure and are readily visible from all loading and unloading positions. In addition, when the loading arm is connected to the tank truck, the air brakes on the truck are set prohibiting premature truck departure. Additionally, the loading rack is equipped with Scully overfill protection to prevent tank truck overflows. Tank truck overfill sensors interact with the loading rack and automatically shut down product transfers when an overfill is detected.

Two rail areas are located at the facility. Tank trains are loaded at two (2) spots for shipment of petroleum products to distribution terminals. A second rail facility offloads ethanol/crude. The unloading area can accommodate 40 rail cars which are unloaded individually.

2.6.1 Tank Car & Tank Truck Containment Systems for Loading/Unloading Rack

Loading/unloading area drainage ☒ **does** ☐ **does not** flow into a catchment basin, treatment facility, or a quick drainage system designed to handle discharges.

The containment system ☒ **does** ☐ **does not** hold the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the Facility. Describe containment system design, construction materials, and volume and **if not**, describe impracticability under SPCC Section 1.9.

The tank truck loading rack is comprised of a concrete surface with drains that discharge to a 10,000 gallon spill tank (U-13, 10,000 gallons). . The containment system will hold the maximum capacity of any single compartment of a tank truck loaded in the plant. The spill tank has a level operated pump which, when activated, pumps the water to Wastewater Tank 130 (1,449,271 gallons).

The containment system for the West End Rail tank car loading rack includes concrete pavement with 10-inch curbing and steel containment pans. The catchment system drains to spill tank (U-14, 10,000 gallons). The spill tank has a level operated pump which, when activated, pumps the water to Wastewater Tank 130 (1,449,271 gallons). The containment system will hold the maximum capacity of any single compartment of a tank car loaded in the plant.

The Kenwood Rail offloading area is provided with the general containment to contain the most likely spill scenario. The secondary containment consists of a curbed asphalt pad draining to retention basins. The most likely spill scenario for the Kenwood rail yard is tank car overfill.

Spill response equipment (sorbent pads, granular absorbent, sorbent booms, etc.) is also readily available throughout the site. See additional secondary containment discussions under Section 2.3.

2.6.2 Prevention of Premature Vehicular Departure

The methods, procedures, and/or equipment used to prevent premature vehicular departure include (Check all that apply):

☐ ***Interlocked warning lights,***
☒ ***Warning signs,***
☒ ***Vehicle brake interlock systems,***
☐ ***Other.***
☐ ***Physical barrier systems,***
☒ ***Wheel chocks,***
☐ ***Company personnel supervising,***

Describe these and other premature vehicular departure prevention measures (for each area).

Most tank trucks at the loading rack are designed for bottom loading which are equipped with a brake interlock system. Loading procedures are posted at all loading rack bays (top and bottom loading)

Rail tank cars are loaded in accordance with all applicable DOT regulations and facility procedures. These procedures include setting the wheel brakes, flags, and chocking the required wheels in both directions.

2.6.3 Drain and Outlet Inspection

Drains and outlets on tank trucks and tank cars ☒ **are** ☐ **are not** checked for leakage before loading/ unloading or departure and, if necessary, are tightened, adjusted or replaced. **If not**, describe equivalent environmental protection.

The tank truck driver and the rail car operator informally inspects the drains and outlet connections to insure proper closure of all hatches, bottom valves, and vapor openings both prior and after the loading operation to prevent potential discharges. If necessary, the valves are tightened, adjusted or replaced prior to continuing operations. The visual inspections are not documented.

2.7 Security

The Facility ☐ **is** ☒ **is not** fully fenced. Describe the fence or, **if not** fenced, describe equivalent environmental protection:

Areas used for handling, processing and storage of oil in the terminal are fully enclosed with chain link fencing topped with barbed wire to prevent trespassing, tampering, and vandalism. The exception is the dock area, the tank truck loading rack, and several additive tanks. These areas are accessible from the Hudson River. The site is manned and the operators are trained to look for potential intruders.

Entrance gates ☒ **are** ☐ **are not** (☐ **N/A**) locked and/or guarded when the Facility is unattended or not in production. Describe the gate security or, **if not** locked or guarded, describe equivalent environmental protection:

Access to the facility is restricted during business and non-business hours. The entrance gate is accessed via proximity cards issued to authorized Company personnel and customers, which are used at an externally mounted card reader. Gates are set up to close automatically following ingress or egress. Other gates (e.g., service, tank car access) are maintained by facility personnel and are locked when not in use.

Company employees and outside contractors entering the facility must use authorized access cards. Facility visitors must sign in and may be screened by an employee or contract security guard.

Any master valves which permit direct outward flow of a tank's contents ☒ **have** ☐ **do not have** ☐ **N/A** adequate security measures so that they remain closed when in non-operating or standby status. Describe valve security or **if not** secure, describe equivalent environmental protection:

Tank transfer and drain valves are located inside the fenced area. Tank drain and water draw valves are closed and typically chained with a lock when not in use. Product receiving and outward flow piping are equipped with manual operating valves in the closed position except when in use during receipts or transfers. The facility does not lock master flow valves when they are in standby

service. Responsible operating personnel, in addition to the perimeter fencing, make valve locking unnecessary.

Starter controls on all oil pumps in non-operating or standby status ☒ **are** ☐ **are not** ☐ **N/A** locked in the off position and located at a site accessible only to authorized personnel. Describe pump starter control security or **if not** locked, describe equivalent environmental protection:

Pump controls for bulk storage tanks are located within the fenced area and are not accessible to unauthorized personnel. In addition, the site is manned and the operators are trained to look for potential intruders. Controls for the product loading pumps exist near the pumps as well as in the office building. The exterior controls cannot be changed from automatic mode unless first authorized by operations personnel. Product will not flow out of the loading arm until a separate access control system allows the control valve to open.

Controls for the additive injection pumps are located near the pumps and can be switched among various modes of operation. As with product loading, additive will not flow out of the loading arm until a separate access control system activates the additive injectors and allows the loading arm control valve to open. The various components of the separate access control system are secured in the terminal control office or in specialized enclosures only accessible to authorized personnel. Controls for the product loading pumps and the additive pumps are maintained through a computerized loading system. These controls provide for disabling of the product loading meters when desired.

A pump that is out of service due to maintenance activities will be secured by closing and tagging all necessary influent isolation valves, isolating and tagging the energy source to the pump, and depressurizing and draining the pump.

Facility lighting ☒ **is** ☐ **is not** (☐ **N/A**) commensurate with the operation and the type and location of the Facility to assist in the discovery of discharges and to prevent discharges occurring through acts of vandalism. Describe Facility lighting or, if lighting **is not** commensurate, describe equivalent environmental protection:

Fixed lighting is provided in operating areas for safety, security, operations, and spill detection. The tank farm area is provided with flood lighting directed at tanks, piping, valves and pumps. Additional lighting is provided where needed by portable lights (e.g., flashlights, mobile light/generator units).

2.8 Inspections, Evaluations, Examinations, Tests, and Records

2.8.1 Tank and Container Integrity Testing and Inspections

Describe the Facility aboveground bulk storage tank and container integrity testing and inspection program. Include inspection frequency, records of inspections and any equivalent environmental protection:

The aboveground field erected tanks will be inspected and non-destructive integrity tested in accordance with API Standard 653, Section 6 (API 653, 3rd Edition, 2001). The facility will conduct external and internal inspections for the above storage tanks as follows:

- Routine In-service Inspection (6.3.1) - Visual inspections are performed by facility personnel at an interval not to exceed one (1) month. The routine in-service visual inspection is documented using the checklist included in SPCC Appendix F.
- External In-Service Inspection (6.3.2) - Visual external inspections are performed by an API 653 Authorized Inspector at least every five (5) years.
- Internal Inspections (6.4) - All tanks are given an internal inspection by an API 653 Authorized Inspector at the intervals defined by API 653, Section 6.4.2 or 6.4.3. State regulations require internal inspections not to exceed ten (10) years for the product storage tanks.

Any repairs or alterations are to be done in accordance with API 653 Section 9. After any repairs or alterations, examination and testing of the tank shall be conducted in accordance with API 653 Section 12. Records on the construction, inspection, and repair of each tank are maintained in accordance with API 653 Sections 6.8, 6.9, and 13. The exception is that routine in-service inspections are maintained for a minimal of ten (10) years per NY requirements.

The shop-fabricated bulk storage tanks are mounted on leak prevention barriers (e.g., concrete) or are elevated where all sides are visible (i.e., the container has no contact with the ground) to ensure any leaks are immediately detected. These tanks are visually inspected at an interval not to exceed one month. The visual-only inspection shall assess the containers' exterior surfaces checking for leaks, shell distortions, signs of corrosion, paint coating deterioration, and malfunctioning of appurtenances. Facility personnel knowledgeable of facility operations, the container and the characteristics of the product stored shall conduct this inspection. The routine in-service visual inspection is documented using the checklist included in SPCC Appendix F. State regulations require external inspections every five (5) years for the additive tanks. Routine in-service inspections records are maintained for a minimal of ten (10) years per NY requirements.

The portable bulk storage containers (drums, totes, etc.) in dedicated container storage areas, are inspected at an interval not to exceed one month. The routine in-service inspections are documented by storage areas instead of by individual containers. The visual-only inspection shall assess the containers' exterior surfaces checking for leaks, shell distortions, signs of corrosion, paint coating deterioration, and malfunctioning of appurtenances. Facility personnel knowledgeable of facility operations, the container and the characteristics of the product stored shall conduct this inspection. The routine in-service visual inspection is documented by area using the checklist included in SPCC Appendix F. Drums that are "in-use" (motor oil, hydraulic oil, etc) are not formally inspected via a checklist because these drums are under constant surveillance by facility personnel.

Additional requirements for tank testing and inspections under NY State MOSF and CBS requirements are outlined in the Spill Prevention and Containment Plan and the Spill Prevention Report, respectively.

2.8.2 Tank Brittle Fracture Inspections

In the event that a field-constructed aboveground tank undergoes a repair, alteration, reconstruction, or a change in service, the tank ☒ **will** ☐ **will not** be evaluated for the risk of discharge or failure due to brittle fracture or other catastrophe.

API Standard 653, Appendix H (2nd Edition, December 1995) is used for brittle fracture evaluation for all API 650 field-erected aboveground tanks that undergo a repair, alteration, reconstruction, or a change in service.

2.8.3 Underground Tank Leak Testing

Describe the Facility leak testing program for completely buried tanks. Include frequency, records of inspections and any equivalent environmental protection:

N/A

2.8.4 Inspection of Tank Overfill Devices

Describe the frequency and method to test liquid level sensing devices:

The tank liquid level gauges are verified during manual gauging of the respective tank and are repaired or adjusted if necessary. The high-level alarms are tested monthly. Inspection information on the alarm testing is maintained in the operator's log. Any alarm failure must be fixed prior to receipt, or if not, alternate safety procedures requiring Management approval must be employed.

2.8.5 Buried Piping Inspection, Integrity and Leak Testing

Buried piping ☒ **is** ☐ **is not** present.

Integrity and leak testing of buried piping is performed at the time of ☒ installation, ☒modification, ☒ construction, ☒relocation, or ☒ replacement.

Integrity and leak testing will be conducted at the time of installation, modification, construction, relocation, or replacement of buried piping (this does not apply to aboveground piping). The initial testing will only be conducted on the specific piece or length of piping that is newly installed, modified, relocated or replaced. For existing buried piping modifications, relocations or replacements. Integrity and leak testing records will be used for purposes of piping design and repair recordkeeping. Record retention is for a minimum of five (5) years. SPCC required records will be kept at the facility.

When a buried pipe section is exposed, it is examined and corrective action taken as necessary.

If a section of buried line is exposed either unintentionally or exposed due to a non-related construction or maintenance activity, it will be carefully examined for deterioration by facility

personnel knowledgeable of facility operations, the piping, and the characteristics of the product transferred. The external examination will include:
- During excavation, care will be taken in removing soil from around the pipe to prevent damaging the pipeline or coating. The last few inches of soil will be removed manually to avoid damage to the pipe.
- Visually inspect the external condition of the piping and or coating for leaks, obvious pipe deformations or dents, deteriorated or damaged coating or wrapping, and paint/coating concerns beyond light surface rust and minor paint chipping.

If a section of buried line is exposed specifically for inspection, maintenance or repair, it will be carefully examined for deterioration by an API authorized inspector or qualified operating or maintenance personnel. The external examination will include (adapted from API 570 Section 9 "Inspection of Buried Piping", Section 9.1.6(c) Excavation, 2nd Edition, Addendum 3, August 2003):
- During excavation, care will be taken in removing soil from around the pipe to prevent damaging the pipeline or coating. The last few inches of soil will be removed manually to avoid damage to the pipe.
- Visually inspects the external condition of the piping. If the coating or wrapping is deteriorated or damaged, it should be removed in that area to visually examine the condition of the underlying metal.
- Evaluate internal corrosion and remaining thickness of the piping using external, ultrasonic thickness (UT) measurements (optional). In or out of service thickness measurements will be done with minimum disturbance, if any, to the existing pipe protective coating or wrapping.

If deteriorated coating, corrosion damage, or a leak is found, corrective action will be taken as indicated by the magnitude of the damage. Repairs/alterations will follow API 570 Section 9.3 "Repairs to Buried Piping Systems" (2nd Edition, Addendum 3, August 2003), where applicable.

Inspection documentation is not provided unless deteriorated coatings or corrosion damage are found and corrective action is taken. The facility will maintain permanent and progressive records documenting deteriorated coatings or corrosion damage findings and corrective action. SPCC required records will be kept at the facility.

2.8.6 Aboveground Piping Examination

All aboveground valves and piping (including flange joints, valve glands and bodies, catch pans, pipe supports, locking of valves, and metal surfaces) are regularly examined.

Describe the Facility piping inspection program (and integrity and leak testing, as appropriate). Include inspection frequency, records of inspection and any equivalent environmental protection:

Inspection of aboveground piping, valves and appurtenances will be performed on all piping in oil service. Walk-around, visual observations will be conducted at a minimum of monthly by the facility operators to check for leaks, distortions, paint coating deterioration, and obvious corrosion. The inspection will also assess the general condition of items, such as flange joints, valve glands and bodies, catch pans, pipe supports, and locking of valves. If piping deterioration, corrosion damage, or leaks are found, additional examination will be taken as indicated by the magnitude of the damage. Documentation will be noted where deteriorated coatings, corrosion damage, or leaks are found and corrective action is taken. The external in-service, visual observation will be documented using the checklist included in SPCC Appendix F.

2.8.7 Dike Drainage Inspections

Describe the procedure for supervising the drainage of rainwater from secondary containment into a storm drain or an open watercourse.

Dike water inspection and draining activities from additive tanks are documented on the daily inspection form in Appendix F. Drainage from tank farm areas is documented in a log book maintained at the terminal. If a sheen is observed, the oil is recovered using oil adsorbent materials or vacuum truck. The recovered oil is disposed of properly or is recovered for reuse. The log sheets will be maintained in the terminal's files for three (3) years

2.8.8 Effluent Discharge Inspections

Describe the records required under the permits issued in accordance with the SPDES requirements that apply to recording stormwater bypass events and observation of the final discharge to detect possible system upsets that may cause a discharge of oil to surface waters.

NY SPDES permit NY 0021016 requires monthly monitoring requirements for key pollutants discharged in the terminal's effluent The monitoring results are documented in Discharge Monitoring Reports (DMRs) submitted to the state each month following the end of each reporting period.

2.8.9 General Site Inspections

Describe the routine site inspection conducted by plant personnel which addresses dike integrity, oil leaks, etc.

Employees are trained to report all occurrences of tank or piping damage, leakage, evidence of stained or discolored soils and facility effluent discharged from the water treatment system or contained areas; these areas are observed while performing normal work duties. These routine walk arounds are not documented unless there are deficiencies noted.

Facility personnel conducts monthly visual inspections of the facility to check the following: piping, equipment and tanks for leakage; soils for staining and discoloring; excessive accumulation of stormwater in the diked areas; secondary containment for integrity and leaks; and the spill tank and drainage system for oil accumulation. Site-specific inspection checklists have been developed for the terminal. These checklists document when the visual inspection was performed, who performed it, and if any problems were found. Example blank checklists are included in SPCC Appendix F.

2.8.10 Recordkeeping and Documentation

Blank Inspection Checklists and Record Retention

Example blank inspection checklists and logs are provided in SPCC Appendix F. At a minimum, the inspection areas will be covered using these checklists or equivalent site-specific checklists.

Records are kept under usual and customary business practices in the terminal's files for a minimum of three (3) years, unless required longer by the standard employed or state/local requirements.