Global Companies LLC - Albany Terminal
Spill Prevention, Control and Countermeasure Plan

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Global Companies LLC - Albany Terminal
50 Church Street
Albany, NY 12202

Spill Prevention, Control and Countermeasure Plan

Developed by:

TECHNICAL RESPONSE PLANNING

2219 Sawdust Road #601 • The Woodlands, Texas 77380 USA • Tel: 281-955-9600 • Fax: 281-955-0369 • info@trpcorp.com • www.emergency-response-planning.com

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Plan Last Revised: 11/25/2019

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LOG OF PLAN REVIEW AND AMENDMENTS

PLAN REVIEW

In accordance with 40 CFR 112.5(a) Company 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]
08-2019	Scott Heddy, PE PCA Engineering. Inc.	T	5-Year Plan Update	Entire Plan	Y (See Section 1.2)
11-2019	Scott Heddy, PE PCA Engineering, Inc.	T	Added Red Dye 3 Rail, removed Red Dye 2, Updated Transformer (1) to 501 g. Update SPCC Change log form. Update Daily Inspection Form.	Section 2.2.7, 2.3 Appx B, D, F and G.	Y- Page Preface 4

[1] Documentation of the 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

40 CFR, Part 112.3(d) Professional Engineer Certification	
This PE certification is for the technical amendment associated with incorporating additive tank Red Dye 3 Rail, removing tank Red Dye 2 into this plan.	
Printed Name of Registered Professional Engineer:	Scott Heddy, PE
Signature of Registered Professional Engineer:	Scott Heddy
Date:	11/25/2019
Registration No.:	094975
Seal:	

December 18, 2019

SECTION 1
GENERAL INFORMATION

Last Revised: August 27, 2019

SECTION 1
GENERAL INFORMATION, CONTINUED

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 FRP Section 1.

Date of Initial Operation: 1924

The facility petroleum products storage capacity potential and presence of 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 and 112.8.

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 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. 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

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: 

Designated Personnel Accountable for Oil Spill Prevention at the Facility

Name: Chuck Furman

Title: Terminal Manager

Name: Paul LaValle

Title: V.P., Terminal Facilities

Date: 8/27/2019

1.2 PROFESSIONAL ENGINEER CERTIFICATION

The undersigned Registered Professional Engineer is familiar with the requirements of 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 SPCC 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 Company and should be used only for the purpose for which it was intended. Should the user of this SPCC Plan 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 the field visit 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. Most recent versions of the Facility Response Plan (FRP) and the Emergency Response Action Plan (ERAP) referred to in this SPCC Plan were provided by the facility and generally reviewed as to how the plans relate to this SPCC Plan. The references may no longer apply if changes are made to those plans after the date of this certification.

40 CFR, Part 112.3(d) Professional Engineer Certification	
Being familiar with the provisions of 40 CFR Part 112, I attest to the following: • I am familiar with the requirements of this part • I or my agent has visited and examined the Facility • The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part • Procedures for required inspections and testing have been established • The Plan is adequate for the Facility	
Printed Name of Registered Professional Engineer:	Scott Heddy
Signature of Registered Professional Engineer:	
Date:	
Registration No.:	
Seal:	

1.3 SUBSTANTIAL HARM CERTIFICATION

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

Global Companies LLC - Albany 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 and has a total oil storage capacity greater than 42,000 gallons.
- a total oil storage capacity of more than one million gallons and is located at a distance such that a discharge from the facility could cause injury to fish and wildlife and/or sensitive environments.

The Substantial Harm Certification is maintained in the FRP Figure 1.1.

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 are provided in the ERAP.

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)

The terminal has incorporated general procedures for various oil transfer activities. They are summarized as follows:

BARGE/DOCK TRANSFERS

Prior to barge unloading, facility personnel will line up valves necessary to receive product. Valves to remain closed will be locked out, to prevent operation. A drip pan is placed to collect inadvertent spillage at the hose connection. A pre-transfer conference will take place between the terminal and vessel to discuss safety measures of the product transfer. Terminal and vessel personnel are in constant communication and can immediately stop the transfer in the event that a leak is detected or overfill is imminent. The tank being filled will be gauged hourly as well as constant surveillance of the discharge hose, line pressure indicators on the shore manifold and inspection of the water around the ship and boom for oil spillage. Following the transfer, final gauging of the tank is performed and the transfer valves are closed.

TANKER TRUCK LOADING

Tanker trucks are top loaded and bottom loaded at the facility truck loading rack. Drivers access the loading system through a card activated lock system. Following the activation sequence drivers conducting top loading are required to either depress a deadman lever on the top loading arm or hold a normally closed spring operated valve open to initiate flow and continue the flow of product. For bottom loading operations, tanker trucks are equipped with electronic preset and overfill devices to prevent overfills from occurring.

PUMPBACK SYSTEM

For pumpback operations the tanker truck remains parked at the designated location. The Tanker truck provided sufficient hose to connect the tanker to the pump-back location. Transfers are constantly monitored and spill response materials are readily available at the terminal.

RAIL UNLOADING/LOADING

Prior to rail transfers, facility personnel confirm adequate capacity for receipt of the product to be transferred into the designated tankage (unloading) or rail car string (loading). Safety measures are implemented including placement of chocks on first and last cars in the rail string (both sides of wheels), placement of signage along track warning of cars being connected and locking of gates leading into the transfer area.

Scully systems are connected to the rail string prior to initiating rail loading activities to prevent overfill events from occurring. Similarly, during rail unloading events, terminal operators are present at the receiving tanks to monitor tank levels during the transfer. Terminal and rail yard operators are in constant radio communication during transfers and can stop the transfer if a risk of overfill exists.

Rail cars are inspected prior to transfers for damage, defects and leakage. Valves are confirmed to be in proper positions (e.g. vapor recovery hose connections (loading), isolation valves are fully open (loading), etc.). In addition, inspections of containment areas is conducted to insure adequate capacity for containment of any spillage and drain valves are in the closed position.

During rail transfers facility operators conduct physical walk-around inspections of the transfer area. Valve connections are inspected and tightened as warranted, with any minor spillage immediately addressed with spill kit materials stored in the transfer area.

At the completion of transfer operations, operators verify product flow has stopped, loading hoses are empty, bottom discharge valves (unloading) and rail car top fill valves (loading) are closed and cars are empty (unloading). An inspection checklist is completed for each rail car prior to removal of chocks and approval of the car for transfer from the rail loading/unloading containment area.

See FRP Sections 5 and 6 for discharge detection and self-inspection programs. Additionally the terminal Operations Manual further details oil transfer procedures. The Operations Manual is maintained at the Terminal Office.

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 Section 7 and FRP Section 2.

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 D.

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 Section 7.3 of the ERAP.

1.6.4 Response Plans

Response procedures are provided in ERAP Section 7 and FRP Section 2.

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 to navigable water 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:

- 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 Briefing

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; and
- Developed corrective measures to prevent potential issues.

Employee feedback and recommendations for discharge prevention and operation will be encouraged. Blank SPCC Plan Briefing Logs are included in Appendix G.

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.

All training and Briefing Logs are maintained by Company and are stored electronically and/or in the terminal's files.

1.8 FACILITY LAYOUT AND DIAGRAM

1.8.1 Facility Layout

The physical layout of the Facility is described as follows:

See facility layout discussion in Section 1.1 of the FRP.

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 3.1.1. 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 (Marine dock, yard drainage, loading rack and Burlington spill tanks) 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 or rack area's controlled drainage. 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 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 East Farm and West Farm tank 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 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 D.

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.

All bulk storage tanks at the facility have containment and/or diversionary structures, and as such, no integrity and leak testing of the associated valves and piping is required.

1.10 DEVIATIONS TO 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.

SECTION 2

Last Revised: November 6, 2019

ONSHORE FACILITY INFORMATION

SECTION 2
ONSHORE FACILITY INFORMATION, CONTINUED

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 FRP Sections 2.10.5 and 3.2. Drainage diagrams are provided in ERAP Section 8 and FRP Appendix E.

2.1.1 Spill History

.A detailed spill history is included in FRP section 3.2.1.

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** 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, the "impracticability" is described in 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 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** 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 oil 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 tank dike areas are lined with Claymax (geo-composite clay liner)(GCL) and are tested every 5 years. A claymax liner replacement program was completed in 2017 and all liners meet the NYSEC guidance values of 1×10^{-6} cm/sec or 1×10^{-7} cm/sec, depending on the product stored. Refer to Appendix E for documentation.

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 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 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.

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

2.2.5 Mobile and Portable Oil Storage Containers

Mobile oil storage containers **are** located at the Facility (Note: Mobile generators with integral diesel tanks are examples of mobile containers - on wheels.

- **If yes**, secondary containment **is** 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.

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 or rack area's controlled drainage. 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** located at the Facility (Note: 55-gallon drums and totes are examples of portable containers.).

- **If yes**, secondary containment **is** 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.

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 not** utilize internal heating coils.

2.2.7 Fail Safe Precautions

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

- 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-7, A-Generic, A-Exxon, A-SA, A-Red Dye-1 and A-Red Dye 3 Rail, 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.

- 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

Container ID	Drainage Method	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.
Tank Farm (Tanks 39, 64,114, 115, and 117-121)	Manually operated pump to oil water separator	Claymax dike floor and wall.
Tank Farm (Tank 130)	Manually operated pump to oil water separator	Claymax dike floor and wall.
Tank A-1	Manually operated drain valve to site drainage	Claymax containment.
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.
Tank A-SA	Manually operated drain valve to loading rack spill tank	Integral steel containment.
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.
Tank A-Red Dye-3 Rail	Manually operated drain valve to site drainage	Integral double wall containment.
Tank A-Generic	NA	Integral double wall containment.
Tank A-5	Manually operated drain valve to site dainage	Integral double wall containment.
Tank A-6	Manually operated drain valve to site drainage	Integral double wall containment.
Tank GAFO	NA	Integral double wall containment.
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.
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.
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.
Tank RT-1	NA	Integral double wall containment.

2.3 FACILITY CONTAINMENT SYSTEMS, CONTINUED

Container ID	Drainage Method	Type of Containment, Material of Construction and Design
Tank RT-2	Manually operated drain valve to site drainage	Integral steel containment.
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.
Oil accumulation area at dock	Gravity drain to ship dock spill tank	Asphalt with drains to dock ship dock spill tank and is pumped to Tank 130.
Satellite Accumulation Area at Kenwood Yard Tank Car offload area	Containment berm with 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).
Satellite Waste Oil Drum Accumulation Area at Yard drainage tank	Gravity drain to yard drainage tank	Asphalt with drains to yard drainage tank and is pumped to Tank 130.
Oil Drum Storage Area in truck garage	Gravity drain to loading rack spill tank	Inside building. Concrete floor with drains to loading rack spill tank and is pumped to Tank 130.
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.
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 loading rack spill tank	Curbed concrete area draining to loading rack spill tank (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 loading rack spill tank	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130. 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 loading rack spill tank	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130. Sufficient capacity to contain the largest tank truck compartment (4,500 gallons).
Truck fueling area (Loading) adjacent to Foam House	Gravity drain to loading rack spill tank	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130. Sufficient capacity to contain the largest truck fuel tank (60 gallons).
Burlington Rail Rack Tank Car Loading/unloading Area (top loading via tank train and individual cars)	Gravity drain to Burlington spill tank	Concrete pad with 10-inch curbing and localized spill pans under bottom connections that drain to Burlington spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324).

2.3 FACILITY CONTAINMENT SYSTEMS, CONTINUED

Container ID	Drainage Method	Type of Containment, Material of Construction and Design
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 marine dock spill tank, 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 yard spill tank	Gravity drain to yard spill tank	Curbed concrete area draining to yard spill tank (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 loading rack or Burlington spill tank	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.
W2	NA	Integral concrete containment.
W3	NA	Integral concrete containment.
W4	NA	Integral concrete containment.
Tank A-7	Manually operated drain valve to site drainage	Integral steel containment.
Electrical transformer near West end rail loading/offloading area	NA	Directed to facility site drainage

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** 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 (Section 2.4.3).

N/A - see Section 2.4.3.

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** designed for secondary containment (e.g., piping, loading/unloading areas).

See above description.

The Facility Effluent Treatment System **is** designed to control drainage from undiked areas before discharge to surface waters. **If yes**, skip this section and go to Effluent Treatment.

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** 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** 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** 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 inside the Tank Farm Dikes is collected in area sump / lift stations. The impounded water is pumped to an oil/water separator whose flow is controlled by the manually operated pumps and a manually operated discharge valve at the separator. Tank dike water from Tanks A-1, A-4, A-5, A-6,A-7, 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.

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.

Stormwater collected from product transfer areas is collected and transported off-site for treatment.

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 not** treated in more than one (1) treatment unit in parallel. **If not**, describe equivalent environmental protection.

Environmental equivalence is provided through pumps being manually operated, which prevents untreated drainage waters from being accidentally discharged. In addition, inspections are conducted frequently to detect possible system upsets that could cause a discharge.

Bypasses around the Effluent Treatment Plant **can not** be used. If used, 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 from pier to and from the tank farm, from the tank farm to the loading racks, and from the Kenwood rail offloading area to the west tank farm. Buried 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** have buried piping. Corrosion protection for all new and replaced buried piping is provided as follows:

- Wrapping and Coating.
- **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** 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 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** 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** 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** warned by **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 facility 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** occur at the Facility.

Tank car (rail) loading/unloading at a rack **does** 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 facilities, Burlington and Kenwood Yard are located at the facility. Tank trains are loaded at Burlington rail side for shipment of petroleum products to distribution terminals. There is also a lube track at Burlington rail side which can also unload petroleum product. A second rail facility, Kenwood Yard, offloads petroleum products. The unloading area can accommodate 120 rail cars.

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

Loading/unloading area drainage **does** flow into a catchment basin, treatment facility, or a quick drainage system designed to handle discharges.

The containment system **does** 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 loading rack spill tank (10,000 gallons). The containment system will hold the maximum capacity of any single compartment of a tank truck loaded at the facility. The loading rack spill tank has a level operated pump which, when activated, pumps the water to Wastewater Tank 130 (1,563,324 gallons).

The containment system for the Burlington Rail tank car loading rack includes concrete pavement with 10-inch curbing and steel containment pans. The catchment system drains to the Burlington spill tank (10,000 gallons). The Burlington spill tank has a level operated pump which, when activated, pumps the water to Wastewater Tank 130 (1,563,324 gallons). The containment system will hold the maximum capacity of any single compartment of a rail car loaded at the facility.

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 drainage pipes to retention basins are kept in a closed position. 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:

- Warning signs
- Wheel chocks
- Vehicle brake interlock systems

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** checked for leakage before loading/ unloading or departure and, if necessary, are tightened, adjusted or replaced. Describe measures or **if not**, describe equivalent environmental protection.

The tank truck driver and the rail car operator 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 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 site is manned and the operators are trained to look for potential intruders.

Entrance gates **are** 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 authorized TWIC Cards, 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 TWIC 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** 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** 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** 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. The facility will conduct external and internal inspections for the above storage tanks as follows:

- Routine In-service Inspection - 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 - Visual external inspections are performed by an API 653 Authorized Inspector at least every five (5) years.
- Internal Inspections - All tanks are given an internal inspection by an API 653 Authorized Inspector at the intervals defined by API 653. State regulations require internal inspections not to exceed ten (10) years for the product storage tanks.

Records of inspections, testing and repairs are maintained on-site.

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. 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** be evaluated for the risk of discharge or failure due to brittle fracture or other catastrophe.

API Standard 653 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** 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:

- 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, 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 Examinations

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. Inspections are signed by either the Terminal Manager or the inspector. 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.

APPENDICES

A. APPENDICES

Last Revised: November 6, 2019

APPENDICES

A - POTENTIAL SPILL ANALYSIS TABLE

PROCESS BUILDINGS										
	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
N/A	-		-			-				
STORAGE TANKS										
Container ID	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure Cause	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Surface Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
AST	Various	Largest Tank	Overfill	Up to 14,000 bph	<20,000	Within dike	Dike	Low	Contained in Dike	Not Anticipated
AST	Various	Largest Tank	Above-Grade Rupture	Leak Rate	Up to tank capacity	Within dike unless release causes breach	Dike	Low	Contained in Dike	Low
AST	Various	Largest Tank	Slow Release	Variable	<2,100	Within dike	Dike	Low	Contained in Dike	Not Anticipated
AST	Various	Largest Tank	Below grade; release from sump failure	Leak Rate	<30,000	N/A	N/A	Low	Release to Subsurface	Not Anticipated
TANK TRUCK LOADING/UNLOADING										
Equipment ID	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
Tank Truck	Various	4,500	Rupture	Variable	<4,500	Flow within drainage system	Spill Rack drainage and containment system	Low	Spill to ground, captured by drainage system	Not Anticipated

A - POTENTIAL SPILL ANALYSIS TABLE, CONTINUED

TANK TRUCK LOADING/UNLOADING										
Equipment ID	**Substance Stored (Oil)**	**Shell Capacity (gal)(1)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Tank Truck	Various	4.500	Overfill	Variable	<4,500	Flow within drainage system	Spill Rack drainage and containment system	Moderate	Spill to ground, captured by drainage system	Not Anticipated
Tank Truck	Various	4,500	Valve Failure	Variable	<4,500	Flow within drainage system	Spill Rack drainage and containment system	Low	Spill to ground, captured by drainage system	Not Anticipated
MARINE LOADING/UNLOADING										
	Substance Stored (Oil)	**Shell Capacity (gal)(1)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Marine to Tank	Various	Various	Overfill	Variable	<20,000	Within dike	Dike	Low	Contained in Dike	Not Anticipated
Marine to Tank	Various	Various	Valve Failure	Variable	<10,000	Flow within drainage system	Dock containment pan or dike	Low	Discharge to water if at dock and containment capacity is exceeded; at tank contained in dike	High (if at dock); Not anticipated if at tank area
RAIL LOADING/UNLOADING										
Equipment ID	**Substance (Oil)**	**Capacity (gal)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Rail Car	Various	32,000	Rupture	Variable	<32,000	Flow within drainage system	Spill Rack drainage and containment system	Low	Spill to ground, captured by drainage system	Not Anticipated

A - POTENTIAL SPILL ANALYSIS TABLE, CONTINUED

RAIL LOADING/UNLOADING										
Equipment ID	**Substance (Oil)**	**Capacity (gal)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Rail Car	Various	32,000	Overfill	Variable	<32,000	Flow within drainage system	Spill Rack drainage and containment system	Moderate	Spill to ground, captured by drainage system	Not Anticipated
Rail Car	Various	32,000	Valve Failure	Variable	<32,000	Flow within drainage system	Spill Rack drainage and containment system	Low	Spill to ground, captured by drainage system	Not Anticipated
DRUM STORAGE, TOTES, PORTABLE TANKS										
Transfer ID	**Substance Stored (Oil)**	**Largest Compartment (gal)(2)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Drums, totes, portable tanks	Various	Largest container	Slow Release	5 - 10	<100	Toward drain or within warehouse	Curb pad or warehouse	Moderate	Captured by drainage system or storage area containment within drum areas or warehouse	Not Anticipated
Drums, totes, portable tanks	Various	Largest container	Rupture	Variable	<1,000	Toward drain or within warehouse	Curb pad or warehouse	Low	Captured by drainage system or storage area containment within drum areas or warehouse	Not Anticipated
UNDERGROUND STORAGE TANKS										
Transfer ID	**Substance Transferred (Oil)**	**Largest Compartment (gal)(2)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
N/A										

A - POTENTIAL SPILL ANALYSIS TABLE, CONTINUED

OTHER POTENTIAL SOURCES - DAY TO DAY OPERATIONS										
Transfer ID	**Substance Transferred (Oil)**	**Largest Compartment (gal)(2)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Aboveground Piping, valve or pump maintenance	Various	Largest Fill rate	Rupture	Up to 14,000 bph	<2,100	Flow within drainage system	Tank dike or site drainage system	Low	Contained in Dike	Not Anticipated
Aboveground Piping, valve or pump maintenance	Various	Various	Valve or Flange Failure	Variable	<2,100	Flow within drainage system	Tank dike or site drainage system	Low	Contained in Dike	Not Anticipated
Underground Piping	Various	Various	Rupture	Various	<10,000	-	Surrounding Soil	Low	Release to Subsurface	Not Anticipated
Additive Transfer and Pump Back Operations	Additive	4,500	Pump/hose malfunction, overfill, rupture, valve	Various	<4,500	Flow within drainage system	Curbed concrete area draining to spill tank (10,000 gal). Spill tank is pumped to Tank 130 (1,512,696 gal)	Low	Spill to ground, captured by drainage system	Not Anticipated
Vehicle Refueling	Distillate	50 - 100	Pump/hose malfunction, overfill, rupture, valve	Variable	<100	Flow within drainage system	Curbed concrete area draining to spill tank (10,000 gal). Spill tank is pumped to Tank 130 (1,512,696 gal)	Low	Spill to ground, captured by drainage system	Not Anticipated
OIL FILLED EQUIPMENT										
	Substance Stored (Oil)	**Shell Capacity (gal)(1)**	**Potential Failure**	**Rate of Flow (gals/hr)**	**Estimated Quantity (gallons)**	**Direction of Flow**	**Containment System(s)**	**Probability of Occurrence**	**Likely Consequence**	**Likelihood of Release to (or Extending to) Surface Water?**
Generator	Diesel (Generator)	525 - 1025	Overfill	Variable	<50	Flow within drainage system	Site Drainage System	Low	Captured by drainage system	Not Anticipated

A - POTENTIAL SPILL ANALYSIS TABLE, CONTINUED

OIL FILLED EQUIPMENT										
	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
Generator	Diesel (Generator)	525 to 1025	Slow Release	<5	<50	N/A	Double Wall Tanks	Low	Double Wall System	Not Anticipated
OIL - FILLED ELECTRICAL EQUIPMENT										
	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
Electrical Transformer	Dielectric oil	Largest Transformer	Slow Release	Variable	<500	Flow within drainage system	Site Drainage System	Low	Localized Subsurface impact	Not Anticipated
SURFACE IMPOUNDMENTS										
	Substance Stored (Oil)	Shell Capacity (gal)(1)	Potential Failure	Rate of Flow (gals/hr)	Estimated Quantity (gallons)	Direction of Flow	Containment System(s)	Probability of Occurrence	Likely Consequence	Likelihood of Release to (or Extending to) Surface Water?
N/A	-		-			-				

(1) Shell capacities are noted in Table 3.1.1 of the FRP.
(2) Largest compartment sizes are noted in the Log Sheets - SPCC Plan Appendix B

B - LOG SHEETS

Potential Materials Stored at the Facility

Material Stored - Generic Name	Specific Names	Oil or Not an Oil	Comments
Gasoline	Regular Unleaded, Super Unleaded	Oil	per definition of oil under 112.2
Distillate	Diesel (LSD, USD), Kerosene, #2 Fuel Oil (Heating Oil)	Oil	per definition of oil under 112.2
Additive	Gasoline Additive, Diesel Additive, Red Dy	Oil	per definition of oil under 112.2
Ethanol	Denatured Ethanol	Oil	per definition of oil under 112.2
Crude	Crude Oil	Oil	per definition of oil under 112.2
Produce Water Mixtures	Tank Water Bottoms, Recover Oil (Slop Oil)	Oil	per definition of oil mixed with wastes under 112.2
Waste Oil	Rags, Spill Pads, Kitty Litter	Oil	per definition of oil mixed with wastes under 112.2
Dielectric Oil	Transformer Oil, Rectifier Oil	Oil	per definition of oil under 112.2

B - LOG SHEETS, CONTINUED

Potential Materials Stored at the Facility

Material Stored - Generic Name	Specific Names	Oil or Not an Oil	Comments
Lube Oil	Motor Oil, Used Motor Oil	Oil	per definition of oil under 112.2
Isopropanol		Not an Oil	USCG Card Memo
Antifreeze	Glycol	Not an Oil	USCG Card Memo

Aboveground Storage Tanks

Aboveground Bulk Storage Tanks					
Tank ID	Substance Stored (Oil)	Shell Capacity (gals)	Overfill Device	Tank Type	Heating Coils Yes/No
See FRP Section 3.1 for list	See FRP Section 3.1 for substances	See FRP Section 3.1 for capacities	See SPCC Section 2.2.7 for description	See FRP Section 3.1 for description	See SPCC Section 2.2.6 for description

Underground Storage Tanks

Underground Storage Tanks			
Tank ID	Substance Stored (Oil)	Shell Capacity (gals)	Containment System(s) Description
Tank Truck Loading Rack spill tank for rack drainage and contact water. Tank is exempt under the wastewater exemption [112.1(d)(6)]	Stormwater and product water mixtures	10,000	Fiberglass coated steel horizontal tank. PWM is pumped to Tank 130.
Burlington spill tank. Tank is exempt under the wsatewater exemption [112.1(d)(6)]	Stormwater and product water mixtures	10,000	Fiberglass coated steel horizontal tank. PWM is pumped to Tank 130.
Marine Dock spill tank. Tank is exempt under the wastewater exemption [112.1(d)(6)]	Stormwater and product water mixtures	4,000	Fiberglass horizontal tank. PWM removed by vacuum truck and transferred to Marine Dock spill tank.
One (1) yard spill tank for yard drainage. Tank is exempt under the wastewater exemption [112.1(d)(6)]	Stormwater and product water mixtures	10,000	Fiberglass coated steel horizontal tank. PWM is pumped to Tank 130.

B - LOG SHEETS, CONTINUED

Mobile Containers

Mobile Containers			
Storage Area and Type of Containers	**Substance Stored (Oil)**	**Maximum Number and Largest Shell Capacity (gals)**	**Containment System(s) Description**
Waste storage/Accumulation Area at WWTP	Oil impacted material, sandblast grit	(30) 55 gal drum	Concrete floor and wall. Stormwater is pumped to WWTP building via portable pump.
Ethanol/crude accumulation area at Kenwood yard unloading area	Waste oils	(1) 55 gal drum	Asphalt/concrete pad to site drainage
Satellite Waste Oil Drum Accumulation Area at yard spill tank	Waste Oils	(1) 55 gal drum	Concrete pad that drains to yard spill tank.
Drum/tote storage area in truck garage	Additives, Motor Oil, Kerosene, Transmission fluid, Gear Oil	(8) 55 gal drums, (10) 250 gal totes	Inside building. Conrete floor with drains to loading rack spill tank and is pumped to Tank 130.
Ethylene Glycol and isopropanol drum storage area in VRU area is not regulated since glycol is not an oil.	Antifreeze	(2) 55 gal drums	NA
Temporary mobile generators, compressors and pumps with integral diesel tanks	Distillate	Various	Placed in existing containment areas depending on safety considerations. Clean-up supplies are maintained on-site, if needed.
Vacuum trucks in transit	Product Water Mixtures	Various	Concrete area and drip buckets placed under connections. Flat terrain allowing the spill to be captured and cleaned up using sorbent materials.
Proving Tank used for calibrating meters	Gasoline/Distillate	1,200	Located in Loading Rack when in use. Stored emptied if kept on site while not in use.

B - LOG SHEETS, CONTINUED

Operational Equipment (Electrical, Manufacturing, Operating)

Operational Equipment (Electrical, Manufacturing, Operating)			
Location and Type of Equipment	**Substance (Oil)**	**Capacity (gals)**	**Containment System(s) Description**
Pole mounted electrical transformers at exit gate are owned and operated by utility company and thus, are not a part of this plan.	Dielectric oil	Unknown	NA
Three (3) electrical transformers at truck entrance gate.	Dielectric oil	Two (2) 350 - 500 ea. One (1) 501 gal.	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	Dielectric oil	>55	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 near West end rail loading/offloading area	Dielectric oil	475	Directed to facility site drainage

Process Equipment

Process Equipment			
Location and Type of Equipment	**Substance (Oil)**	**Capacity (gals)**	**Containment System(s) Description**
Knock Out Tank (TANK RRKO) on vapor recovery line and Vapor Destruction Unit located near Tank Car Loading Rack.	Condensed water and hydrocarbons	20,000	Knock out drum in steel containment (22,036 gals) and VDU are located on concrete pad. Manual drain valve to site drainage.

Loading and Unloading Activities

Loading and Unloading Activities				
Loading or Unloading Areas and Racks / Description	**Type of Transfer (tank truck, rail car)**	**Substance Transferred (Oil)**	**Largest Compartment Capacity (gals)**	**Containment System(s) Description (concrete curbs, catchment basins / tanks, etc.)**
Covered 8-Bay Tank Truck Loading Rack	Tank Truck	Gasoline and Distillate	4,500	Curbed concrete area draining to loading rack spill tank. Spill tank is pumped to Tank 130 (1,563,324 gallons).
Additive Transfers Area (Unloading) adjacent to Foam House	Tank Trucks	Additive	6,000	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324 gallons).
Additive Transers Area (Unloading) near dock and rail siding	Drums	Additive	250	Drums placed within secondary containment during transfer.

B - LOG SHEETS, CONTINUED

Loading and Unloading Activities

Loading and Unloading Activities				
Loading or Unloading Areas and Racks / Description	**Type of Transfer (tank truck, rail car)**	**Substance Transferred (Oil)**	**Largest Compartment Capacity (gals)**	**Containment System(s) Description (concrete curbs, catchment basins / tanks, etc.)**
Product Pumpback Transfers Area (Unloading) adjacent to Foam House	Tank Trucks	Gasoline and Distillate	4,500	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324).
Truck fueling area (Loading) adjacent to Foam House	Tank Truck	Distillate	Various - approx. 60	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324).
Ethanol Pumpoff (Unloading) near Wastewater Treatment Building	Tank Truck	Ethanol	9,000	Curbed concrete containment (approx 4,500 gal).
Tank Car Loading/unloading Rack (top loading with submerged fill via tank train and individual cars)	Tank Car	Gasoline and Distillate	30,000	Concrete pad with 10-inch curbing and localized spill pans under bottom connections which drain to Burlington spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324 gallons).
Tank car unloading area (120 car capacity - bottom unloading)	Tank Car	Ethanol and Denatured Ethanol	29,000	Asphalt pad with curbed containment area surrounding two offloading sidings. Containment for each siding is 61,300 gal which is sufficient for the largest compartment of each rail delivery.
Transfer area (Loading) for product water mixtures to loading rack spill tank.	Tank Truck	Product Water Mixture	5,000	Curbed concrete area draining to loading rack spill tank (10,000 gallons). Spill tank is pumped to Tank 130 (1,563,324).
Own-use diesel transfers to fire pump fuel oil tanks (Dock and LR) and fuel oil tanks (warehouse and GAFO) (Unloading).	Tank Truck	Distillate	5,000	Asphalt pad, spill bucket, and spill sorbents, if needed.

IFR - Internal Floating Rood, EFR - External Floating Rood, CR - Cone Roof, H - Horizontal Tank, ATG - automatic tank gauging, HLA - High Level Alarm, MTG - Manual Tank Gauging

C - QUALIFYING DISCHARGE(S) REPORT FORM

Click to view/print Qualifying Discharge Form

APPENDIX C

Qualifying Discharge(s) Report Form

In the event of a qualified discharge or discharges, this page can be utilized to provide official notification to the Regional Administrator. If the Facility has had a discharge or discharges which meet one of the following two criteria, then this report must be submitted to the Regional Administrator within 60 days. (Check as appropriate)

- ❑ This Facility has experienced a reportable spill as referenced in 40 CFR Part 112.1(b) of 1,000 gallons or more.
- ❑ This Facility has experienced two (2) reportable spills (as referenced in 40 CFR Part 112.1(b) of greater than 42 gallons each within a 12-month period.

Facility Name and Location: _____

Facility Contact Person (Name, address/phone number): _____

Facility maximum storage or handling capacity: _____

Facility normal daily throughput: _____

Describe the corrective action and countermeasures taken (include description of equipment repairs and replacements): _____

Describe the Facility (maps, flow diagrams and topographical maps attached as necessary): _____

Describe the cause of discharge (as referenced in 40 CFR Part 112.1(b)) including failure analysis of the system is: _____

Describe the preventative measures taken or contemplated to be taken to minimize the possibility of recurrence: _____

Other pertinent information. _____

A copy of this report is also to be sent to the appropriate state agency in charge of oil pollution control activities.

D - DIKE CONTAINMENT CALCULATIONS

Click to view/print Dike Containment Calculations

APPENDIX D

Dike Containment Calculations

Facility: Albany, NY Terminal

Additive and Ancillary Tankage

Tank ID	Shell Capacity, gal	Tank Dike Measurements**			Volume, gal	Containment Capacity, %	Comments
		Length, ft	Width, ft	Depth, ft			
A-1	12,000				22,000	183	Earthen dike. Manual drain valve to site drainage.
A-4	8,000	27.67	11.0	4.0	9,107	114	Integral steel containment. Manual drain valve to site drainage.
A-5	1,000	19	7	1.3	1,293	129	Double wall tank with interstitial monitoring, and containment for overfill.
A-6	500					>100	Double wall tank with interstitial monitoring and containment for overfill.
A-7	8,000				8,800 per Mfg.	110	Integral steel containment. Manual drain valve to site drainage.
A-Generic	8,000					>100*	Double wall tank with interstitial monitoring.
A-Exxon	4,000	18.0	10.1	4.1	5,575	139	Integral steel containment. Manual drain valve to site drainage.
A-SA	8,000	27.4	10.75	4.0	8,813	110	Integral steel containment. Manual drain valve to yard spill tank and pumped to Tank 130.
A-Red Dye1	300					>110	Within Truck Loading Rack Containment
A-Red Dye 3 Rail	500	16	10	0.9	1077	215	Double wall tank with interstitial monitoring.
GAFO	1,000					>100*	Double wall tank with interstitial monitoring.
D-Fire	275	18.83	18.0	1.5	3,803	1383*	Concrete floor and steel wall inside building.
R- Fire	150	17.66 8.08	8.67 4.67	0.625 0.625	892****	5946*	Concrete floor and curbing inside building.
WHFO	275					>100*	Concrete basement floor inside building.
RT - 1	2,000					>100*	Double wall tank with interstitial monitoring.
RT - 2	1,000	12.75	5.75	2.0	1,097	110	Integral steel containment. Manual drain valve to site drainage.
RT - 3	240					110	Double Wall Tank with interstitial monitoring
Remediation Tote 1	275					>110	Located in Tank 64 containment, Bentonite clay liner.
Remediation Tote 2	275					>110	Located in Tank 64 containment, Bentonite clay liner.

Waste Drum Storage	55	28.67	12.0	0.5	1,287	2339	Concrete floor and wall. Manual pump to wastewater system.
W2 (OOS)	7,000	30.0	12.0	3.2	8,617	123	Concrete floor and wall. Manual pump to wastewater system.
W3	7,000	30.0	12.0	3.2	8,617	123	Concrete floor and wall. Manual pump to wastewater system.
W4 (OOS)	7,000	30.0	12.0	3.2	8,617	123	Concrete floor and wall. Manual pump to wastewater System.
DG-1	525					>100	Double wall tank with interstitial monitoring.
DG-2	525					>100	Double wall tank with interstitial monitoring.
DG-3	1,025					>100	Double wall tank with interstitial monitoring.

* Tank containment is under rain cover (freeboard for precipitation is not required).
** Field measurements
*** Pre-fabricated HDPE containment pack or pallet.
**** Containment calculated using two sections.

Product Tankage

Tank Dike ID	Largest Shell Capacity, gal	Dike Volume, gal	Containment Capacity, %	Comments
28, 29, 30, 31^, 32, and 33	4,091,388	5,636,547	138**	Bentonite clay geo-synthetic liner (GCL) and dike. Manual pump to oil water separator.
39, 64, 65, 114, 115, 117, 118, 119, 120, and 121^	6,368,376	9,755,662*	153*	Bentonite clay geo-synthetic liner (GCL) and dike. Manual pump to oil water separator.
130^	1,563,324	1,825,935*	117*	Bentonite clay geo-synthetic liner (GCL) and dike. Manual pump to oil water separator.

^ Largest tank in tank dike
* Based on SPEC Engineering Secondary Containment Capacity Evaluation dated 8/27/2014.
**Based on SPEC Engineering Secondary Containment Capacity Evaluation - West Tank Farm dated 8/27/2014.

Cut/Fill Report

Generated: 2014-08-27 13:57:44
By user: K-DESILVA
Drawing: \\SPECSERVER\Envirospec Projects\Global\E14-988 - Global Albany Rail Containment\Drawings\\\SPECSERVER\Envirospec Projects\Global\E14-988 - Global Albany Rail Containment\Drawings\Containment Volume 6-4-14.dwg

Volume Summary

Name	Type	Cut Factor	Fill Factor	2d Area (Sq. Ft.)	Cut (Cu. Yd.)	Fill (Cu. Yd.)	Net (Cu. Yd.)
Berm 20.55	full	1.000	1.000	98722.91	186.35	2731.27	2544.92<Fill>

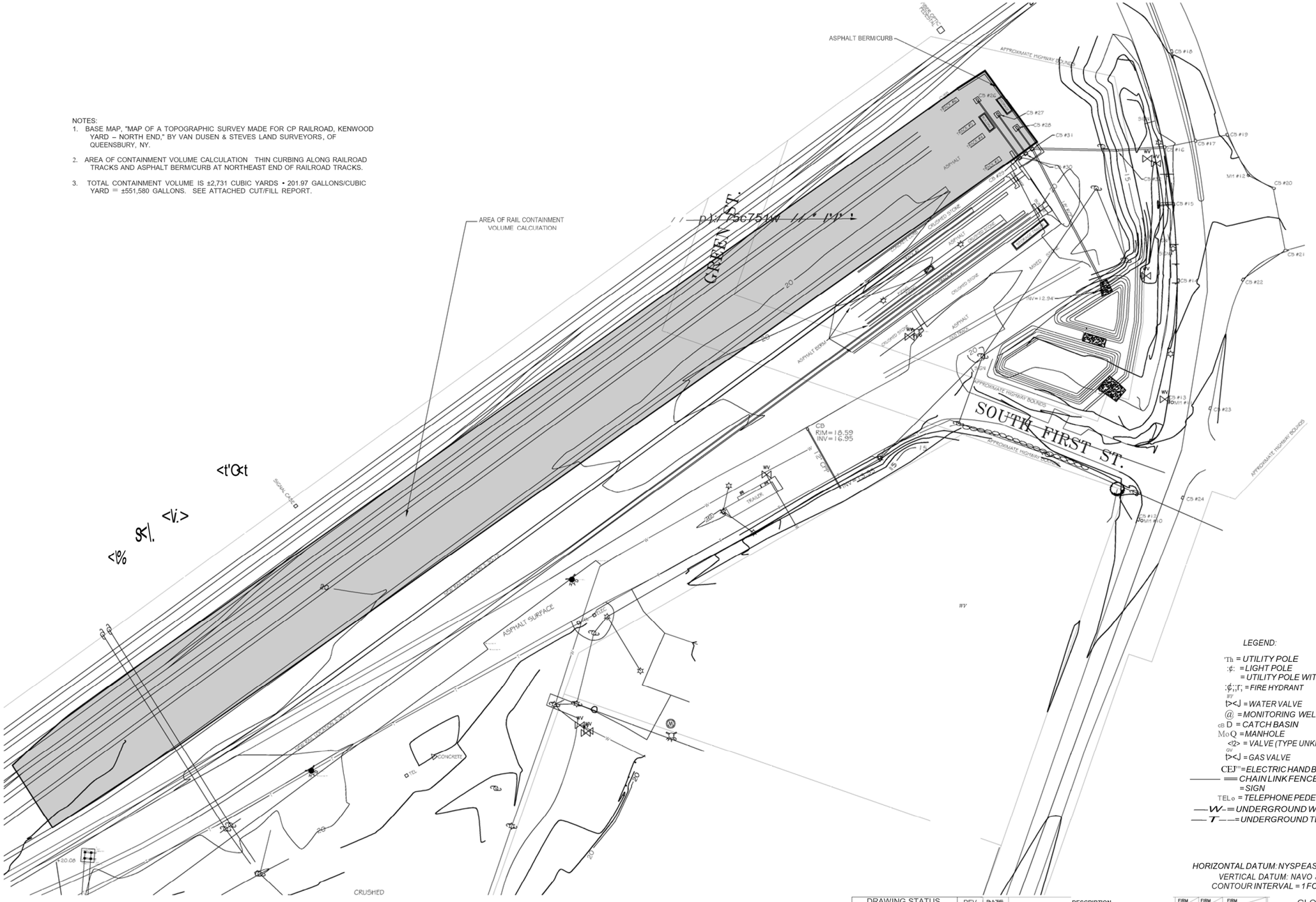
Totals

	2d Area (Sq. Ft.)	Cut (Cu. Yd.)	Fill (Cu. Yd.)	Net (Cu. Yd.)
Total	98722.91	186.35	2731.27	2544.92<Fill>

* Value adjusted by cut or fill factor other than 1.0

NOTES:

1. BASE MAP, "MAP OF A TOPOGRAPHIC SURVEY MADE FOR CP RAILROAD, KENWOOD YARD – NORTH END," BY VAN DUSEN & STEVES LAND SURVEYORS, OF QUEENSBURY, NY.
2. AREA OF CONTAINMENT VOLUME CALCULATION THIN CURBING ALONG RAILROAD TRACKS AND ASPHALT BERM/CURB AT NORTHEAST END OF RAILROAD TRACKS.
3. TOTAL CONTAINMENT VOLUME IS ±2,731 CUBIC YARDS • 201.97 GALLONS/CUBIC YARD = ±551,580 GALLONS. SEE ATTACHED CUT/FILL REPORT.



LEGEND:

- 'Th = UTILITY POLE
- :¢: = LIGHT POLE
- = UTILITY POLE WITH LIGHT
- :¢;;r; = FIRE HYDRANT
- WV
- t><J = WATER VALVE
- @ = MONITORING WELL
- cB D = CATCH BASIN
- MoQ = MANHOLE
- <I2> = VALVE (TYPE UNKNOWN)'
- GV
- t><J = GAS VALVE
- CEJ" = ELECTRIC HAND BOX
- ——— ═══ = CHAIN LINK FENCE
- = SIGN
- TELo = TELEPHONE PEDESTAL
- —W—= UNDERGROUND WATER LINE
- —T——= UNDERGROUND TELEPHONE LINE

HORIZONTAL DATUM: NYSPEASTNAD83
VERTICAL DATUM: NAVO 88
CONTOUR INTERVAL = 1 FOOT

GRAPHIC SCALE
(IN FEET)
1 inch = 50 ft

SPEC CONSULTING, LLC

DRAWING STATUS	REV.	DATE	DESCRIPTION	FIRM DRN	FIRM CKD.	FIRM APPD.

GLOBAL COMPANIES LLC

PORT OF ALBANY TERMINAL

RAIL CONTAINMENT VOLUME

SCALE: 1"=50' DATE: 8/28/14

DWG. NO. CONTAINMENT VOLUME

E - SUFFICIENTLY IMPERVIOUS DETERMINATION WORKSHEET

Click to view/print Sufficiently Impervious Determination

APPENDIX E

Sufficiently Impervious Determination
Worksheet

Note: Secondary Containment Dikes at the Terminal are equipped with Claymax Liners (geo-composite clay liner- GCL) which are certified to NYSDEC MOSF Standards every five years. 5 Year engineering evaluations are on file at the Terminal

F - BLANK INSPECTION CHECKLISTS

Click to view/print Monthly Inspection Form

Date of Inspection: _____ **Inspector's Name:** _____ **Inspector's Certification**_____

Albany Terminal MOSF # 4-1200

ITEM:	Kenwood Yard	28	29	30	31	32	33	39	64	114	115	117	118	119	120	121	130	Firepump (Rack Foam	Firepump (AST Foam House)	GAFO - (Garage Kero)	DG-1	DG-2	DG-3
1. TANK SHELL VISUALLY INSPECT TANK EXTERIOR SURFACES, SEAMS, MANHEADS AND BOTTOM ANGLE FOR EVIDENCE OF SEEPAGE, LEAKS, CRACKS, CORROSION, PITTING OR EXCESSIVE WEAR.		O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K
2. FOUNDATION CHECK SUPPORT STRUCTURE FOR EVIDENCE OF SETTLEMENT OR EROSION.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K
3. APPURTENANCES AND PIPING INSPECT PIPING WELDS, SUPPORTS, FLANGES FOR SIGNS OF LEAKAGE, CORROSION, CRACKS, THINNING AND EXCESSIVE SETTLING.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K
4. INSPECTION OF ALL VALVES INSPECT SUCTION, DISCHARGE, PRESSURE RELIEF, WATER DRAW OFF, ETC., FOR EVIDENCE OF LEAKS AT FLANGES, CONNECTIONS AND PACKING.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K
5. ALARMS TEST HIGH LEVEL ALARMS TO ENSURE PROPER FUNCTIONING. INSPECT FOR VISIBLE SIGNS OF LEAKAGE. CHECK VALVES FOR OPEN POSITIONS.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	**OK**	O/K	O/K	O/K	O/K	O/K	O/K	**X**	**X**	O/K	O/K	O/K	O/K	O/K
6. GAUGES CHECK TANK GAUGES (GROUND READING LEVEL AND THERMOMETERS) TO ENSURE PROPER FUNCTION AND ABSENCE OF LEAKAGE.		O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	N/A	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K
7. ATTACHMENTS AND ACCESSORIES VISUALLY OBSERVE STAIRWAYS, HANDRAILS, CATWALKS, FLOATING ROOF VENTS AND FOAM RISERS FOR GENERAL CONDITION AND SECURE ATTACHMENT TO TANK SHELL.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K			O/K	O/K	O/K	O/K	O/K
8. TELL-TAIL PIPES OPEN TELL-TAIL PIPES AND INSPECT FOR FREE PRODUCT, VAPORS OR ANY LEAK INDICATION.		O/K	O/K	O/K	O/K	O/K	O/K	O/K									O/K							
9. SECONDARY CONTAINMENT VISUALLY INSPECT FOR SIGNS OF EROSION, UNCONTROLLED PENETRATIONS OR BREACHES OF THE DIKE WALLS AND ANY EXPOSED LINER MATERIAL OR VEGETATION GROWING THROUGH LINER.	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K	O/K				O/K	O/K	O/K	

10. **GASOLINE EQUIPMENT LEAKS -** Note that for any gasoline liquid or vapor leak, an initial attempt to repair the leak **MUST** be made within **5 days** and the leak repaired within 15 days. Note Leaks and date of repair in the comments/corrective action sections (see log for list of equipment in gasoline service)

		YES	NO	N/A	
a)	WERE ANY GASOLINE LIQUID OR VAPOR LEAKS DETECTED DURING THE MONTHLY INSPECTION (Note in comments section)?				
b)	FOR LEAKS DETECTED DURING THIS INSPECTION AND THE PREVIOUS MONTH'S INSPECTION, WAS AN INITIAL ATTEMPT MADE TO REPAIR THE LEAK WITHIN 5 DAYS AND WAS THE LEAK REPAIRED WITHIN 15 DAYS OF DISCOVERY? (Describe in comments. If not able to repair within 15 days, contact your EHS representative.				

11. **RESPONSE EQUIPMENT -** PLEASE CHECK BOX THAT THE FOLLOWING MINIMUM VOLUMES AND INFORMATION IS CORRECT . IF NOT CORRECT, PLEASE PUT IN NOTES BELOW.

	COMMUNICATION EQUIPMENT: VARIES, TYPICALLY 6 - 12 MOTOROLA 2-WAY RADIOS - PRESENT AT TERMINAL, OPERATIONAL, ACCESSIBLE
	FIRE EXTINGUISHERS: CONFIRM FIRE EXTINGUISHER INSPECTION SHEET HAS BEEN COMPLETED.
	SORBENTS: AVAILABLE IN TERMINAL
	HAND TOOLS: AT TERMINAL USED DURING ROUTINE MAINTENANCE AND NOT DEDICATED TO EMERGENCY RESPONSE.
	SPILL PADS: AVAILABLE IN TERMINAL

ADDITIONAL NOTES:

CORRECTIVE ACTIONS:

This form satisfies the inspection requirements of 40 CFR 63 63.11089 (subpart BBBBBB). A list of all equipment in gasoline service is located in I drive I\Forms\Tanks

Revised 08.13.18

F - BLANK INSPECTION CHECKLISTS, CONTINUED

Click to view/print Daily Inspection Form

Terminal Operator's Shift (Day / Night) Checklist

Name:_____ **Date:**_____

		Check Mark	
Reviewed and signed the Shift Communications Log at Shift Change?		_____	
Truck Yard Loading Rack Area			
Any leaks or spills?		_____	Day/Night
Lights operational?		_____	Night
Spot check meter seals?		_____	Day/Night
Free of Rags/Spill Pads?		_____	Day/Night
Foam Building Eyewash		_____	Day/Night
Check Yard SPCC tank	Record Level	_____	Day/Night
Check Truck SPCC tank	Record Level	_____	Day/Night
Check Manhole that feeds Rack SPCC Tank (is 4" PVC pipe exposed?)		_____	Day/Night
Vehicle Inspections (Coast Guard)		_____	Day/Night
Rail Yard Loading Rack			
Any leaks or spills?		_____	Day/Night
Lights operational?		_____	Night
Spot check meter seals?		_____	Night
Check SPCC tank	Record Level	_____	Day/Night
Check Remediation Site - old Lube yard		_____	Day/Night
VDU Daily Checklist Completed?		_____	Night
Barge Manifold			
Any leaks/spills/seepage?		_____	Day/Night
Foam Building Eyewash Current		_____	Day/Night
Product valves locked?		_____	Day/Night
Gauge Spill Tank	Record Level	_____	Day/Night
Drip pans Clean?		_____	Day/Night
Drain dip leg on vapor line		_____	Day
Tank 130 - side gauge	_____	_____	Day/Night
Check Heat Trace? Nov-March		_____	Day/Night
Tank 65 - side gauge	_____	_____	Day/Night
Additive/H2O Treatment Chemical Tanks			
Leaks? Spills?		_____	Day/Night
Dust Cap On or Off?		_____	Day/Night
Containment clean & empty?		_____	Day/Night
Daily CBS Inspection Completed and documented?		_____	Night
Pump Area			
Clean and free of leaks?		_____	Day/Night
Any unusual noises?		_____	Day/Night
Pump off Area			
Pump back product valves locked?		_____	Day/Night
Clean and free of leaks?		_____	Day/Night

Albany Terminal
Terminal Operator's Shift A (Day/Night) Checklist

Water Treatment Building

Building Power/Heat ok?	_____ Day/Night
Check Heat Trace? Nov.-March	_____ Day/Night
Eye wash/ shower ok?	_____ Day/Night

Separator

Clean?	_____ Day/Night
Any visible products?	_____ Day/Night
Leaks?	_____ Day/Night

Check Outfall of Separator

Product Sheen?	_____ Day/Night
Odor?	_____ Day/Night

Record Meter Readings No._____ So._____ West._____

Tank Farm

Walk around tanks check?	_____ Day/Night
Checked side gauges for each tank?	_____ Night
Water draws locked?	_____ Night
Any valves leaking or seeping?	_____ Day/Night
Are receipt valves closed and locked?	_____ Day/Night
Are suction valves closed and locked when not in use?	_____ Day/Night
Is lighting working and adequate?	_____ Night
Trash/debris picked up?	_____ Day/Night
VRU Daily Checklist Completed?	_____ Day
CBS Daily Checklist Completed?	_____ Night
Backflow Buildings Check Heat? Nov-March	_____ Day

Tank Farm Inspection Form Completed _____- DAY

Additional Worked Assigned by TS

_____ _____
_____ _____
_____ _____
_____ _____
_____ _____
_____ _____

List items to be communicated with TOs, WF, and TS:

_____ _____
_____ _____
_____ _____

Prepared and signed the Shift Communications Log at Shift Change? _____

FOLIO #_____ **Daily Inventories and CBS Inspection** Time: _____

G3---> Date: _____

*** All gravity updates to live tanks need a BOL copy (after change) attached.** Inspector _____

Tank	Product	Physical BBLS in Tank From (G3)	Side Gauge Use Innage for EOM	Servo Gauges (ENTER inG3)	Temp.	Grav.	H20	Comments Gravity Updates Live to the rack?
65	WATER							
130	WATER							
114	REG 87							
115	ETHANOL							
117	REG 87							
118	SUPER 93							
119	REG 87							
120	ETHANOL							
121	REG 87							
28	ULSD #2							
29	ULSD #2							
30	ULSD #2							
31	ETHANOL							
32	CRUDE							
33	ULSD #2							
39	REG 87							
64	# 1 ULSD							

Product Tanks	Total Physical BBLS in	Circle which tank is to the rack for the day	Tank #	Comments
#2 ULSD		28/29/30/33		
# 1 ULSD		64		
CRUDE		32		
Ethanol		31/115/120		
C BOB 87		117/121/119/39/114		
C BOB 93		118		
Additive Tanks	**Gallons**			
Mobil		N/A	A-1	
Diesel Plus-DSL		N/A	A-4	
CONDUCTIVITY		N/A	A-5	
Mobil Diesel		N/A	A-7	
RED DYE BULK		N/A	A-EXXON	
GENERIC		N/A	A-GENERIC	
H O PLUS		N/A	A-RED DYE 1	
RED DYE RAIL		N/A	A-RED DYE 3	
SHELL		N/A	SA	
W-3 OLI ADDITIVE		N/A	*W-3*	

Additive tanks	Tank Labeling	Check Containment for water	Check Shells for leaks	Check pipe & fittings for leaks	Test high level alarms	Varity accuracy of aotomatic	Comments
W-2 Ferrous Sulfate					*See MOSF*	*See MOSF*	
W-3 OLI Additive					*See MOSF*	*See MOSF*	
W-4 Caustic Soda					*See MOSF*	*See MOSF*	
A-1 Mobil Additive					*See MOSF*	*See MOSF*	
A-Generic Additive A-2					*See MOSF*	*See MOSF*	
A-4 Diesel Additive					*See MOSF*	*See MOSF*	
A-5 Distillate Additive					*See MOSF*	*See MOSF*	
A-6 #2 FO Additive					*See MOSF*	*See MOSF*	***NOT IN USE***
A-7 Mobil Diesel					*See MOSF*	*See MOSF*	
A-Exxon Additive					*See MOSF*	*See MOSF*	
A-SA Shell Additive					*See MOSF*	*See MOSF*	
A-Red Dye					*See MOSF*	*See MOSF*	
A-Red Dye 3					*See MOSF*	*See MOSF*	

Please make copy of form and file inCBS Daily Checklist Binder located in the Tower.

G - SPCC CHANGE AND BRIEFING LOGS

Click to view/print Spill Prevention Log

ANNUAL SPILL PREVENTION BRIEFING

Exercise Objective:

The purpose of the annual briefing is to ensure adequate understanding and effective implementation of the facility SPCC Plan and discharge prevention measures.

Exercise Description:

These briefings should include a review of known spill events, failures or malfunctions that resulted in spills, discussion of any new equipment/operations/procedures that could affect the potential for an oil discharge, and a review of facility water discharge procedures.

Fill out Accompanying Form and Retain in Exercise File for Five (5) Years.

DISCHARGE PREVENTION BRIEFING LOG:

(If completing form electronically, left click to check a box or to enter text. Write "N/A" if a text field is Not Applicable)

Facility Name:

DISCHARGE PREVENTION BRIEFING ELEMENTS (Check that each element was completed)

- ☐ Review Spill Events that occurred over the preceding 12 months (or since last briefing)
- ☐ Discuss the cause(s) of spill and lessons learned.
- ☐ Identify any equipment failures or malfunctions that resulted in a spill or a threat of release
- ☐ Review process for inspecting and discharging stormwater.
- ☐ Review any new equipment or operations that could affect the potential for a discharge

Document any Lessons Learned, need for improvement and any changes to be implemented (with time table):

Signature:

Date:

PARTICIPANTS

Printed Name:	**Signature:**	**Printed Name:**	**Signature:**

G - SPCC CHANGE AND BRIEFING LOGS, CONTINUED

Click to view/print SPCC Change Form

Albany Terminal / Global Companies LLC

Inspection Tool

Print Format Checklist

Checklist: Change Documentation Form for SPCC Plan

1.0 Document there were NO changes to the SPCC Plan in the last 6 months:

Question	NA	Yes	No	Findings/Comments
1.1: There were NO changes to the above ground storage tanks or portable container storage areas *(e.i. designated areas for storage of frac tanks, drums, totes)*. (40 CFR 112) **Guidance:** **This question only applies to permanent tanks and permanent areas set up for storage of portable containers (i.e drum storage areas). Note that there often are portable containers brought to and from the facility which would not require the SPCC Plan be updated..**	NA	Yes	No	
1.2: There were NO changes in the type of products handled, stored, or transferred at this facility. (40 CFR 112) **Guidance:** ***This question ONLY relates to bulk products (gasoline, fuel oil, asphalt) and additives (gasoline additives, distillate additives etc). In general, changes in formulations, such as switching from a high sulfur heating oil to a low sulfur heating oil, and changes in formulation of gasoline additives, do NOT apply to this rule.***	NA	Yes	No	
1.3: There have been NO engineering projects that have increased or decreased your containment volume. (40 CFR 112)	NA	Yes	No	
1.4: There have been NO significant changes in any piping at this facility. This includes **new** and **replacement** piping above ground OR buried. (40 CFR 112)	NA	Yes	No	
1.5: There have been NO significant changes at the loading and unloading facilities at this terminals. This includes removal, additions and modifications to the loading and unloading systems. (40 CFR 112)	NA	Yes	No	
1.6: There have been NO changes to the frequency or methods used for walk-arounds, inspections, tests and gauging at this facility. (40 CFR 112) **Guidance:** **This includes all inspections and tests required as per the SPCC Plan.**	NA	Yes	No	
1.7: There have been NO changes to the inspection checklists referenced in the SPCC Plan. (40 CFR 112) **Guidance:** **Refer to *SPCC Appendix F for the most current inspection forms.***	NA	Yes	No	
1.8: The list of trained employees in both your SPCC and ERAP/FRP is current. (40 CFR 112) **Guidance:** **If applicable, ensure the list of trained employees is current in the Dock Operations Manual as well.**	NA	Yes	No	
1.9: If there is a wastewater treatment system at the terminal (e.i. an *oil water separator, carbon treatment*), the discharge has NOT been bypassed? (40 CFR 112) **Guidance:** **Please select NA if you do NOT have a wastewater treatment system at your facility.**	NA	Yes	No	
1.10: The Terminal Manager listed in the SPCC and ERAP/FRP Plan has NOT changed. (40 CFR 112) **Guidance:** **In the SPCC Plan, the Terminal Manager is referred to as the Superintendent.**	NA	Yes	No	
1.11: There has been NO significant changes to the facility diagrams in the SPCC and ERAP/FRP Plans. (40 CFR 112) **Guidance:** ***Facility diagram/drawings referenced in the SPCC Plan are located in the ERAP.***	NA	Yes	No	
1.12: There have been NO piping, loading/unloading connections or tanks taken permanently out of service, placed in long term stand-by service, or been brought back into service? (40 CFR 112)	NA	Yes	No	

Question	NA	Yes	No	Findings/Comments
1.13: There have been NO changes to the facility security system as referenced in SPCC Plan. (40 CFR 112) **Guidance:** ***This includes NO changes to fencing and gates as well as procedures and personnel. Please review the security section in the SPCC Plan to ensure compliance.***	NA	Yes	No	
1.14: There have been NO changes or occurrences at your facility that affect your ability to prevent a spill. (40 CFR 112) **Guidance:** **This includes positive changes or occurrences as well as negative ones.**	NA	Yes	No	

2.0 Verification of your review and evaluation of the SPCC Plan: Top

Question	NA	Yes	No	Findings/Comments
2.1: If you answered “NO” to any of the questions in Section 1, an email will be automatically sent to your EHS Administrator, Sandy or Craig. Please answer 'YES' here to certify that you have reviewed your SPCC Plan. **If you have made changes that were initially certified by a professional engineer on the facility diagram, you must revise the diagram and have it re-certified.** This needs to be done within 6 months of the change that took place. **EHS is willing to assist with any updates for the facility diagram or you can handle yourself.** (40 CFR 112)	NA	Yes	No	

H - MISC DOCUMENTS

Click to view/print Appendix H

Appendix H
(Appendix intentionally left blank)