PORT OF PORTLAND
NAVIGATION BASE FACILITY
6208 NORTH ENSIGN STREET
PORTLAND, OREGON 97217

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Prepared for
PORT OF PORTLAND
NAVIGATION BASE FACILITY
Revised March 4, 2022
Project No. 0232.29.05

Prepared by
Maul Foster & Alongi, Inc.
3140 NE Broadway Street, Portland, OR 97232

MAUL
FOSTER
ALONGI

EMERGENCY SPILL CONTACTS

A SPILL IS DEFINED AS AN EMERGENCY SPILL IF ANY OF THESE ARE TRUE:

- Spill has entered or has the potential to enter the storm system or surface waters
- Spill has created or can create an immediate threat to human health or the environment
- Spill has impacted or can impact operations
- Spill impacts an area of 50 ft^2 or more
- Spill exceeds the reportable quantity (42 gallons for petroleum products)
- Spill is an unknown substance
- Spill cannot be cleaned or is not cleaned by the responsible party

IN THE EVENT OF AN EMERGENCY SPILL, CONTACT BOTH PARTIES BELOW:

Prioritized Contact	Responsibility Role	Phone Number
First Contact:PDX Comm-Center	Notifies appropriate spill response personnel	Emergency: 503-460-4000
Second Contact: Don Tjostolvson, Navigation Director	Incident command and control	Office: 503-240-2202 Mobile: 503-703-4912

Additional contact phone numbers are listed below. If/when possible, parties listed below should be contacted by prioritized contacts above:

Other Contacts	Roles	Phone Number
Fire/Police/Portland HAZMAT	Emergency response	911
U.S. Ecology	Emergency spill response contractor(s)	1-800-337-7455
Telluric Enterprises, LLC		503-505-1995
National Response Center (NRC)	Post-spill notification	1-800-424-8802
U.S. Environmental Protection Agency Oregon Operations Office		503-326-3250
Oregon Emergency Response System (OERS)		1-800-452-0311
Oregon Department of Environmental Quality General Hotline		1-888-997-7888
Portland General Electric (PGE)	On-site transformer	503-464-7777

In the event of a Non-Emergency spill, contact your immediate supervisor for response. Additional details on Emergency and Non-Emergency spill response procedures are provided in Section 9 of this Plan (Spill Response).

CERTIFICATION

MANAGEMENT APPROVAL

This Spill Prevention Control and Countermeasure Plan will be implemented as described herein.

Signature: _____ Date: _____
Don Tjostolvson
Title: Navigation Director

ENGINEER CERTIFICATION

I hereby attest that I am familiar with the provisions of Title 40 Code of Federal Regulations (CFR), Part 112; that I or my agent have examined the Port of Portland's Navigation Facility at 6208 North Ensign Street, Portland, Oregon 97217 (facility); that this Spill Prevention Control and Countermeasure Plan (Plan) has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR, Part 112; that procedures for required inspections and testing have been established; and that the Plan is adequate for the facility.

EXPIRES: 6/30/2022
This digital seal certifies the signatory and document content.

Steven P. Taylor, PE
Principal Engineer

Certificate No. 17921PE
Date: March 4, 2022

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ACRONYMS AND ABBREVIATIONS

CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
Facility	6208 North Ensign Street, Portland, Oregon 97217
OERS	Oregon Emergency Response System
PGE	Portland General Electric
SPCC	Spill Prevention Control and Countermeasure

1 FACILITY INFORMATION

This Spill Prevention Control and Countermeasure (SPCC) Plan has been prepared for the Port of Portland's (the Port) Navigation Base Facility (The Facility).

1.1 Location

The Facility is a 9.15-acre site located at 6208 North Ensign Street, Portland, Oregon 97217, adjacent to the Willamette River in the Swan Island Industrial Park. A site vicinity map is provided as Figure 1-1.

1.2 Site Facilities and Current Operations

The Facility is an equipment maintenance and storage facility used to support river dredge operations. Typical activities for the Facility involve pipe welding, equipment maintenance, fueling, and pesticide mixing. The facility consists of an office building, storage yard area, and moored barges on the adjacent Swan Island Lagoon. A facility map is provided as Figure 1-2. Operating hours are from 7 a.m. to 3 p.m. Monday through Friday (and occasionally on Saturdays).

1.3 Facility Drainage

Upland areas of the site either infiltrate or drain via a stormwater conveyance system. Collected stormwater is conveyed to a pretreatment manhole where it is pumped to an Aquip water treatment system prior to discharge. Discharge from the site enters the City of Portland storm sewer system which discharges to the Swan Island Lagoon. Stormwater on the mooring barges discharges directly to the Swan Island Lagoon. Discharge flow direction is dependent on the list of each mooring barge.

2 PURPOSE AND SCOPE

2.1 Purpose

This SPCC Plan is intended to comply with the regulations of Title 40 Code of Federal Regulations (CFR) Part 112; the sections in this plan are cross-referenced to those requirements. The purpose of this SPCC Plan is to establish procedures, methods, equipment, and other measures to prevent, control, and counter the discharge of harmful quantities of oil into or upon the navigable waters of the United States of America or their tributaries.

40 CFR Part 112 requires an SPCC Plan for owners or operators of non-transportation-related onshore facilities that are engaged in storing, transferring, or consuming oil and oil products; that, because of their location, could reasonably be expected to discharge oil in harmful quantities into or upon navigable waters; and that meet one of the following conditions:

- The aggregate aboveground storage capacity of the facility exceeds 1,320 gallons. Only containers with a capacity of 55 gallons or more are counted.
- Underground oil-storage capacity exceeds 42,000 gallons, unless the underground tanks are subject to all of the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281.

The SPCC requirements are applicable to the facility because the total aboveground storage capacity is greater than 1,320 gallons.

As defined by 40 CFR Part 112, oil includes all grades of motor oil, hydraulic oil, lube oil, fuel oil, gasoline and diesel, automatic transmission fluid, waste oil, and transformer mineral oil. The definition of oil also includes nonpetroleum oils such as animal and vegetable oils and synthetic oils. Throughout the rest of this document, the term "oil" will mean all substances regulated under 40 CFR Part 112.

2.2 Scope

In addition to satisfying a regulatory requirement, this SPCC Plan is intended to be a working document at the facility and used in the following ways:

- As a reference for oil storage and containment system information
- As a tool for informing new employees and refreshing existing employees on practices for preventing and responding to spills
- As a guide for periodic employee training programs
- As a guide to facility inspections
- As a resource during an emergency response

The Port of Portland will maintain a complete copy of this SPCC Plan at the facility.

This SPCC Plan is written specifically to cover operations at 6208 North Ensign Street, Portland, Oregon 97217. See Section 4 for a description of the facility and a discussion of its operations as related to 40 CFR 112.7 and 112.8 SPCC Plan requirements. Implementation of this SPCC Plan will be the responsibility of the Navigation Director. Since this SPCC Plan is a working document, amendments may be necessary at times. See Section 3, as well as the review and amendment log provided in Appendix A, for more information.

2.3 Conformance to Regulations

Procedures have been developed and equipment configured to generally conform to the requirements of 40 CFR 112.7 and 112.8.

2.4 Compliance Matrix

Conformance to the requirements of 40 CFR 112.7 and 112.8 is addressed in specific sections of this SPCC Plan, as identified in the following table.

Citation	Subject	SPCC Plan Section
112.1	General applicability	2
112.3	Requirement to prepare and implement an SPCC Plan	2
112.3(d)	Professional engineer certification	Certification (IV)
112.3(e)(1)(2)	Maintain a copy of the SPCC Plan for on-site review	2.2
112.4(a)	Requirements for a report following a discharge	3, 9.1
112.5(a),(b),(c)	Reasons to amend, five-year review, and certify the SPCC Plan	3
112.7(a)(1)	Discuss conformance with the requirements	2.3
112.7(a)(2)	Equivalent environmental protection	2.5
112.7	Full approval of management	Certification (III)
112.7(a)(3)	Describe physical layout with diagrams	1.2, Figure 1-2
112.7(a)(3)(i)	Type of oil in each container and product volume stored in each	4.1 and Table 1-1
112.7(a)(3)(ii)	Discharge prevention measures (including loading, unloading, and transfers)	5 and 8
112.7(a)(3)(iii)	Discharge controls and secondary containment	4.1, 8.1, and Table 1-1
112.7(a)(3)(iv)	Countermeasures (including contractors)	9
112.7(a)(3)(v)	Disposal of recovered materials	9.2
112.7(a)(3)(vi)	Contact phone numbers	Emergency Contacts (II), Appendix E
112.7(a)(4)	Procedures for spill reporting	9.1.2
112.7(b)	Prediction of spill rate, direction, volume for each major type of failure	4.1
112.7(c)	Description of secondary containment	4.1
112.7(d)	Deviation due to impracticability	2.6
112.7(e)	Inspections	8.2, Appendix F
112.7(f)(1), (3)	Training—content and schedule	7, Appendix C
112.7(f)(2)	Designate person accountable	7.1
112.7(g)	Security—fencing	6.1
112.7(g)	Valves and drains	6.2
112.7(g)	Starter controls	6.3
112.7(g)	Loading connections	6.4

Citation	Subject	SPCC Plan Section
112.7(g)	Lighting	6.5
112.7(h)	Facility tank car and tank truck loading/unloading rack	5.4
112.7(i)	Brittle fracture review for altered tanks	8.2.6
112.7(j)	Conformance with more stringent applicable state and local regulations	2.7
112.7(k)	Qualified oil-filled operating equipment	2.8
112.8(b)	Facility drainage	8.2.3.1
112.8(b)(5)	Discuss when wastewater treatment is continuous	Not applicable
112.8(c)(1)	Bulk storage container compatibility	8.2.2
112.8(c)(2)	Sufficient secondary containment and sufficiently impervious	4.1
112.8(c)(3)	Drainage	8.1 and 8.2.3
112.8(c)(4),(5)	Corrosion control / partially buried	Not applicable
112.8(c)(6)	Tank integrity	8.2.1
112.8(c)(7)	Heating coils	8.2.5
112.8(c)(8)	Tank level alarms	8.2.4
112.8(c)(9)	Observe effluent treatment facilities frequently to detect system upsets due to oil	Not applicable
112.8(c)(10)	Visible leaks from containers are promptly corrected/remove oil from containment	8.2.1, 8.2.3
112.8(d)	Facility transfers, including buried piping	5

2.5 Environmental Equivalence

This SPCC Plan complies with integrity testing requirements by providing equivalent environmental protection through alternative control measures.

Integrity testing requirements for tanks are met by adhering to an inspection and testing protocol based on the Steel Tank Institute Standard for the Inspection of Aboveground Storage Tanks (SP001 6th edition). See section 8.2.1 for the testing schedule.

2.6 Impracticability

The Port is able to meet the general and specific secondary containment requirements of 40 CFR 112 through active and passive secondary containment measures.

A transformer with more than 55-gallons of oil is located at the facility; however, this equipment is not owned or operated by the Port of Portland. The phone number for the utility company, Portland General Electric (PGE), is provided on the spill response phone list on Page II of this document.

2.7 Conformance with More Stringent Applicable State and Local Regulations

The Port will comply with the State of Oregon's requirement to notify regulators of a spill of any amount to, or that is likely to contact, the waters of the State of Oregon. Spill reporting procedures are outlined in Section 9 of this SPCC Plan.

2.8 Qualified Oil-Filled Equipment

The alternative requirements for qualified oil-filled operating equipment are not implemented at the Port of Portland Navigation Facility. In accordance with 40 CFR 112.7(c), the Port of Portland Navigation Facility will employ active secondary containment measures to contain leaks or spills from oil-filled equipment. These active secondary containment measures are outlined in a Contingency Plan, which is provided in Appendix B.

3 SPCC PLAN REVIEW AND AMENDMENT REQUIREMENTS

This SPCC Plan will be amended whenever there is a change in facility design, construction, operation, or maintenance that materially affects the potential for discharge of oil into or upon the navigable waters of the United States of America. Amendments will be incorporated as soon as practical, but not later than six months after such changes are made.

Additionally, a professional engineer will complete a review and evaluation of this SPCC Plan at least once every five years. Based on this review and evaluation, this SPCC Plan will be amended within six months of the facility change to include more effective prevention and control technology, if appropriate. Any time a facility change or review and evaluation requires SPCC Plan technical amendments, a professional engineer will recertify this SPCC Plan, consistent with 40 CFR Parts 112.3(d) and 112.5(b) and (c).

Each review or amendment to this SPCC Plan will be documented in the review and amendment log provided in Appendix A. Documentation shall include a summary of the review or amendment; the number, date, and plan sections affected by the review or amendment; and the name and signature of the person completing the review or amendment.

Facility information related to this SPCC Plan must be submitted to the U.S. Environmental Protection Agency (EPA) regional administrator whenever the facility discharges more than 1,000 gallons in a single event, or more than 42 gallons of oil in each of two spill events within a 12-month period.

Such facility information will include, at a minimum:

- Name and address of the facility
- Maximum storage or handling capacity of the facility and normal daily throughput
- Corrective action and countermeasures 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 that made 40 CFR Section 112.4(a) applicable to the facility, including an analysis of the system or subsystem in which the failure occurred
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence
- Any other information that the regional administrator may reasonably require that is pertinent to this SPCC Plan or the discharge

4 POTENTIAL SPILL SOURCES AND SPCC FEATURES

Petroleum products contained within storage tanks and containers at the Facility are summarized in Table 1-1.

Several containers may be located on site on a seasonal basis when dredging operations are not being conducted. Containers that are temporarily staged on land are included in this SPCC.

One PGE-owned transformer that contains approximately 200 gallons of oil is located on site and does not have secondary containment. Contact information for PGE is provided on the Emergency Notification Phone List on Page II of this Plan.

Petroleum products are stored and/or dispensed at the following locations.

4.1 Maintenance Yard

A 300-gallon diesel tank (AST-4) is located in the maintenance yard on the north side of the Facility (see Figure 1-2). Discharges and leaks from AST-4 would be contained within the interstitial space of the double walled steel housing.

As shown on Figure 1-2, petroleum products may also be stored in 55-gallon drums and totes along the northern property boundary (in Drum Storage Area 1, or DS-1). Potential petroleum products stored here include gear oil, drive train fluid, and gasoline/diesel mix. As shown on Table 1-2, plastic containment provides secondary containment for all containers.

P-1 (tank truck), P-2 (tank trailer), and P-3 (generator tank attached to shore van) are located at the Facility on a seasonal basis when dredging operations are not being conducted. P-1 and P-2 are double-walled steel tanks and P-3 is equipped with secondary containment.

4.1.1 Potential Spill Scenario (40 CFR Part 112.7(b))

Discharges and leaks from the 300-gallon diesel tank (AST-4) would be contained within the interstitial space of the double walled steel housing. If the inner and outer shell of the tank leaked or was breached, oil would flow south towards an on-site catch basin. There is a stormwater treatment system downstream of this catch basin, which would serve as additional spill containment. The most likely cause of a spill would be during transfer operations or puncture, rupture, or leakage from the tank. The discharge rate could range from a slow leak to an instantaneous release of up to 300 gallons. Secondary containment is provided by the double-wall construction.

The most likely cause of a spill from a container in DS-1 would be during transfer operations. The discharge rate could range from a slow leak to an instantaneous release of up to 55 gallons (drums) or 275 gallons (tote). Leaks from the drums or tote would flow onto the ground in the immediate vicinity. Plastic secondary containment for containers minimizes the potential for spills or leaks.

Spills from the tank truck trailers (1,000-gallons each for P-1 and P-2) and generator tank (67 gallons, P-3) would also likely stay in the portable containment or in the vicinity of the tank. It may be possible for spills to eventually reach Swan Island lagoon during a precipitation event if a leak were to go undetected.

There are four spill kits located throughout the facility, see Figure 1-2 for spill kit locations. A contingency plan, which has been prepared in general accordance with 40 CFR Part 109, is included as Appendix B.

5 TRANSFER OPERATIONS

Section 40 CFR Part 112.7(a)(3)(ii) requires a description of all transfer stations and connecting pipes.

5.1 Underground Piping

There is no underground piping associated with the transfer of oil at the facility.

5.2 Aboveground Piping

No fixed piping systems for filling tanks are in place at the facility.

5.3 Vehicular Traffic

No transfer operations are located in areas subject to vehicle traffic.

5.4 Tank Truck Containment and Warning

The EPA's December 2008 amendments defined a loading/unloading rack as a

> fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.

The EPA clarified that the provisions of 40 CFR 112.7(h) apply only in instances where a rack structure is present. Consistent with these clarifications of the rule, the facility has no tank car or tank truck loading/unloading racks.

The following procedures are used when transferring lubrication oil and used oil to and from barges and the Dredge Oregon:

1. Lubrication oil delivery (4,000 to 5,500 gallons transferred to Dredge Oregon)

    a. A contractor mobile delivery truck is used to supply lubrication oil; this bulk oil is not stored at the facility and is immediately placed aboard the Dredge Oregon.

    b. Transfer hoses are made of material compatible with oil and are owned by the Port of Portland. The hoses are inspected annually and before each use.

    c. Bulk oil delivery comes from a supplier tanker truck that is attended by the operator at all times during transfer.

    d. The delivery operator and Port of Portland staff have radios for communication and alert horns so delivery can be halted in the event of a release.

    e. Port of Portland staff members posted along the hose path to observe potential leaks during transfer.

    f. Spill kits are maintained along the transfer route (typically down gangway, across mooring barge to Dredge Oregon).

    g. Hose couplings are wrapped with sorbent pads.

    h. Upon completion of the transfer, hoses are drained by gravity and disconnected in top-down order. As a segment is disconnected, the hose ends are capped.

2. Used oil transfer from Dredge Oregon

    a. A contractor takes delivery of used oil from Dredge Oregon for off-site recycling using a vacuum mobile tanker truck; used oil from Dredge Oregon is not stored at the facility.

b. The transfer hoses are made of oil-compatible materials, are owned by the Port of Portland, and are inspected annually and before each use.

c. Used oil is handled by a contractor who attends the tanker truck at all times during transfer.

d. The delivery operator and Port of Portland staff have radios for communication and alert horns so delivery can be halted in the event of a leak.

e. Port of Portland staff members posted along the hose path to observe potential leaks during transfer.

f. Spill kits are maintained along the transfer route (typically down gangway, across mooring barge to Dredge Oregon).

g. Hose couplings are wrapped with sorbent pads.

h. Upon completion of the transfer, hoses are drained by continuing to operate the vacuum and are disconnected in bottom-up order. As a segment is disconnected, the hose ends are capped.

The tanker and trailer are occasionally filled while on site. The fueling process is attended by trained personnel. During fueling, containment and absorbent pads are placed under the pump and filter systems. The fuel-dispensing nozzle is equipped with automatic shut-off and placed in a containment hose to collect drops when fueling is complete.

Fuel may be dispensed from tanks to equipment at various locations throughout the facility, spill kits are located near fuel dispensing locations.

6 SECURITY

6.1 Fencing (40 CFR, Part 112.7(g))

The facility's perimeter is fenced and locked after business hours. Unauthorized personnel are not allowed at the facility. Entry is through a locked gate requiring a key or pass code. The waterfront is monitored by a recording security camera system. Docked vessels are equipped with alarms.

6.2 Aboveground Valves and Piping (40 CFR 112.7(g))

When in non-operating or non-standby status, valves on the lines that permit direct outward flow from an oil storage container are securely padlocked in a closed position.

6.3 Starter Controls (40 CFR, Part 112.7(g))

Starter controls on oil pumps are locked in the off position when they are in non-operating status. The controls are located so that they are accessible only to authorized personnel.

6.4 Loading and Unloading Connections (40 CFR, Part 112.7(g))

Loading and unloading operations are supervised by responsible personnel.

6.5 Facility Lighting (40 CFR, Part 112.7(g))

The facility has adequate lighting to assist with detection of discharges, releases, or acts of vandalism.

7 PERSONNEL TRAINING

7.1 Personnel Training (40 CFR, Part 112.7(f)(1))

The Port has designated the Navigation Director as the individual who is accountable for discharge prevention and who reports to facility management.

New employees are required to complete online environmental training. Facility personnel are properly instructed in the operation and maintenance of equipment to prevent the discharge of oil; discharge procedures protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. The personnel operating the Facility are instructed regarding their job responsibilities and duties. Personnel are under the direct supervisions of a foreman who is responsible for establishing daily performance and duty guidelines.

Periodic safety meetings are held to discuss safety procedures and other pertinent job responsibility criteria. In addition, SPCC training/discharge prevention briefings for oil-handling personnel are conducted, as required, at least one a year. This training covers the content of the SPCC Plan, known discharge events or failures, malfunctioning components, and recently developed precautionary measures.

7.2 Documentation for Training

An example training log is included in Appendix C. SPCC training documentation will be maintained in the Port of Portland online Learning Management System and be retained for at least three years.

8 DISCHARGE PREVENTION PROCEDURES

8.1 SPCC Features and Operating Procedures (40 CFR 112.7(a)(3) and 112.8)

The Facility employees are trained to implement spill prevention practices for work with and around oil sources. Personnel shall use common sense and relay on spill prevention practices at all times to minimize the potential for a release of oil.

For example, the following "common sense" practices are recommended:

- Keep container lids securely fastened at all times.
- Do not leave portable sources unattended (outside).
- Label contents of containers stored on site.
- Return portable sources to their storage locations after use.
- Use pads, drip pans, and funnels when transferring petroleum products from a portable container.
- Protect oil sources from damage that could be caused by moving equipment.
- Keep secondary containment valves closed at all times except when discharging clean stormwater.
- Water in the secondary containment areas that shows a light sheen shall be discharged through an oil/water separator. Heavier accumulations will be removed and disposed of by a qualified waste contractor.
- Do not store oil sources near catch basins or floor drains.
- Loading and unloading of petroleum products shall be attended at all times.

Spill prevention during oil deliveries (offloading) is the primary responsibility of the supplier until the product is safely in the tank or vessel.

8.2 Tests and Inspections (40 CFR 112.7(e) and 112.8(c)(6))

The personnel at the facility shall perform or coordinate the testing, inspection, and maintenance of petroleum equipment to keep it performing in an efficient and environmentally sound manner. The tests and inspections shall be conducted as discussed in the following subsections.

8.2.1 Inspecting and Testing Bulk Storage Containers

Visual inspections of the containers, including secondary containment systems, are performed during routine activities at the facility. In addition, the exteriors of the containers are inspected for signs of deterioration, discharges, or accumulation of oil. Any indication of deterioration or leakage that may cause a discharge or accumulation of oil inside containment areas is reported to appropriate personnel. The following identifies the management, preventative maintenance, housekeeping, and inspection practices for:

- Aboveground Storage Tanks
  - Tanks are monitored during filling to avoid overfilling.
  - Tanks are contained, monitored, and inspected to detect potential release of hydrocarbons.
  - Visual inspections of the tank and seams are conducted to identify signs of deterioration and/or leaks, particularly at seams, welds, and flanged connections, which might cause a spill or accumulation inside diked areas.
  - With the exception of active product lines, the valves on the tanks are kept in the closed position when not in use.
- Drum Storage Areas
  - The established drum storage area (DS-1) is shown on Figure 1-2. Drums with product are not to be stored outside of this designated area.
  - Empty drums may be stored in the maintenance yard. Drums containing oil will not be stored outside of containment equipment.
  - Drum storage areas are inspected regularly to identify leaks and drum deterioration.
  - Drums are properly labeled to indicate the contents and accumulation dates, if applicable.
  - Drums are kept closed when not in use.
  - Employees are present while the drum contents are dispensed or transferred to oversee operations and stop or control leaks and spills.

Tank integrity is evaluated in a program based on STI Method SP001 (6th edition). Monthly visual inspections are adequate for tanks with a capacity of less than 5,000 gallons that are provided with spill control and secondary containment. Therefore, integrity testing at the facility is not routinely conducted and the monthly facility inspections are considered adequate. If tanks are integrity tested, contractor documentation will be included in Appendix D of the on-site SPCC Plan.

Inspections are conducted monthly on tanks, containers, piping, valves, and containment areas. The following inspection forms/records are required:

1. Spill Response Notification Form (completed/stored digitally on VEOCI, see 9.1.1 below)
2. Monthly Facility Inspection Form (Appendix F)
3. Drainage Inspection Log (Appendix G)
4. SPCC Employee Training Log (Appendix C)

The written procedures and completed forms/records will be kept for at least three years. Forms that are completed digitally and will be available on request, and paper forms will be kept in Appendix D of this SPCC plan. Inspection records will be kept for at least three years.

Per 40 CFR Part 112.2, oil-filled electrical, operating, or manufacturing equipment is not considered bulk storage containment; therefore, this type of equipment is not covered by the requirement to perform integrity testing.

8.2.2 Bulk Storage Container Maintenance

Storage containers are compatible with their contents and with conditions of storage such as temperature and pressure.

8.2.3 Secondary Containment of Stormwater

Fixed secondary containment structures for containers and drums at the facility are covered and do not collect precipitation.

8.2.4 Tank-Level Alarms

All tanks (AST-4, P-1, P-2, and P-3) are double walled and equipped with leak detection gauges. 55-gallon drums are not equipped with alarm devices; however, these containers are not typically filled on site. Dispensing product from containers is continuously monitored by personnel. Dispensing product is typically conducted using an air-operated oil transfer pump with a maximum flow rate of less than 10 gallons per minute.

8.2.5 Monitoring Leakage in Internal Heating Coils

There are no internal heating coils in oil-filled tanks at this facility.

8.2.6 Maintenance of Field-Constructed, Aboveground Containers (112.7(i))

No field-constructed aboveground containers are in place at this facility.

9 SPILL RESPONSE (40 CFR 112.7(A)(3)(IV) AND 112.7(C))

In the event of a spill or release, the spill response procedures outlined in Appendix E will be followed. These actions may include, but are not limited to, the following:

- If it is safe to do so, initial response will control and contain the spill to the fullest extent of the personnel's capabilities, using available spill equipment stored on facility property.
- Determine if the spill qualifies as an emergency or non-emergency spill and call the appropriate contact listed in Appendix E (also listed on Page II of this Plan).
- Complete a spill response notification form on VEOCI.

Countermeasure procedures for the facility are provided in the contingency plan included in Appendix B. In addition, the Port has contracted with response contractors to provide spill response and cleanup for this facility. Contact names and phone numbers for these response contractors are included on Page II of this Plan.

The Port has administrative policies related to responses to disaster that are relevant to spill control and countermeasures. Port of Portland Administrative Policy No. 7.1.11 specifies Port staff roles and responsibilities during a disaster. These roles follow the Unifies Incident Command model.

The Port Administrative Policy No. 7.2.3 describes Contracting and Expenditure Authority and has provisions to allow the highest-ranking Port employee to execute contracts and expenditures that are immediately necessary for the preservation of life, safety, or Port property. The policy also allows, if the emergency so requires, for commencement of work prior to a written contract.

9.1 Notification and Reporting (40 CFR 112.4(a) and 112.7(a)(4))

9.1.1 On-Site Notification and Reporting

In the event of a spill, Facility personnel are instructed to contact the personnel listed in Appendix E. The personnel listed in Appendix E will be responsible for contacting the appropriate authorities and, when necessary, emergency response contractors.

Spill response activities will be recorded as they are performed and summarized in a third-party incident reporting software (VEOCI). Spill response activity reports are stored in VEOCI and are available for review upon request.

9.1.2 Notification of Regulatory Authorities

Spills must be immediately reported to marine security (if deemed an emergency spill) or the immediate supervisor (if deemed a non-emergency spill) so that notification of authorities (if necessary) can be initiated. Regulators will be informed following the guidelines provided below:

- Oil spills of any amount to, or that are likely to contact, waters of the state (including coastal waters, lakes, rivers, groundwater [e.g., wells, drain fields, and sewers] and stormwater) must be reported immediately (within one hour) to the **Oregon Emergency Response System (OERS) at 1-800-452-0311** and the **National Response Center at 1-800-424-8802**.
- Oil spills of more than 42 gallons to land that are not likely to contact waters of the state must be reported to the **OERS at 1-800-452-0311** within one hour. Land includes soil, gravel, and concrete or asphalt pads, but not secondary containment or spills to the indoors that do not have the potential to reach waters of the state (no drains or other release points).
- Release of hazardous materials equal to, or greater than, the quantity listed in 40 CFR Part 302 (List of Hazardous Substances and Reportable Quantities) requires immediate notification of the **National Response Center at 1-800-424-8802** and of the **OERS at 1-800-452-0311**.
- If there is a danger to life, health, or the environment, contact the local public emergency services at **911**.
- Spills of any amount that threaten public health or safety must be immediately reported to local emergency responders by calling **911**.

It is not necessary to report spills to secondary containment or indoors with no potential for release to the environment (e.g., no floor drains).

The time, date, and details of any emergency incident will be documented digitally in VEOCI, and records/reports of these incidents are available for review upon request.

9.2 Spill Response Equipment and Waste Disposal (112.7(a)(3)(v))

Spill response kits kept on site shall also be checked during inspections (see Appendix F) and restocked as necessary. Spill response equipment are placed in the locations described in Appendix B; the locations are identified on Figure 1-2.

These spill kits are equipped with the following materials:

- Absorbent pads (one bundle)
- Absorbent booms (one bale)
- Granular absorbent material (one bundle)

The spill kits may include these additional items as needed:

- Safety goggles and gloves
- Drum or other container to hold contents of spill kit
- Drums, bags and ties, or other containers to hold contaminated materials
- Barricades, barrier tape, and/or traffic cones
- Non-sparking shovels
- Brooms
- Drain seals/plugs/mats

In general, wastes resulting from a spill response will be containerized, characterized for disposal, and removed from the site by a licensed waste hauler or the Port's Environmental staff. Typical disposal methods and procedures that may be employed at the facility include:

- Recovered product may be pumped to a used oil tank or container and stored on site and, if possible, reused. If reuse is not possible, recovered produce may be hauled to an off-site recycler or disposal site.
- Contaminated soil may be stockpiled and protected on site for subsequent disposal at an appropriate facility.
- Contaminated equipment and materials, including drums, tanks, parts, valves, and shovels will be cleaned as appropriate and any resides will be collected.
- Personal protective equipment, decontamination solutions, spent chemicals, and sorbents are drummed and stored for disposal.

Actual disposal methods will depend on the volume of the release and its condition. A response contractor or the Port's Environmental staff will transport contaminated material from the site for proper disposal; a list of approved contractors is included in the contact list on Page II of this Plan. Spilled residues and other materials contaminated by spilled oil will be characterized using applicable Safety Data Sheets, generator knowledge, laboratory analyses, or other available information as appropriate. Following characterization, these residues and materials will be disposed off site in a manner consistent with applicable regulations (Resource Conservation and Recovery Act, Oil Pollution Act, and others).

10 SUBSTANTIAL HARM CRITERIA CHECKLIST

Appendix H contains the checklist required under 40 CFR 112.20(e), documenting that a response plan specific to the facility is not required.

LIMITATIONS

The services undertaken in completing this document were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This document is solely for the use and information of our client unless otherwise noted. Any reliance on this document by a third party is at such party's sole risk.

Opinions and recommendations contained in this document apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this document.

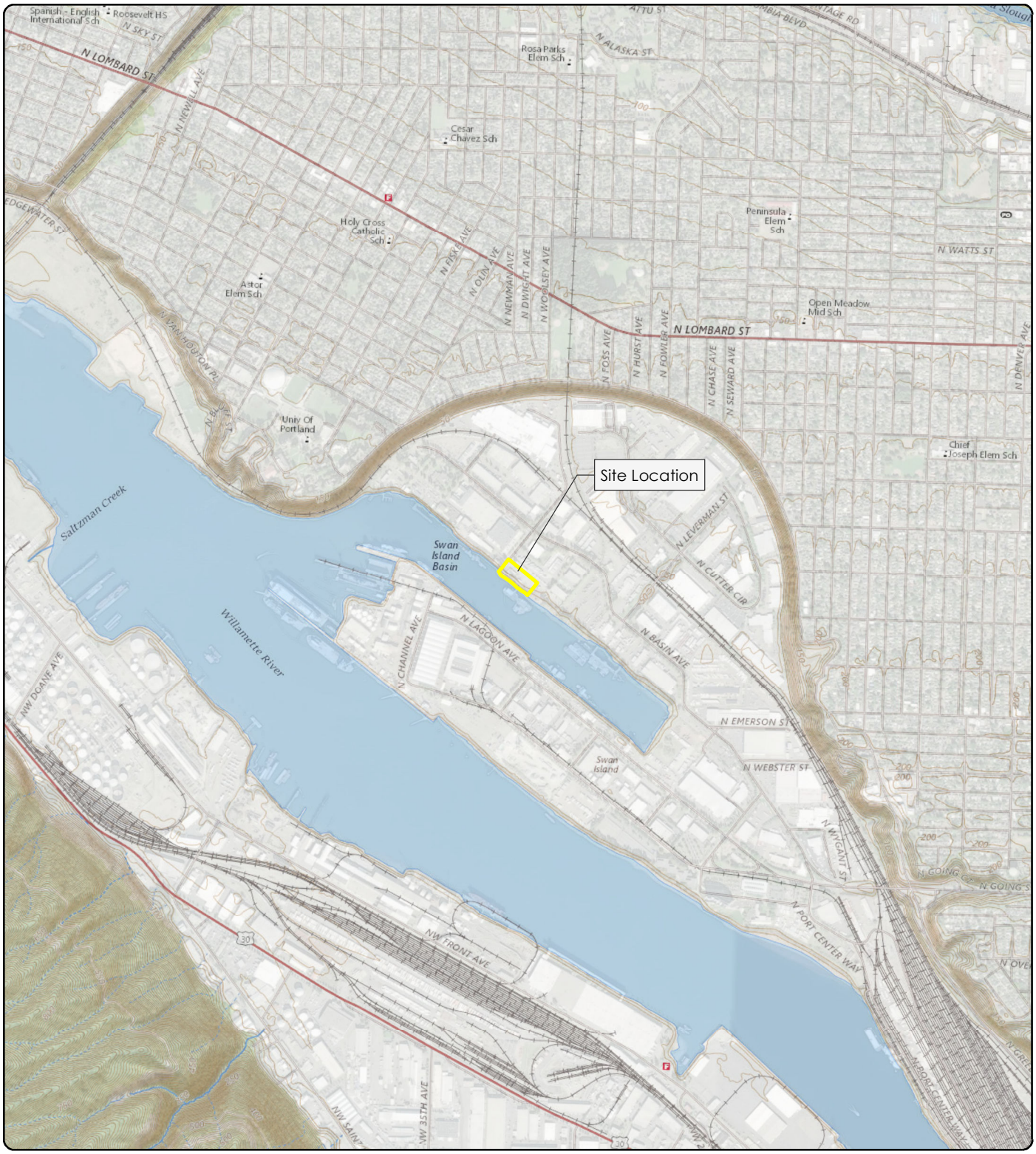
TABLE

Table 1-1
Bulk Storage Containers and Spill-Prevention Features
Port of Portland Navigation Base
Portland, Oregon

Unit ID	Location	Contents	Volume (gallons)	Number of Drums/Totes	Container Material	Compatible with Material Stored	Type of Failure	Direction of Flow (estimated)[3]	Secondary Containment		Spill Prevention			Loading and Unloading	
														Dispenser	
									Volume (gallons)	Material of Construction	Leak Detection	Level Gauge	Overfill Protection	Type	Drip Catcher
Aboveground Storage Tanks and Containers															
AST-4	Maintenance Yard	Diesel	300	NA	Steel	Yes	Leaks/structure	North	>300	Double-walled steel	Gauge		Direct Vision and Immediate Response	Hand Held	Yes
Other Storage Containers (Drums, Totes)															
DS-1[1]	Maintenance Yard	Gear oil, drive train fluid	55	3	Steel	Yes	Leaks	South	>1,650	Plastic, covered drum containment unit	None	Not Applicable	Not Applicable	Not Applicable	Not Applicable
TS-1	Maintenance Yard	Gasoline/diesel mix	275	1	Plastic	Yes	Leaks	South	Not Applicable	None	None	Not Applicable	Not Applicable	Not Applicable	Not Applicable
P-1[2]	Maintenance Yard	Diesel	1,000	1	Steel	Yes	Leaks	South	>1000	Double-walled	Leak detection gauge	Not Applicable	Direct Vision and Immediate Response	Not Applicable	Not Applicable
P-2[2]	Maintenance Yard	Diesel	1,000	1	Steel	Yes	Leaks	South	>1000	Double-walled	Leak detection gauge	Not Applicable	Direct Vision and Immediate Response	Not Applicable	Not Applicable
P-3[2]	Shore Van	Diesel (generator tank)	67	1	Steel	Yes	Leaks	East	>67	Diked/double-walled	Gauge	Not Applicable	Direct Vision and Immediate Response	Not Applicable	Not Applicable

Notes:
(1) Drums are not equipped with gauges; drums are not filled on site.
(2) Containers are located on site on a seasonal basis (i.e., when dreding is not being conducted).

FIGURES



Source:
U.S. Geological Survey (2021) 7.5-minute topographic quadrangle: Portland.
Township 1 North, Range 1 East, Section 17.
Property boundary obtained from Oregon Metro RLIS.

Legend

Site Boundary

Figure 1
Site Location

Port of Portland
Navigation Facility
6208 North Ensign Street
Portland, Oregon 97217

0 1,000 2,000
Feet

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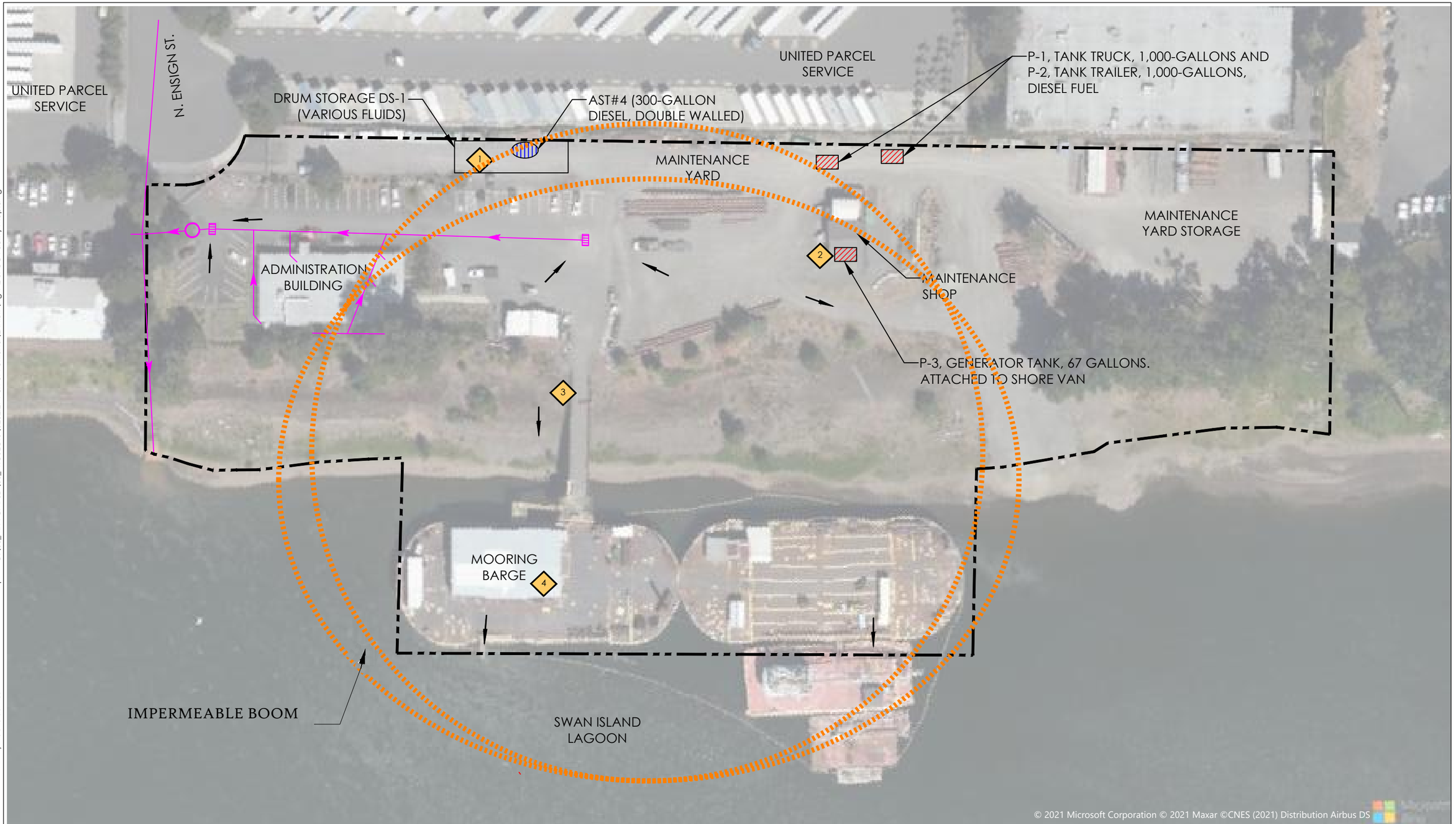
p. 971 544 2139 | www.maulfoster.com

Path: X:\0232.29\Projects\Fig1_1_Site_Location.mxd
Print Date: 8/26/2021
Reviewed By:
Produced By: jelstrott
Project: 0232.29



Filepath:G:\00_MFA Civil 3D\00_PROJECTS\0232.29 Port of Portland\EXHIBIT\Fig 1-2 SPCC Facility Map.dwg

Printed by:Brooke James

Date: 2/3/2022 10:30:35 AM

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971.544.2139 (phone) | www.maulfoster.com

0 80' 160'

NOTE: BAR IS ONE INCH ON ORIGINAL DRAWING. IF NOT ONE INCH ON THIS SHEET, ADJUST SCALE ACCORDINGLY.

LEGEND

- MOBILE TANK TRUCK/TRAILER
- SPILL KIT LOCATIONS
- MANHOLE
- CATCH BASIN
- STS PIPE AND FLOW DIRECTION
- SURFACE WATER FLOW DIRECTION
- SPCC COVERAGE BOUNDARY
- ABOVE GROUND STORAGE TANK

Figure 1-2
Facility Map
Navigation Base
Portland, Oregon

APPENDIX A

SPCC PLAN REVIEW AND AMENDMENT LOG

PORT OF PORTLAND, NAVIGATION FACILITY
SPCC PLAN REVIEW AND AMENDMENT LOG

I have completed review and evaluation of the SPCC Plan for the Port of Portland Navigation Facility and will/will not amend the SPCC Plan as indicated below.

Review Date	Will Amend	Reviewer Name	Reviewer Signature
4/3/2019	Yes / No	Blake Hamalainen	See previous versions
02/xx/2022	**Yes** / No	Steven Taylor, PE, Maul Foster & Alongi, Inc.	
	Yes / No		
	Yes / No		
	Yes / No		
	Yes / No		

Amendment Number	Description of Amendment	Date	Reviewer Name	Reviewer Signature
0	Reformat and update entire plan.	10/XX/2021	Steven Taylor, PE	

APPENDIX B
CONTINGENCY PLAN

PORT OF PORTLAND
NAVIGATION BASE FACILITY

OIL SPILL CONTINGENCY PLAN

1.1 Notification Procedure

In the event of an oil spill incident, facility personnel on-duty will take immediate action to notify the Port personnel identified on the list of emergency telephone numbers on Page II of the SPCC Plan. The designated person (or coordinator) accountable for oil spill prevention is responsible and required by federal and state laws to notify the applicable federal, state, and local agencies provided on the list.

1.2 Spill Contingency Plan

In the event of an oil spill incident, facility personnel will follow the procedures outlined below:

- If safe, CONTROL THE SOURCE OF THE SPILL
- Stop flow of product (secure valves and pumps)
- Shut off ignition sources, if applicable.
- If safe, CONTAIN THE SPILL TO THE SMALLEST POSSIBLE AREA
- CALL YOUR SUPERVISOR FOR FURTHER INSTRUCTIONS
- REPORT THE SPILL TO PROPER SPILL REPORTING AGENCIES AS REQUIRED

1.3 Spill Control Procedures

An oil spill incident could occur at the facility from the following situations:

- Hydraulic line rupture
- Storage tank rupture
- General rupture or failure within PGE-owned transformer
- Spill during loading/offloading operations
- Spill during fueling operations

Should a spill incident occur, facility personnel will immediately implement the following spill control measures to prevent a spill from entering navigable waters:

- Hydraulic line rupture
  - Turn off pump
  - Ensure that spilled oil is contained (see Section B4.0, Countermeasure Procedures)
  - Pump used oil into drums or other containers away from surface water or storm drains
- Storage tank rupture
  - Ensure that spilled fuel or oil is contained (see Section B4.0, Countermeasure Procedures)
  - Add water to provide layer of water on bottom
    Pump used oil into drums or other containers
- Spill during fueling operations
  - Turn off pump
  - Ensure that spilled fuel is contained
  - Pump spilled fuel into drums or other containers

- Rupture or failure within PGE-owned transformer
  - Ensure that spilled oil is contained (see Section B4.0, Countermeasure Procedures)
  - Pump used oil into drums or other containers

1.4 Countermeasure Procedures

Once the spill control procedures outlined above have been implemented, facility personnel initiate countermeasure activities to contain, cleanup, and mitigate the effects of a spill that could impact navigable waters. Furthermore, incident-specific considerations and precautions must also be implemented during each spill incident to adequately protect human health and the environment.

The facility's countermeasure procedures are outlined below.

Containment. Containment activities are initiated as soon as safely possible to prevent spreading of the spilled material. Containment techniques include, but are not limited to:

- Trenching and diking
- Filter fences
- Booms

Removal. Once the spill is contained, removal techniques include, but are not limited to:

- Pumps
- Sorbents (pads, pillows, or booms)
- Skimmers
- Vacuum trucks

Disposal. After the spill is contained, the site is cleaned up. This includes recycling any recovered oil, disposing of abatement materials used to contain and/or remove the spill, and excavating contaminated soil following all applicable laws and regulation. Disposal techniques include, but are not limited to:

- Recycling
- Disposal at an appropriate facility

1.5 Emergency Response Equipment Location

The following table identifies the type and location of the emergency response equipment available at the facility

Identification	Location
Spill Kit #1	Adjacent to drum storage area (DS-1)
Spill Kit #2	Drainage basin A next to the maintenance shop
Spill Kit #3	Entrance to mooring barge ramp
Spill Kit #4	Southeast corner of the barge shop

Additional spill response equipment such as pumps, booms, and additional absorbents are available on a 24-hour basis from the emergency response contractors listed on the Emergency Notification Phone List.

1.6 Spill Cleanup Training

Appropriate Port personnel are trained in incidental spill cleanup procedures and how to use available Port cleanup equipment including absorbent mats, scoop shovels, brooms, and a highly absorbent sweeping compound. 55-gallon drums are designated for receiving spilled materials. Fire extinguishers and ventilation equipment are also available at the facility.

APPENDIX C

SPCC EMPLOYEE TRAINING LOG

PORT OF PORTLAND
NAVIGATION BASE FACILITY

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
EMPLOYEE TRAINING LOG

Note: New employees shall receive initial training in the contents and implementation of the SPCC Plan upon start of their employment. All employees shall receive annual refresher training.

SPCC Initial and Annual Training Agenda
• An introduction to pollution control laws • Contents of SPCC Plan • Rules and regulations pertaining to the use and storage of petroleum products • Inspection, operation, and maintenance of spill equipment and petroleum storage and dispensing equipment • Spill response and cleanup • Spill notification and recordkeeping • Spill prevention practices

Instructor(s): _____

Date and Time of Training: Start: _____ Finish: _____

Names of Employee Attending	Employee Signatures

The training conducted on _____ identified the following corrective actions to be taken:

APPENDIX D

COMPLETED FORMS

APPENDIX E

SPILL RESPONSE PROCEDURES

PORT OF PORTLAND
NAVIGATION BASE and Dredge OREGON
SPILL RESPONSE PROCEDURES

#1 If it is safe to do so **CONTROL** the source of the spill. STOP the flow.

#2 If it is safe to do so **CONTAIN** the spill to the smallest possible area.

#3 Refer below to determine if this spill qualifies as an Emergency or Non-Emergency Spill and **CALL** the appropriate contact.

Emergency & Non-Emergency Spill Determination

Determine if this is an Emergency or Non-Emergency Spill and then use the table below to notify the appropriate contact. This is an Emergency Spill if one or more of the following is true:

- ☐ Spill enters or has the potential to enter the storm system or surface waters of the state
- ☐ Spill creates an immediate threat to human health or the environment
- ☐ Spill impacts operations or impacts an area of 50ft^2 or more
- ☐ Spill exceeds the reportable quantity (for petroleum products the reportable quantity is 42-gal)
- ☐ Spill is an unknown substance
- ☐ Spill cannot be cleaned or is not cleaned by the responsible party

---

Port of Portland Emergency Spill Notification Contact List

Prioritized Contact	Responsibility Role	Phone Number
(1) First Call: PDX Comm-Center	Notifies appropriate spill response personnel	Comm-Center 503-460-4000(Emergency)
(2) Second Call: Don Tjostolvson, Navigation Director	Incident Command and Control	Don 503-240-2202 (office) 503-703-4912 (mobile)

Port of Portland Non-Emergency Spill Notification Contact List

(1) First Call: Your Immediate Supervisor	Supervisor or delegate verifies the Responsible Party adequately cleans the spill	NA

APPENDIX F

MONTHLY FACILITY INSPECTION FORM

FORM 1
MONTHLY FACILITY INSPECTION FORM
Port of Portland
Navigation Base Facility

Inspected by: _____ Signature: _____ Date: _____

Location	ID	Contents	Capacity (Gallons)	Condition OK = Acceptable X = Not Acceptable NA = Not Applicable			Comments
				Container	Valves and Appurtenances	Secondary Containment	
ASTs/USTs							
Maintenance Yard	AST-4	Diesel	300				
Portable Containers, Totes, Drums, and Temporary Equipment							
Maintenance Yard	DS-1	Various Oils	Up to 30, 55-Gallon Drums		NA		
Maintenance Yard	P-1	Diesel	1,000				
Maintenance Yard	P-2	Diesel	1,000				
Maintenance Yard	P-3	Diesel	67				

Procedures: At each noted location, visually inspect and note any deficiencies for the following equipment and/or systems **(as applicable)**:

Check Tanks For:
- Signs of leaks
- Shell distortion
- Signs of settling
- Corrosion
- Tank coatings, insulation, and general exterior
- Condition of tank foundation/supports
- Emergency vents
- Leak detection (if applicable)
- Water in tank
- Water in interstitial space

Check Piping and Valves For:
- Signs of leaks
- Support integrity
- Insulation
- Valves locked as appropriate
- Unused pipes blind-flanged

Check Containment Area For:
- Signs of spills
- Site drainage
- Integrity
- Valves sealed closed

Deficiencies should be noted in the comments column or additional comments section.

Completed forms are to be kept with the Master Copy of this plan.

Additional Comments: _____

_____

_____

_____

_____

APPENDIX G

DRAINAGE INSPECTION LOG

Drainage Inspection Log
Port of Portland Navigation Base
Portland, Oregon

Date/Time of Drainage Activity	Tank/Container Contents	SPCC Tank/Container No.	Oil/Sheen Observed?	Drainage Method Drained/Pumped To	Approximate Volume Drained/Pumped (gallons)	Discharge Conducted By	Signature

APPENDIX H

SUBSTANTIAL HARM CRITERIA CHECKLIST

SUBSTANTIAL HARM CRITERIA APPLICABILITY FOR CERTIFICATION
(40 CFR 112.20(e), APPENDIX H)

FACILITY NAME: Port of Portland, Navigation Facility

FACILITY ADDRESS: 6208 North Ensign Street
Portland, Oregon

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes ____ No _X_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes ____ No _X_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   Yes ____ No _X_

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
   Yes ____ No _X_

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
   Yes ____ No _X_

CERTIFICATION

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

Name (please type or print)	Signature
Title	Date