PORT OF PORTLAND
TERMINAL 2
3556 NW FRONT AVENUE
PORTLAND, OREGON

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Prepared for
PORT OF PORTLAND
TERMINAL 2
Revised December 5, 2022
Project No. M0232.35.005

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

MAUL
FOSTER
ALONGI

CERTIFICATION

MANAGEMENT APPROVAL

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

David J Breen

David Breen
Senior Manager of Environmental Mixed Media

Date: 01/06/2024

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 facility at 3556 NW Front Avenue, Portland, Oregon (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: 6/30/2024
This digital seal certifies the signatory and document content.

Steven P. Taylor, PE
Principal Engineer

Date: December 5, 2022

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ILLUSTRATIONS

FOLLOWING PLAN:

ACRONYMS AND ABBREVIATIONS

CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
facility	3556 NW Front Avenue in Portland, Oregon
OERS	Oregon Emergency Response System
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 (the Port) Terminal 2 at 3556 NW Front Avenue in Portland, Oregon ("the Facility").

1.1 Location

The Facility is located at 3556 NW Front Avenue in the City of Portland in Multnomah County, Oregon (see Figure 1-1). The Facility is approximately 57 acres consisting of six parcels. Portions of the Facility are leased to and controlled by tenants. Tenant occupied areas are excluded from this SPCC as tenants are responsible for complying with federal and state SPCC regulations in accordance with their operations.

The Facility is bordered to the west by several commercial and industrial properties as well as a fire station, to the north by the Willamette River, to the east by several commercial and industrial properties, and to the south by NW Front Avenue followed by several commercial properties.

1.2 Site Facilities and Current Operations

The current facility layout is shown on Figure 1-2. The Facility is used by the Port as a marine transportation facility used for marine cargo handling. The Facility consists of an administrative office building, cargo staging and storage areas, a low dock area, two high berth areas, and three warehouses.

The majority of the Facility is currently vacant or leased. The interiors of the warehouse, aside from some equipment stored within Warehouse 204, and fenced yards are leased and controlled by tenants and are excluded from this SPCC Plan.

Petroleum products handled or stored at the Facility are described in Section 4 and shown on Figure 1-2.

The Facility is currently inactive; however, maintenance staff are typically at the Facility on weekdays from 7:00 a.m. to 3:00 p.m.

1.3 Waterways and Site Drainage

In general, the Facility is topographically flat. Approximately 48 acres of the Facility are covered with buildings or are paved. The remaining area of the Facility consists of pervious areas consisting of landscaping and a rip rap riverbank.

With the exception of the docks on the northern and eastern borders of the site, stormwater runoff from the Facility is collected in catch basins and conveyed to the Willamette River by two main storm lines. The dock areas along the northern and eastern boundaries of the Facility are supported by piers

directly above the Willamette River. These docks contain numerous scupper and rail drains, through which stormwater runoff drains directly to the Willamette River.

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.

An SPCC Plan is required by 40 CFR Part 112 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, to be 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 will maintain a complete copy of this SPCC Plan at the facility.

This SPCC Plan is specifically written to cover operations at the Port. 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 David Breen, Senior Manager of Environmental Mixed Media. 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	Certifications (pg. III), 3
112.3(e)	Maintain a copy of the SPCC Plan for on-site review	2.2
112.4(a)	Requirements for a report following a discharge	3
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	2.2, 2.3
112.7(a)(2)	Equivalent environmental protection	2.5
112.7	Full approval of management	Certifications (pg. II)
112.7(a)(3)	Describe physical layout with diagrams	1.2, 1.3, Figures 1-1 and 1-2
112.7(a)(3)(i)	Type of oil in each container and product volume stored in each	4.1 Table 2
112.7(a)(3)(ii)	Discharge prevention measures (including loading, unloading, and transfers)	5, 8
112.7(a)(3)(iii)	Discharge controls and secondary containment	4.1 and 8.3
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	9.1.1
112.7(a)(4)	Procedures for spill reporting	9.1.2

Citation	Subject	SPCC Plan Section
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 D
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, Not applicable
112.7(g)	Loading connections	6.4, Not applicable
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	1.3
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	4.1, Figure 2
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	8.2.2
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 4th edition).

2.6 Impracticability

The Facility does not have bulk oil storage containers aside from oil-filled equipment (discussed in Section 2.8) below; therefore, this section is not applicable.

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

Qualified oil-filled operational equipment for the Facility includes seven (7) transformers located throughout the Facility.

Three of the seven transformers meet the general secondary containment requirements described in 40 CFR 112.7 (c), the remaining transformers rely on the alternate secondary containment requirements for oil-filled operating equipment. The Port has not had either of the following in the three years prior to the SPCC plan certification date:

- A single reportable discharge from either transformer exceeding 1,000 gallons
- Two reportable discharges from either transformer exceeding 42 gallons in any 12-month period

An oil spill contingency plan for the transformers is included as Appendix B.

2.9 Partially Buried and Bunkered Storage Tanks

There are no partially buried or bunkered storage tanks at the Facility.

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, this SPCC Plan will be recertified by a professional engineer, 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 storage and/or dispensing activities are discussed in the following sections, as well as in Table 4-1 and Figure 1-2.

4.1 Transformers

A spill could occur from an oil-filled operational equipment leak from a puncture. Potential spills could be slow leaks or in volumes of up to 290 gallons (capacity of the largest transformer [MT2-089]).

Oil-filled electrical transformers containing between 100 and 290 gallons of oil each are shown on Figure 1-2. Transformers in the SSA Marine (SSA) Equipment Storage Area as well as the transformer located south of Warehouse 205 have a concrete curb with secondary containment. The remaining transformers are surrounded by a concrete curb but have a pervious floor.

As a conservative measure, an oil spill contingency plan for the transformers is included as Appendix B. All transformers on site are marked "No PCBs" (polychlorinated biphenyls).

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

Transformers MT2-087, MT2-088, MT2-089, and MT2-090 are all located in small pervious areas with concrete curbs. Potential spills in these locations would infiltrate into the ground prior to any sheet flow occurring to surrounding areas within the Facility. If a release were to escape the concrete curbing, oil would likely flow across pavement towards the Facility's storm drain system, which comprises several catch basins and pipes that link to two different Outfalls (Outfall A and B), which discharges directly to the Willamette River.

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 oils at the Facility.

5.2 Aboveground Piping

There is no aboveground piping associated with the transfer of oils at the Facility.

5.3 Vehicular Traffic

The transformers are protected from traffic by either elevated foundations, ecology block barriers (large concrete blocks), and/or fencing.

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.

6 SECURITY

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

The Facility perimeter is fully fenced. Entry is through a manned gate, which is locked after business hours.

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

There are no aboveground valves or piping associated with the transfer of oils at the Facility.

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

There are no starter controls associated with the transfer of oils at the Facility.

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

There is a dedicated area for mobile refueling located west of Warehouse 205 (see Figure 1-2). However, this is area is operated and maintained by SSA, a tenant at the Facility.

There are no other loading and unloading connections associated with the transfer of oils at the Facility.

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

Facility lighting is maintained to reduce the potential for vandalism or operation error that may lead to releases during hours of darkness. Lighting also facilitates the detection of a leak, should one occur during hours of darkness.

7 PERSONNEL TRAINING

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

The Port's SPCC program manager is accountable for discharge prevention at the Facility. They are responsible for ensuring that SPCC-related training is completed for personnel involved in handling petroleum products. This training is included with new-employee orientation and at least annually as part of the facility environmental training program.

Near misses or incidents are discussed in order to prevent recurrence. Employee feedback and recommendations are encouraged in spill prevention and operation. If facility best management practices require modification or new best management practices are implemented, Terminal personnel receive additional training, as required.

Training will include the following topics:

- An introduction to pollution control laws
- 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
- Contents of the SPCC plan

Briefings should be held as needed with personnel involved with handling petroleum products to review the above elements and to discuss known discharges and recently developed precautionary measures.

7.2 Documentation for Training

The initial and annual SPCC training shall be documented to include the instructor's name, course outline, date of the training, attendees' names and signatures. Corrective actions identified during the training session, if any, will also be documented.

An example training log is included in Appendix C.

8 DISCHARGE PREVENTION PROCEDURES

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

Terminal personnel are trained to implement spill prevention practices for work with and around oil sources. It is expected that Terminal personnel will use common sense and rely 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 where applicable:

- Keep container lids securely fastened at all times.
- Do not leave portable sources unattended (outside).
- 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 from moving equipment.
- Do not store oil sources near catch basins or floor drains.
- Loading and unloading of petroleum products shall be attended at all times.

Any oil and fuel transfer operations at the Facility are managed by tenants and not the Port. Transformer oil at the Facility is sealed within each transformer. Transformers are not drained or refilled on a routine basis.

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

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.

Visual inspections of oil containing equipment, including secondary containment systems, are performed during routine activities at the facility. In addition, the outside of the containers is 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. Documented inspection of the oil containing equipment and secondary containment systems will be completed monthly. Written procedures for these inspections are provided on the Monthly Facility Inspection Form provided in Appendix D of this SPCC Plan. Inspection reports shall be kept for at least three years.

8.2.2 Bulk Storage Container Maintenance

Per 40 CFR Part 112.2, oil-filled electrical, operating, or manufacturing equipment is not considered bulk storage containment, and no other container at the facility qualifies as bulk storage.

8.2.3 Secondary Containment of Stormwater

Records are kept whenever stormwater is drained from secondary containment facilities. The following concerns are addressed and documented for each occurrence:

- Visually verify that rainwater is free of an oil sheen.
- Provide date, estimated volumes, and responsible personnel.
- Describe actions taken if oil is detected in stormwater.

8.2.4 Tank-Level Alarms

The Facility has no aboveground storage tanks; and therefore, has no tank-level alarms. The oil storage containers at this facility are not used for active dispensing or transferring of oil from one container to another. Spill protection in the form of drip pans and oil absorbent materials is used during maintenance of all oil-containing equipment.

8.2.5 Monitoring Leakage in Internal Heating Coils

The Facility has no internal heating coils in oil-filled tanks.

8.2.6 Maintenance of Field-Constructed, Aboveground Containers (40 CFR 112.7(i))

The Facility has no field-constructed aboveground containers.

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

In the event of a spill or release, the Port will initiate actions to minimize the impact and the possibility of recurrence of the event. These actions may include, but are not limited to, the following:

- Initial response procedures will entail controlling, containing, and recovering the spill to the fullest extent of the Port personnel's capabilities, using available spill equipment stored on facility property. At a minimum, the procedures below will be followed during the response:
  - Wear personal protective equipment such as safety glasses, gloves, and protective clothing.
  - Avoid contact with liquids or fumes.
  - Control access to the immediate spill area (including access by any customers on site).
  - Identify the source of the release and, if safe to do so, stop the release at the source.
  - Attempt to keep the release from any waterways or stormwater conveyance systems (catch basins, etc.).
  - Use the spill response equipment stored on site to control or contain the spill if possible.
  - Dispose of contaminated cleanup materials in accordance with regulations.
- If a spill exceeds facility capabilities or is determined to be an emergency spill, Environmental Spill Responders will contact Emergency Spill Contractors retained by the Port.
- A spill notification record will be completed and submitted to David Breen within 24 hours of discovery of the spill or release (see Appendix E).
- An internal review meeting will be conducted to discuss the origin of the spill or release; response and cleanup actions taken; and adverse impacts, if any, to human health and the environment, as well as to evaluate the effectiveness of this SPCC Plan. In addition, recommendations for modifying existing work practices, employee training, spill response and cleanup actions, or this SPCC Plan will be evaluated.

Based on information generated from the above actions, the Port will implement those modifications that are deemed reasonable and appropriate for minimizing the risk of a similar event. In some cases, especially where outside notification to local emergency spill response units or a regulatory agency was made or required, the Port may request that the local emergency response unit and regulatory agency

assist with evaluating the response activities and that they provide recommendations to the Port for appropriate modifications to facility operations, training, or spill plans.

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

9.1.1 On-Site Notification and Reporting

The following people are appropriate contacts in the event of a spill. The Environmental Spill Response Coordinator is responsible for communicating with appropriate regulatory agencies.

Environmental Spill Response Coordinators	**Work Phone**
Marine Security (notifies appropriate spill response personnel)	503-240-2230
Emergency Spill Response Contractors	**Work Phone**
U.S. Ecology	1-800-337-7455
Telluric Enterprises, LLC	503-505-1995
Terra Hydr, Inc.	503-625-4000

9.1.2 Notification of Regulatory Authorities

Spills must be immediately reported to David Breen or his designee as listed in the previous section 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, 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 on a Spill Notification Form (see Appendix E).

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 D) and restocked as necessary. Spill response equipment will be placed in the following locations (see Figure 1-2):

- North of dock office building
- East of dock office building
- Northeastern corner of Warehouse 203
- Western corner of Warehouse 205
- East of Warehouse 205
- Western corner of Warehouse 204
- Eastern corner of Warehouse 206
- Eastern corner of SSA Maintenance Building
- North of SSA Maintenance Building

These spill kits are equipped with the following materials:

- Absorbent pads (one bundle)
- Absorbent booms (one bale)

The 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
- Granular absorbent material (one bundle)
- Barricades, barrier tape, and/or traffic cones
- Nonsparking shovels
- Brooms
- Drain seals/plugs/mats

Wastes resulting from a spill response will be containerized, characterized for disposal, and removed from the site by a licensed waste hauler.

10 SUBSTANTIAL HARM CRITERIA CHECKLIST

Appendix F 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 4-1
Tank Spill-Prevention Features
Port of Portland - Terminal 2
3556 NW Front Avenue, Portland, OR

Tank ID	Tank Location	Tank Volume (gallons)	Contents	Tank Material of Construction	Compatible with Stored Material	Secondary Containment			Tank Spill Prevention			Loading and Unloading		
						Volume (gallons)	Materials of Construction	Covered	Leak Detection	Level Gauge	Overfill Protection	Dispenser		Transfer Pump
												Type	Drip Catcher	Lockable Controls
Transformers														
TM2-235	SSA Area	150	Transformer Oil	Steel	Yes	>150	Concrete curb	N/A	N/A (See Appendix B)			N/A		
MT2-095	SSA Area	100	Transformer Oil	Steel	Yes	>100	Asphalt with concrete curb	N/A	N/A (See Appendix B)			N/A		
MT2-085	South of Warehouse 205	268	Transformer Oil	Steel	Yes	>268	Asphalt with concrete curb	N/A	N/A (See Appendix B)			N/A		
MT2-087	West of Warehouse 203	255	Transformer Oil	Steel	Yes	>255	Concrete curb with pervious floor	N/A	N/A (See Appendix B)			N/A		
MT2-088	West of Warehouse 203	255	Transformer Oil	Steel	Yes	>255	Concrete curb with pervious floor	N/A	N/A (See Appendix B)			N/A		
MT2-089	North of low dock office building	290	Transformer Oil	Steel	Yes	>290	Concrete curb with pervious floor	N/A	N/A (See Appendix B)			N/A		
MT2-090	North of low dock office building	255	Transformer Oil	Steel	Yes	>290	Concrete curb with pervious floor	N/A	N/A (See Appendix B)			N/A		

NOTES:

< = less than.

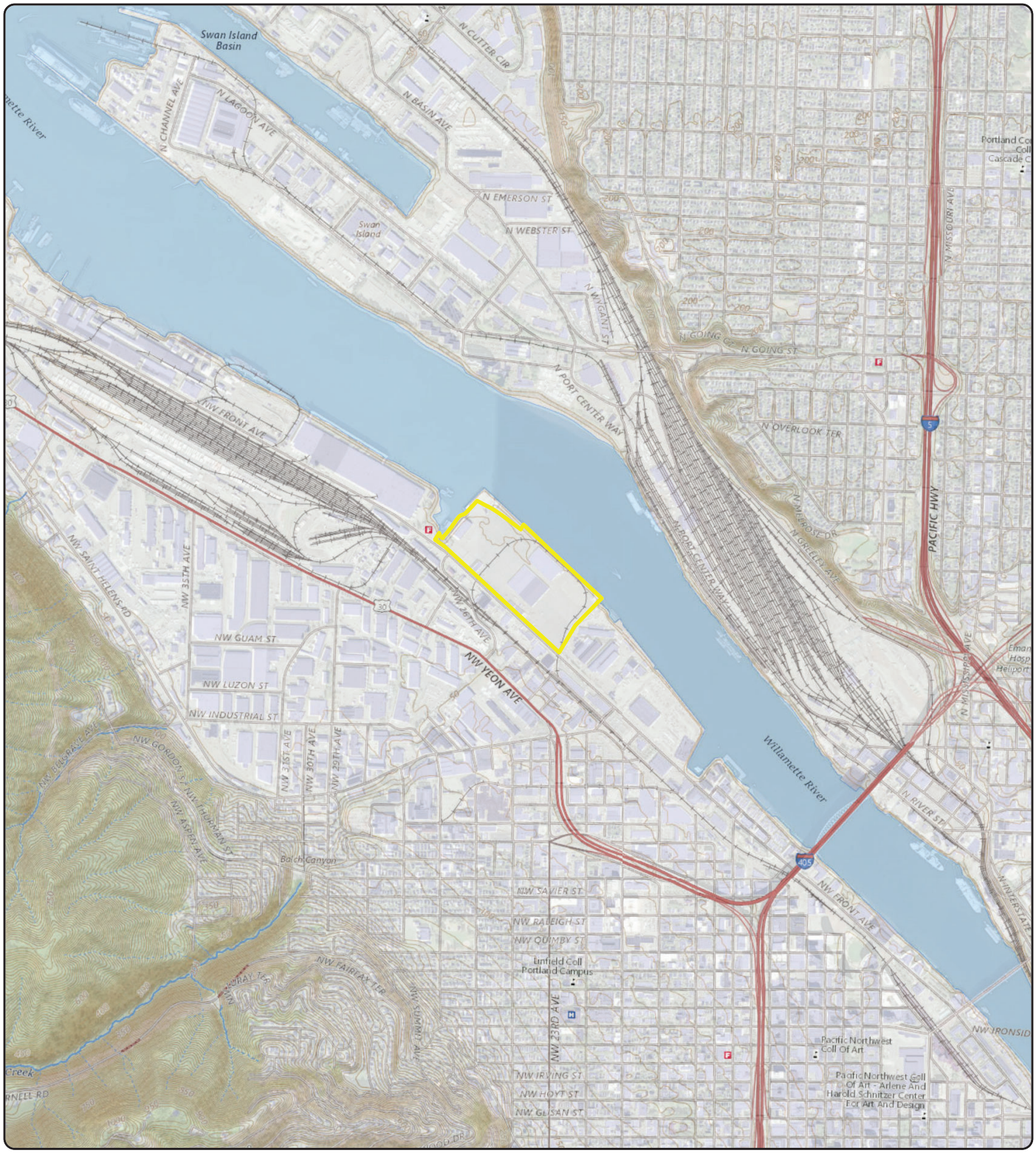
N/A = Not Applicable

> = greater than.

SPCC = Spill Prevention Control and Coutermeasure.

1. General secondary containment requirements in §112.7(c) apply to mobile refuelers at SPCC-regulated facilities.
General secondary containment should be designed to address the most likely discharge from the container and from oil transfers into or from the mobile refueler. The general secondary containment requirements:
-Do not prescribe a size for a secondary containment structure but require that the containment system prevent the spilled oil from escaping the system prior to clean up occurring.,
-Require appropriate containment and/or diversionary structures or equipment to prevent a discharge to navigable waters or adjoining shorelines.,
-Allow for the use of certain types of active containment measures that prevent a discharge to navigable waters or adjoining shorelines.

FIGURES



Notes:
U.S. Geological Survey 7.5-minute topographic quadrangle: Portland. Township 1 north, range 1 east, sections 20, 21, 28 and 29.

Data Source:
Property boundary obtained from Multnomah County.

Legend

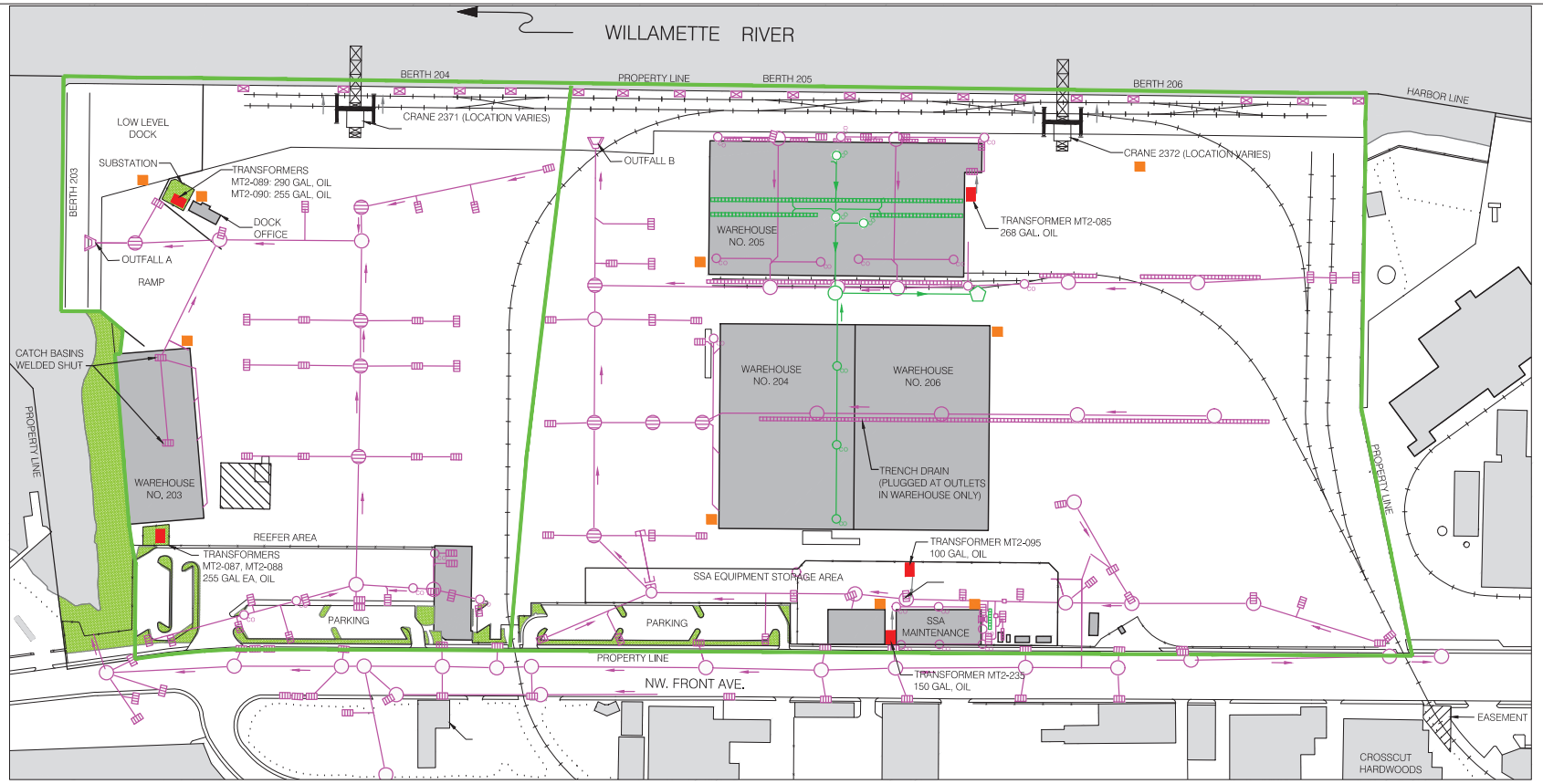
Property Boundary

Figure 1-1
Site Vicinity

Port of Portland Terminal 2
3556 NW Front Avenue
Portland, Oregon

0 1,000 2,000
Feet

MAUL FOSTER ALONGI
p. 971 544 2139 | www.maulfoster.com



LEGEND:

- DRAINAGE BASIN BOUNDARY
- SSA LEASE & PERMIT BOUNDARY
- APPROXIMATE DRAINAGE FLOW PATTERN FROM OIL-CONTAINING EQUIPMENT
- PERVIOUS AREA
- BUILDING
- DESIGNATED FUELING AREA (OPERATED BY TENANT)
- SANITARY SEWER PIPING AND FLOW DIRECTION
- SANITARY SEWER TRENCH DRAIN
- SANITARY SEWER MANHOLE
- SANITARY SEWER CLEAN OUT
- STORM SEWER CLEAN OUT
- STORM SEWER GRATED MANHOLE
- STORM SEWER MANHOLE
- STORM SEWER TRENCH DRAIN
- STORM SEWER CATCH BASIN
- STORM SEWER PIPING & FLOW DIRECTION
- STORM SEWER OUTFALL
- DOCK DRAIN
- TRANSFORMER
- SPILL KIT

0 200' 400'

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

Filepath:L:\Projects\0232.35 Port of Portland - T2\05_SPCC\External\CAD files\MFA figure\119 2009-FIGURE_02_MFA.dwg
Printed by: Loraine Daniel
Date:8/4/2022 9:58:54 AM

MFA JOB #:	0232.35.005
ISSUE DATE:	08/04/2022
CHECKED:	A. POLISKI
DRAWN:	L. DANIEL

MAUL FOSTER ALONGI
3140 NE BROADWAY STREET
PORTLAND, OR 97232
PHONE: 971.544.2139
www.maulfoster.com

TERMINAL 2

FACILITY LAYOUT MAP

PORT OF PORTLAND
3556 NW FRONT AVENUE, PORTLAND, OREGON

FIGURE
1-2

APPENDIX A

SPCC PLAN REVIEW AND AMENDMENT LOG

PORT OF PORTLAND – TERMINAL 2
SPCC PLAN REVIEW AND AMENDMENT LOG

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

Review Date	Will Amend	Reviewer Name	Reviewer Signature
	Yes / No		
	Yes / No		
	Yes / No		
	Yes / No		
	Yes / No		
	Yes / No		

Amendment Number	Description of Amendment	Date	Reviewer Name	Reviewer Signature
0	Rewrite of SPCC Plan	12/05/2022	S. Taylor	S. Taylor

APPENDIX B

OIL-FILLED EQUIPMENT CONTINGENCY PLAN

PORT OF PORTLAND – TERMINAL 2

QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT CONTINGENCY PLAN AND COMMITMENT OF MANPOWER [40 CFR 112.7(K)]

The Port owns seven oil-filled transformers located at the Terminal 2 facility. Transformers in the SSA Marine (SSA) Equipment Storage Area as well as the transformer located south of Warehouse 205 have a concrete curb with secondary containment. The remaining transformers are surrounded by a concrete curb but have a pervious floor.

As a conservative measure, this oil spill contingency plan has been prepared for the transformers at the Facility.

The Port has not had either of the following within the three years prior to the SPCC Plan certification date:

- A single reportable discharge from either transformer exceeding 1,000 gallons.
- Two reportable discharges from either transformer exceeding 42 gallons within any 12-month period.

1.1 Implementation Criteria

This Oil Spill Contingency Plan describes measures addressing the requirements of 40 CFR Part 109 and a commitment to control and remove harmful quantities of oil that may be discharged. The inclusion of the Oil Spill Contingency Plan and commitment of manpower meets the requirements outlined for Alternative Requirements to General Secondary Containment as defined in 40 CFR 112.7(k) and the alternative for impracticability determination for the seven oil-filled transformers as defined in 40 CFR 112.7(d).

Criteria for state, local, and regional oil removal contingency plans are listed in 40 CFR 109. The following is a cross-reference of the requirements found in 40 CFR 109 and the corresponding sections of this SPCC Plan.

Regulatory Citation	Summary of Regulation and Cross-reference in SPCC Plan
40 CFR 109.5(a)	Authorities, responsibilities, and duties of parties involved in oil removal operations are included in Section 9 of this report. Methods of disposal are included in Section 9.2. A contact list is included in Section 9.1.1.
40 CFR 109.5(b)	Notification procedures are included in Section 9.1 and Appendix F of this report. Critical water use areas, if applicable, are identified in Section 1.3.
40 CFR 109.5(c)	Resource capabilities are addressed in Sections 4 and 9.2. Spill control and clean-up equipment is located at various locations (see Figure 1-2).
40 CFR 109.5(d)	Actions taken after discovery and notification of an oil discharge are included in Section 9 and Appendix F.
40 CFR 109.5(e)	Procedures for facilitating the recovery of damages and enforcement measures are located in Section 9.

1.2 Written Commitment of Manpower, Equipment, and Materials

The commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful has been attested by the Director of Commercial Properties, whose dated signature is found on the inside cover page (page II) of this SPCC Plan.

APPENDIX C

SPCC EMPLOYEE TRAINING LOG

PORT OF PORTLAND – TERMINAL 2
PORTLAND, OREGON

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 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

INSPECTION AND MAINTENANCE FORMS

FORM 1

MONTHLY FACILITY INSPECTION FORM
Port of Portland
Terminal 2 Facility

Inspected by: _____ **Signature:** _____ **Date:** _____ **Time:**_____

Location	Container #	Contents	Capacity (gallons)	Condition OK = Acceptable X= Not Acceptable NA = Not Applicable			Comments
				Container	Valves & Appurtenances	Secondary Containment	
Oil Containing Equipment							
SSA Area	TM2-235	Transformer oil	150				
	MT2-095	Transformer oil	100				
East of Warehouse 205	MT2-085	Transformer oil	268				
Southwest of Warehouse 203	MT2-087	Transformer oil	255				
	MT2-088	Transformer oil	255				
North of low dock office building	MT2-089	Transformer oil	290				
	MT2-090	Transformer oil	255				

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

Check for:
- Any stains on the outside of the transformers
- Any oil on the ground on the outside of the transformers?
- Any visible deformities on the transformers?
- Properly labeled for PCBs?

Check any piping, valves and appurtenances 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
- Fences secured

Spill Kits

Tamper Seal	Lid Secure	Absorbents Replaced?	PPE Replaced?	Comments
#1				
#2				
#3				
#4				
#5				
#6				
#7				
#8				
#9				

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

Completed forms are to be kept in the Master Copy of this SPCC Plan.

Additional Comments:

_____

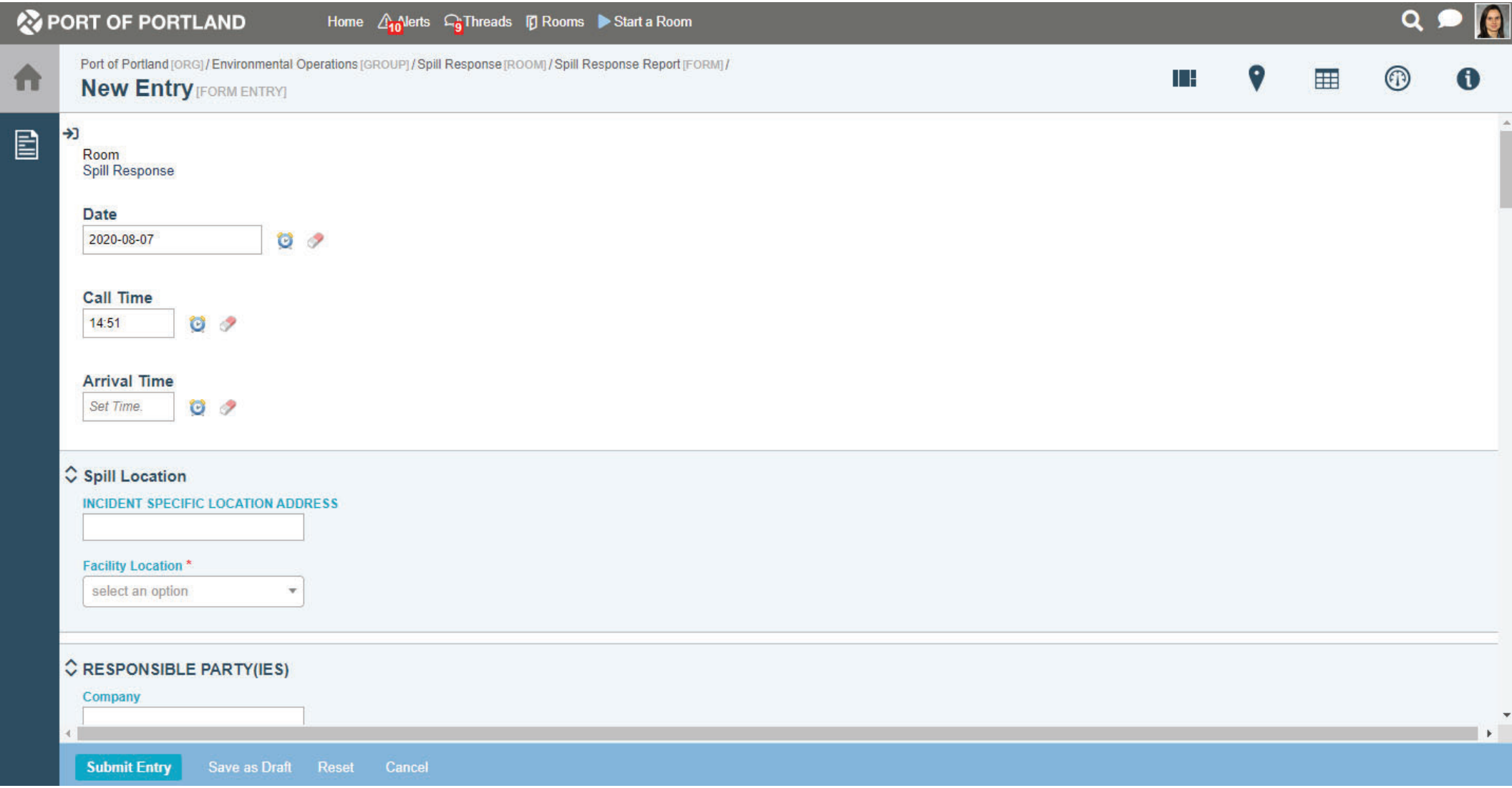
_____

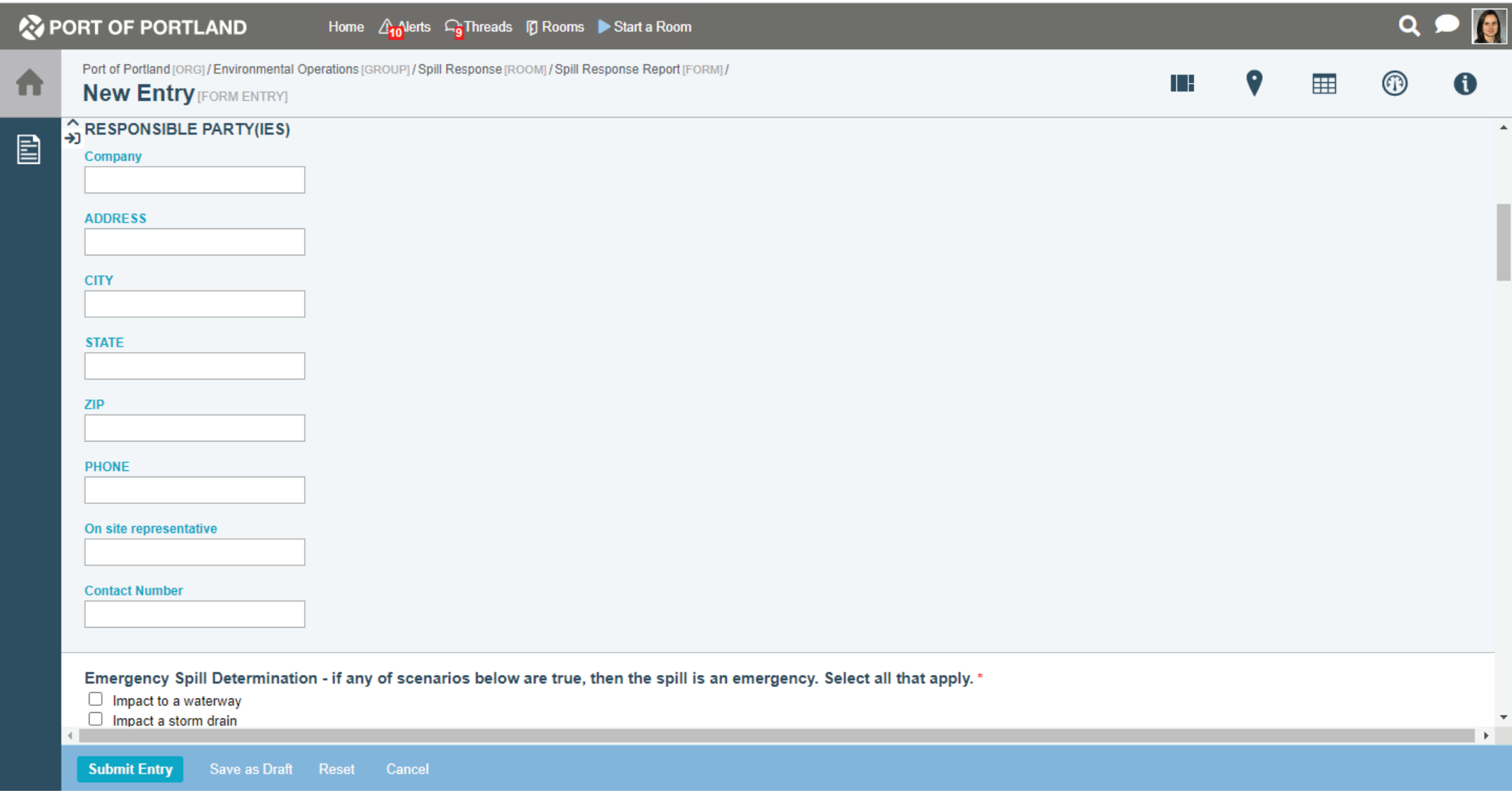
_____

_____

APPENDIX E

SPILL RESPONSE AND NOTIFICATION FORMS


PORT OF PORTLAND
Home
Alerts 10
Threads 9
Rooms
Start a Room
Port of Portland [ORG] / Environmental Operations [GROUP] / Spill Response [ROOM] / Spill Response Report [FORM] /
New Entry [FORM ENTRY]
Room
Spill Response
Date
2020-08-07
Call Time
14:51
Arrival Time
Set Time.
Spill Location
INCIDENT SPECIFIC LOCATION ADDRESS
Facility Location *
select an option
RESPONSIBLE PARTY(IES)
Company
Submit Entry
Save as Draft
Reset
Cancel


PORT OF PORTLAND
Home
Alerts
10
Threads
9
Rooms
Start a Room
Port of Portland [ORG] / Environmental Operations [GROUP] / Spill Response [ROOM] / Spill Response Report [FORM] /
New Entry [FORM ENTRY]
RESPONSIBLE PARTY(IES)
Company
ADDRESS
CITY
STATE
ZIP
PHONE
On site representative
Contact Number
Emergency Spill Determination - if any of scenarios below are true, then the spill is an emergency. Select all that apply. *
Impact to a waterway
Impact a storm drain
Submit Entry
Save as Draft
Reset
Cancel

Emergency Spill Determination - if any of scenarios below are true, then the spill is an emergency. Select all that apply. *

- [ ] Impact to a waterway
- [ ] Impact a storm drain
- [ ] Fugitive spill (sheen from an unknown source)
- [ ] The spill larger than 50 sqft?
- [ ] The spill has impacted operations
- [ ] The spill petroleum or oil and larger than 42 gallons?
- [ ] The spilled or leaking substance is unknown
- [ ] The spill is a hazardous substance (toxic / corrosive / flammable / reactive)?
- [ ] None of the above; non-emergency spill.

Select All

HAZARDOUS SUBSTANCE

Material Involved

- [ ] Fuel
- [ ] Oil
- [ ] Sewage
- [ ] Deicing Fluid
- [ ] Other

Select All

Cause of Incident

- [ ] Abandoned
- [ ] During Delivery/Ship
- [ ] During Handling
- [ ] During Repair
- [ ] Excavation
- [ ] Fire Explosion
- [ ] Fueling Operation
- [ ] Leaking Equipment
- [ ] Hydraulic Line Break/Leak

Select All

Cause of Incident

- [ ] Abandoned
- [ ] During Delivery/Ship
- [ ] During Handling
- [ ] During Repair
- [ ] Excavation
- [ ] Fire Explosion
- [ ] Fueling Operation
- [ ] Leaking Equipment
- [ ] Hydraulic Line Break/Leak
- [ ] Storage
- [ ] Vehicle Accident
- [ ] Unauthorized Release
- [ ] Unknown
- [ ] Other

Select All

Estimated Quantity

RESPONDERS

Responders

- [ ] Maintenance
- [ ] Ops
- [ ] Environmental Operations
- [ ] FIRE
- [ ] Police
- [ ] Responsible Party
- [ ] Environmental Contractor
- [ ] Long Shore (ILWU)

RESPONDERS

Responders

- [ ] Maintenance
- [ ] Ops
- [ ] Environmental Operations
- [ ] FIRE
- [ ] Police
- [ ] Responsible Party
- [ ] Environmental Contractor
- [ ] Long Shore (ILWU)
- [ ] Navigation Staff
- [ ] Harbor

Select All

ENVIRONMENTAL CONTRACTOR

- [ ] TERRA HYDR INC
- [ ] NRC INC
- [ ] CLEAN HARBORS
- [ ] OTHER

Select All

OTHER (SPECIFY)

NOTIFICATIONS

Notifications -

- [ ] NRC (1-800-424-8802)
- [ ] OERS (1-800-452-0311)
- [ ] Safety
- [ ] Properties

NOTIFICATIONS

Notifications -

- [ ] NRC (1-800-424-8802)
- [ ] OERS (1-800-452-0311)
- [ ] Safety
- [ ] Properties
- [ ] Legal
- [ ] EPA
- [ ] DEQ
- [ ] Deicing System Operator
- [ ] Risk
- [ ] Public Affairs
- [ ] OTHER
- [ ] NONE
- [ ] Terminal Manager
- [ ] BES (503-823-7180)
- [ ] CWS (503-681-3600)
- [ ] Navigation Base Manager
- [ ] Coast Guard (503-240-9370)

Select All

NRC REPORT NUMBER

OERS REPORT NUMBER

Notification Date

Set Date.

Notification Time

Notification Time

Set Time.

EVENT OCCURRENCE

HOW DID THE SPILL OCCUR

RELEASE TO STORM SYSTEM?

select an option

CONTAINED IN STORM SYSTEM?

select an option

DRAINAGE BASIN & OUTFALL NUMBER?

ACTIONS TAKEN TO CLEAN UP SPILL

COMMENTS

Photos

Photo

+ Choose a File

PERSON MAKING REPORT

Type name or email...

Danelle Peterson

Signature

Done Signing

Status

Status

In Progress

PORT OF PORTLAND
T2 SPILL RESPONSE PROCEDURES

IF A SAFETY HAZARD EXISTS CALL THE FIRE DEPARTMENT FIRST (DIAL 911)

#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: Marine Security	Notifies appropriate Environmental Spill Response personnel	Marine Security 503-240-2230

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

SUBSTANTIAL HARM CRITERIA CHECKLIST (40 CFR 112.20(E))

A "yes" to any of the checklist criteria requires submittal of a Facility Response Plan, per 40 CFR 112.20.

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

FACILITY NAME: Port of Portland – Terminal 2

FACILITY ADDRESS: 3556 NW Front Avenue

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.

David J. Breen	David J Breen
Name (please type or print)	Signature
Sr. Manager, Environmental Mixed Media	January 6, 2024
Title	Date