SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

PORT OF PORTLAND MARINE TERMINAL 6 7201 NORTH MARINE DRIVE PORTLAND, OREGON

Prepared for **PORT OF PORTLAND**

January 4, 2023 Project No. M0232.26.005

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MANAGEMENT APPROVAL

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

Date:

Signature: _____ Fred Myer

Title: Terminal 6 & Waterways Manager

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 Terminal 6 facility at 7201 North Marine Drive in Portland, Oregon ("Facility"); that this Spill Prevention Control and Countermeasures Plan (SPCC 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 SPCC Plan is adequate for the Facility.



Steven P. Taylor, PE Principal Engineer

Date: January 4, 2023

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- 4-1 TERMINAL 6 TANKS
- 4-2 TERMINAL 6 WET TRANSFORMER INVENTORY

FIGURES 1-4

| AST | aboveground storage tank |
|----------|--|
| CFR | Code of Federal Regulations |
| facility | 7201 North Marine Drive, Portland, Oregon |
| OERS | Oregon Emergency Response System |
| OWS | oil/water separator |
| SPCC | spill prevention control and countermeasures |
| USEPA | U.S. Environmental Protection Agency |

This Spill Prevention Control and Countermeasures Plan (SPCC Plan) has been prepared for Marine Terminal 6, operated by the Port of Portland (the Port) located at 7201 North Marine Drive, Portland, Oregon ("the facility").

1.1 Location

The facility is approximately 220 acres consisting of several 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 railroad tracks and North Marine drive, to the north by a large parking area and commercial and industrial properties, to the east by the Columbia River, and to the south by several commercial and industrial properties.

1.2 Site Facilities and Current Operations

The facility is currently a cargo and container transfer facility with associated equipment maintenance and fueling activities. The site consists of administrative offices, storage and container yard area, and electrical shop associated with equipment maintenance (see Figures 1 through 4; provided by the Port).

The facility is designed to allow materials to be brought on site and shipped off site by truck, rail, and ship. During operations, product may be transferred and loaded by reach stackers, top loaders, or top picks.

Equipment, containers, oil storage containers, and some spare parts are stored outside on the site.

Support facilities include the administration building and the crane, transtainer, and top loader maintenance shops. The CDC building at Terminal 6 houses the gearlocker shop for maintenance of industrial equipment, heavy vehicles, and light trucks. The building also contains several equipment storage areas, indicated on Figure 3.

A vehicle fueling station is located west of the CDC building (Figure 3).

1.3 Waterways and Site Drainage

The facility encompasses portions of seven drainage areas (Basins H, I, J, K, L, M, and O). Drainage basins, I and J completely infiltrate through sand and gravel, there is no storm system in these drainage areas, and therefore, no discharge. Drainage basins K and L are pumped to an infiltration

basin. Drainage basins O and H discharge to the Columbia River. Drainage basin M discharges to the Columbia Slough

An equipment wash area southeast of the administration building drains to the sanitary sewer.

Stormwater in the vicinity of the fueling station tanks flows south to catch basins that eventually discharge to the Columbia Slough. There is a catch basin set in the concrete pad of the fuel station dispenser area (adjacent to the southeast of the tanks) that drains to an oil/water separator, which is equipped with a valve that can be closed in the event of a spill. Another catch basin located adjacent to the southwest of the dispensers and tanks is also equipped with a closable valve. Both the oil/water separator and this second catch basin discharge to the City of Portland sanitary sewer. Closing either valve would block the direct flow to the sanitary sewer from that location. The oil/water separator would capture approximately 200 gallons of oil.

Drainage features and discharge structures at the facility are shown on Figures 1 through 4.

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 the requirements of 40 CFR Part 112. The purpose of the 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-transportationrelated onshore facilities engaged in storing, transferring, or consuming oil and oil products, and which, because of their location, could reasonably be expected to discharge oil in harmful quantities into or upon navigable waters, and which 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 Terminal 6 site 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 or 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 to periodic training programs for employees
- As a guide to facility inspections
- As a resource during an emergency response

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

This SPCC Plan is specifically written to cover operations at Terminal 6. The facility description and operations related to the SPCC Plan requirements are discussed in Section 4. Implementation of this SPCC Plan will be the responsibility of the Port.

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 are addressed in the sections of this plan, as described 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(V), 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) | 112.7(a)(2) Equivalent environmental protection | | |
| 112.7 | Full approval of management | Certification (III) | |
| 112.7(a)(3) | Describe physical layout with diagrams | 1.2 & 1.3, Figures 1 through 4 | |
| 112.7(a)(3)(i) | Type of oil in each container and product volume stored in each | Tables 4-1 and 4-2, Figures 1 through 4 | |

| Citation | Subject | SPCC Plan Section |
|------------------|---|---------------------|
| 112.7(a)(3)(ii) | Discharge prevention measures (including loading, unloading, and transfers) | 5 & 8.1, Appendix C |
| 112.7(a)(3)(iii) | Discharge controls and secondary containment | 4 & 8.2.3 |
| 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, Appendix F |
| 112.7(b) | Prediction of spill rate, direction, volume for each major type of failure | 4 |
| 112.7(c) | Description of secondary containment | 8.2.3 |
| 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 E |
| 112.7(f)(2) | Designate person accountable | 7.1 |
| 112.7(g)(1) | Security—fencing | 6.1 |
| 112.7(g)(2) | Valves and drains | 6.2 |
| 112.7(g)(3) | Starter controls | 6.3 |
| 112.7(g)(4) | Loading connections | 6.4 |
| 112.7(g)(5) | 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 | Not applicable |
| 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 | Appendix C |
| | (2) Sufficient secondary containment and sufficiently impervious | 8.2.3 |
| | (3) Drainage | 8.2.3, Appendix C |
| | (4) Corrosion control / (5) partially buried | Not applicable |
| | (6) Tank integrity | 8.2.1 |
| | (7) Heating coils | 8.2.5 |
| | (8) Tank level alarms | 8.2.4 |
| 112.8(c)(9) | Observe wastewater treatment plant's effluent 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 |
| 112.8(d) | Facility transfers, including buried piping | 5 |

2.5 Environmental Equivalence

The facility's 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 (STI) Standard for the Inspection of Aboveground Storage Tanks (SP001 4th edition).

2.6 Impracticability

The Port can meet the general and specific secondary containment requirements of 40 CFR 112 through active and passive secondary containment measures. Site drainage through oil/water separators and/or vaults equipped with shutoff valves provides a redundant layer of protection.

Spill control measures outlined in the Spill Prevention and Response Procedures section of the Stormwater Pollution Control Plan (Appendix A) would be implemented in the event of a discharge exceeding the capacity of these secondary containment measures. The Port has committed the necessary personnel, equipment, and materials to address spill events that occur outside of secondary containment in accordance with the management approval signature on the Certification page of this SPCC Plan.

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 plan.

2.8 Qualified Oil-Filled Equipment

The alternative requirements for qualified oil-filled operating equipment are not implemented at Terminal 6.

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 occur.

Additionally, a professional engineer will complete a review and evaluation of the SPCC Plan at least once every five years. As a result of this review and evaluation, the 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, results in the need for SPCC Plan technical amendments, the SPCC Plan will be recertified by a professional engineer, consistent with 40 CFR Part 112.3(d) and 112.5(b) and (c).

Each review or amendment to the SPCC Plan will be documented in the review and amendment log in Appendix B. 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 the SPCC Plan must be submitted to the U.S. Environmental Protection Agency (USEPA) regional administrator whenever the facility discharges more than 1,000 gallons in a single event, or discharges more than 42 gallons of oil in each of two spill events within a 12-month period.

Such facility information would include, at a minimum:

- Name and address of 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 Section 112.4(a) applicable to the facility, including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Any other information pertinent to the SPCC Plan or discharge that the regional administrator may reasonably require.

4 POTENTIAL SPILL SOURCES AND SPCC FEATURES

Petroleum products are stored and/or dispensed at the following locations. Tank numbers refer to the identifiers on Figures 1 through 4 and in Table 4-1.

4.1 CDC Oil Storage Room

The facility stores oil in tanks and drums inside a room at the northern corner of the gearlocker. These containers feed overhead dispensers located in the gearlocker maintenance shop. There are three steel tanks sitting on a grated concrete vault with no drain. A fourth tank, containing hydraulic oil is located within secondary containment. An 800-gallon diesel emergency water pump is stored next to the waste staging area. The tank is double walled.

Up to fifteen 55-gallon drums are stored on the concrete floor. Three walls of this room are also concrete; the fourth wall, which is adjacent to a loading bay door, has a roll-up vehicle door and a man-door.

The containment capacity of the grated vault is approximately 450 gallons, which is greater than the capacity of the largest container in the group.

The floor of the oil storage room is sloped towards the northwest wall of the building, which provides adequate secondary containment for the 55-gallon drums and potential releases from the piping in the room.

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

Spills in the oil storage room could be related to tank or drum rupture or overfill or to line, valve, or pump failure.

A spill could occur during delivery or transfer operations, most likely due to hose or valve failure and/or lack of driver attention. In each case, the primary spill countermeasure is strict driver attention to standard delivery procedures.

Product spilled at the oil storage room that could potentially be released from containment and/or the building would likely flow north and west towards the on-site stormwater system that eventually discharges to the Columbia Slough. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 800 gallons. Active secondary containment measures would be used to respond to this type of release.

4.2 CDC Fueling Area

Facility vehicles are filled from a 12,000-gallon diesel fuel and 4,000-gallon gasoline tank via a dispensing station located west of the CDC building. The tanks are equipped with integral secondary containment.

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

Probable causes for spills at the fueling area originate from valve, meter, or hose failure and/or overfilling a tank or vehicle. Less likely is a release from the puncture or collapse of a tank. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 12,000 gallons.

If there is an accidental product release, operator attention and rapid response should be sufficient to hold a spilled quantity to a minimum.

Stormwater in the general vicinity of the fueling station tanks flows south to catch basins that eventually discharge to the Columbia Slough.

There is a catch basin set in the concrete pad of the fuel station dispenser area (adjacent to the southeast of the tanks) that drains to an oil/water separator, which is equipped with a valve that can

be closed in the event of a spill. Another catch basin located adjacent to the southwest of the dispensers and tanks is also equipped with a closable valve. Both the oil/water separator and this second catch basin discharge to the City of Portland sanitary sewer. Closing either valve would block the direct flow to the sanitary sewer from that location. The oil/water separator would capture approximately 200 gallons of oil.

4.3 Used-Oil Tank

Used oil is stored in a 1,150-gallon, double-walled tank located west of the CDC building. Oil drains from a sink inside the CDC building through a metal pipe or is pumped through a flexible hose that is threaded through a hole in the wall, into the tank.

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

Spills may originate from hose or valve failure and/or lack of operator attention. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 1,150 gallons.

Product spilled on the pavement during transfer or released from secondary containment would likely be captured behind the concrete barriers that protect the tank. Released material that escaped this barrier would flow west towards the on-site stormwater system that eventually discharges to the Columbia Slough. Active secondary containment measures would be used to respond to this type of release.

In case of a catastrophic spill that reaches the catch basin at the fuel dispensers or the catch basin located southwest of the fuel tanks, the respective gate valve would be closed, interrupting direct flow to the sanitary sewer.

4.4 Transtainer Building

Product motor oil, hydraulic oil, and used oil are stored in double-walled containers outside the northwest wall of the transtainer building. Contents of the tanks feed wall-mounted dispensers located in the transtainer maintenance shop via fixed metal piping. Two double-walled tanks are located in a metal shed with a 1-inch-deep metal pan, two double-walled tanks are within a metal shed with a 1-foot concrete berm, one double-walled tank is within a concrete berm, and one double-walled tank is located behind a concrete barrier that provides protection from vehicular traffic.

Up to three 55-gallon drums are stored within these sheds on containment pallets or a rolling containment dolly.

Up to five 55-gallon lubricant drums are stored on spill control pallets inside the transtainer maintenance shop.

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

Spills may originate from hose or valve failure, lack of operator attention, and/or during tank filling. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 1,000 gallons.

Four of these tanks have not only secondary, but essentially tertiary containment. In the extremely unlikely event that material escapes containment, it could flow west to stormwater catch basins, which would eventually discharge to the Columbia River.

The floor of the transtainer maintenance shop is sloped towards the northwest wall, which would capture the volume of a likely release from the dispensers or drums.

4.5 Crane Maintenance Shop

Up to ten 55-gallon drums are stored within these sheds on containment pallets inside the crane maintenance shop.

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

Spills in the crane maintenance shop could occur from a drum rupture.

Product spilled in the crane maintenance shop could potentially be released from containment and/or the building would likely flow north and west towards the on-site stormwater system that eventually discharges to the Columbia Slough. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 200 gallons. Active secondary containment measures would be used to respond to this type of release.

4.6 Transformers

There are 42 wet electrical transformers at the Terminal 6 site, as listed in Table 4-2.

Each of these electrical transformers contains oil used for cooling and electrical insulation. The oil is sealed within each transformer and is not drained or added to the transformer on a routine basis. The location of each oil-cooled transformer is shown on Figures 1 through 4.

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

Due to the risk of electrical equipment coming in contact with water, none of transformers are equipped with secondary containment. To minimize the risk of a catastrophic failure leading to a release of oil, the circuitry is protected by circuit breakers and fuses, which help protect the transformer by reacting to interrupt power.

A spill could possibly occur if a transformer malfunctioned and exploded. If this occurs, Terminal 6 personnel will respond by blocking off the nearest catch basin(s) to prevent oil from entering the stormwater system.

In the event of overpressurization and blowout, a small amount of oil would be released to the atmosphere and surrounding gravel. Terminal 6 personnel would immediately initiate measures to identify and clean up any potential oil contamination, make repairs to the transformer, and fulfill notification requirements contained in Section 9.

Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 425 gallons. Discharges would likely be limited to the general vicinities. Active secondary containment procedures (e.g., deployment of spill response equipment from spill kits and/or the spill response trailer) and the spill control measures outlined in the Spill Prevention and Response Procedures section of the Stormwater Pollution Control Plan (Appendix A) would be implemented in the event of a larger discharge.

4.7 Fuel truck

A 2,200-gallon, double-walled fuel truck is parked outside the CDC building at the vehicle fueling station. The fuel truck is currently unused.

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

The most likely spills would originate from hose or valve failure and/or lack of operator attention during filling or dispensing. Less likely would be a catastrophic release due to puncture or failure of the tank(s). Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 2,200 gallons. Product spilled in the building would likely remain inside. Spills to the pavement would be addressed with active secondary containment measures. The truck is equipped with spill response equipment adequate to respond to a typical spill, meeting the general secondary containment requirements for mobile refuelers. For larger spills, measures outlined in the Spill Prevention and Response Procedures section of the Stormwater Pollution Control Plan (Appendix A) would be implemented.

4.8 Mobile Generators

A mobile generator with a 1,200-gallon tank is typically stationed west of the CDC building. A spill trailer stocked with adequate secondary containment equipment for this tank is located in proximity to the generators, just inside the nearby CDC building.

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

Spills may originate from hose or valve failure and/or lack of operator attention. Releases could be slow or rapid, with a worst-case scenario of nearly instantaneous loss of 1,200 gallons. Product spilled on the pavement during transfer or released from secondary containment would likely be captured using active secondary measures. Available spill response supplies are adequate to collect the most likely potential release during transfer activities.

4.9 Fenced Drum Storage

Empty plastic overpack drums are stored in a fenced, covered, bermed area, with a blind sump. These drums are used to collect material generated during spill events on the terminal. Material deposited in the overpack drums from such spill incidents is also temporarily staged in the area, before shipment to an appropriate disposal site.

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

A spill could possibly occur during transfer operations or from puncture of a container. A significant spill is unlikely from these drums, which generally contain oil-contaminated absorbent material. Truck drivers and employees performing transfer operations would have adequate opportunity to notice product releases and to take appropriate actions.

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 underground piping associated with the transfer of fuel to the fueling dispensers. The piping was installed before 2002. If a section of buried line is exposed, it will be carefully inspected for deterioration. If corrosion damage is discovered, additional examination and appropriate corrective action will be undertaken. If the piping is repaired or replaced, it will be provided with a protective wrapping and coating.

5.2 Aboveground Piping

Aboveground piping carries oils from the CDC oil storage room to the overhead dispenser, from the sink in the CDC to the used-oil tank outside the building, and from the tanks and drums inside and outside the transtainer building to the wall-mounted dispensers inside the building. Pipe supports have been designed to minimize abrasion and corrosion and to allow for expansion and contraction. This piping is inspected as part of the monthly inspection protocol.

Releases from piping inside the CDC building would likely remain within the building.

A release from the short run of piping from the CDC building to the used-oil tank would likely be small (less than 5 gallons) and would largely be contained behind the concrete barrier.

The most likely potential releases from the piping at the transtainer building would be contained within the building and within the secondary containment for the tanks. Potential releases from the

very short runs of piping outside the building and secondary containment would largely be contained between the building and the tanks or their secondary containment.

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

5.3 Vehicular Traffic

The storage tanks are protected from vehicles by the secondary containment walls, concrete blocks or walls and building walls.

5.4 Tank Truck Containment and Warning

The USEPA'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 USEPA clarified that the provisions of §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 Port has a comprehensive set of procedures covering the pickup and delivery of bulk chemicals to minimize the potential for accidental spills. A copy of these procedures is included in Appendix C.



6.1 Fencing (40 CFR, Part 112.7(g)(1))

The east, south, and west perimeter of the facility is completely surrounded by a chain-link fence and access is strictly controlled by personnel at the guardhouse. The docks on the north boundary of the Terminal are closely monitored by Port and contractor personnel.

6.2 Aboveground Valves and Piping (40 CFR 112.7(g)(2))

Aboveground valves and piping are inspected monthly for signs of leaks or damage to the pipes, supports, and dispensers. These inspections are documented on an SPCC inspection form (see Appendix D). All tank flow valves and drain valves that could permit direct outward flow of a tank's contents to the surface are securely locked in the closed position when in nonoperating status.

6.3 Starter Controls (40 CFR, Part 112.7(g)(3))

Starter controls for oil pumps are located in a secure area or locked in the "off" position when not in use.

6.4 Loading and Unloading Connections (40 CFR, Part 112.7(g)(4))

The operation of piping connections used for filling and evacuating oil tanks is limited to personnel familiar with them and with the procedures discussed in Appendix C. When not in use, piping connections are capped and/or locked out. These connections are inspected before use for the general condition of joints, supports, valves, and metal surfaces.

6.5 Facility Lighting (40 CFR, Part 112.7(g)(5))

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 Terminal 6. He is 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 to prevent recurrence. Employee feedback and recommendations are encouraged in spill prevention and operation. If the facility's 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.

7.1.1 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 E.

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:

- 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.
- 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 the OWS. 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.

The Port works closely with suppliers to ensure that they meet the minimum requirements and regulations for tank truck unloading as established by the U.S. Department of Transportation, and that they understand the site layout, know the protocols for entering the site and unloading product, and have the necessary spill equipment on board to respond to a spill from the vehicle or fuel delivery hose.

The facility manager or designee will supervise deliveries for all new suppliers and will periodically observe deliveries from approved suppliers. Deliveries will follow the Terminal 6 material handling procedures included in Appendix C.

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

Tank integrity is evaluated in a program based on STI Method SP001. Tanks within secondary containment (a release prevention barrier) that allow a release to be detected using "passive" methods (without use of sensors or power) are considered to have a Continuous Release Detection Mechanism and are inspected according to the following schedule:

| Gallons | Tanks | Inspection Schedule | | |
|---|--|---|---|--|
| 5,001- 50,000 | T6-AST-5 | Monthly and annual inspections by site owner / operator | External Inspections by a certified inspector every 20 years or as indicated by inspection results.* | |
| 5,000 or less | T6-AST-1 through T6-AST-4 and T6-AST-6 through T6-AST-12 | Monthly and annual inspections by Port | | |
| | Oil –filled operating tanks | Monthly inspections by Port | | |
| | Portable drums and totes | Monthly inspections by Port | | |
| *Internal inspection may be recommended by the certified inspector based on finding from the external inspection. | | | | |

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.

Inspection reports shall be kept for at least three years.

8.2.2 Bulk Storage Container Maintenance

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

Storage container and piping problems are to be reported immediately to Marine Security. Visible oil spills (leaks) that cause a loss of oil from containers, piping, or other components shall be repaired or the equipment replaced as soon as practical to prevent the potential for a major spill from the source. This is especially important for sources outside or near drains or catch basins that discharge to the environment.

8.2.3 Secondary Containment of Stormwater

Much of the site is paved. All bulk storage tanks are equipped with integral secondary containment or are located inside covered containment structures adequate to contain the entire contents of the largest tank (see Table 4-1). Secondary containment for storage tanks at Terminal 6 does not collect rainwater.

Secondary containment drains, if present, are manually operated, kept closed, and the contents inspected before discharge. Oily liquids that might collect in containment will be removed and disposed of by a qualified and licensed waste contractor.

A secondary containment area for leaking cargo containers is located in the hazardous cargo storage area identified on Figure 3. The containment area is located in Basin L and is comprised of three zones, each equipped with an emergency shut-off gate isolating that portion of the storm drain system. The zones and shut-off gates are clearly marked with yellow paint to identify which gate to use in case of an emergency or spill. All catch basins in this area are also clearly marked to indicate to which sluice gate they direct flow. Once cargo has been placed in containment, valves are closed, and Marine Security is notified. This containment can give facility personnel additional time to determine the appropriate action and action level, while isolating leaking cargo. Once the valve is closed, only Port Environmental has authority to open the valve.

8.2.4 Tank-Level Alarms

There are tank-level gauges on each tank.

Tank filling activities are observed from start to finish by delivery and/or Terminal 6 personnel.

8.2.5 Monitoring Leakage in Internal Heating Coils

There are no internal heating coils in the tanks.

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

There are no field-constructed, aboveground containers on site.

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's personnel's capabilities, using available spill equipment stored on facility property. Determine if the spill qualifies as an emergency or non-emergency spill and follow appropriate procedures (Appendix A).
- At a minimum, the following procedures will be used during the response:
 - Wear personal protective equipment such as safety glasses, gloves, and protective clothing.
 - Avoid contact with liquids or fumes.
 - Control and limit 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, Marine Security will contact Emergency Spill Contractors retained by the Port.
- A spill notification record will be completed and submitted to Port Environmental within 24 hours of discovery of the spill or release (see Appendix F).

• An internal review meeting will be conducted to discuss the origin of the spill or release; response and cleanup actions taken; adverse impacts, if any, to human health and the environment; and an evaluation of the effectiveness of this SPCC Plan. In addition, recommendations to modify 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 site 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 emergency coordinator is responsible for communicating with appropriate regulatory agencies.

| Emergency Coordinators | Work Phone |
|--|----------------|
| Marine Security (notifies appropriate spill response | 503-240-2230 |
| personnel) | |
| 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 |

Marine Security (503-240-2022) will be notified immediately in the event of a spill. Marine Security will then notify PDX Communication Center (503-460-4000) who will notify Port Environmental Spill Response Coordinators.

9.1.2 Notification of Regulatory Authorities

Spills must be immediately reported to Marine Security who will then notify the Portland Airport (PDX) Communications Center to dispatch Port Environmental Spill Response Coordinators. Environmental Spill Response Coordinators will notify authorities (if necessary). Regulators will be informed following the guidelines described 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 greater 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** by calling **1-800-452-0311**.
- Any time there is a danger to life, health, or the environment, contact the local public emergency services at 911.
- Spills of any amounts 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 (i.e., no floor drains).

Notations of the time, date, and details of any emergency incident will be documented on a Spill Notification Form (see Appendix F).

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 at the locations shown on Figures 1 through 4. Each spill kit includes absorbent pads and booms. The spill kit at the fueling island also includes a drain cover.

These spill kits are well marked and contain absorbent booms and/or pads.

The kits may include these additional items as needed:

- Granular absorbent material
- Drum or other container to hold contents of spill kit
- Bags and ties, or other containers to hold contaminated materials
- Drain seals/plugs/mats

The spill response trailer is generally equipped with the following:

- Six traffic cones
- Three empty waste barrels
- Five cases of absorbent pads
- Eight sacks of peat-moss-based absorbent
- Four brooms
- Four shovels
- Two cases of boom socks

- Two drain covers
- Six pairs of rubber gloves and disposable Tyvek overalls

Wastes resulting from a spill response will be containerized, characterized for disposal, and removed from the site by a licensed waste hauler. Note that in addition to the permanent on-site spill kits, many vehicles are also equipped with mobile spill kits.

Appendix G contains the checklist required under 40 CFR 112.20(e), documenting that a facility response plan, in addition to this SPCC Plan, is not required at this facility.

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.

TABLES



| Table 4-1 | minal 6 Tanks |
|-----------|---------------|
| ř | Term |

Containment (gallons) >1,150 >1,200 >2,200 >12,000 >1,000 >4,000 >350 >350 >250 >800 >500 >500 >280 >120 Size >55 >55 >55 >55 >55 In bermed, covered area Secondary Containment/ On containment pallets within bermed, covered Vaulted/Double-walled Grated concrete vault **Diversionary Structure** Grated concrete vault Inside oil storage room Steel containment Inside secondary with blind sump Double-walled Double-walled Double-walled Double-walled Double-walled Double-walled Double-walled Double-walled Double-walled Inside building Inside building containment Gauge Alarm Systems Gauge Nonea Nonea Nonea Gauge Nonea Nonea None **BULK ABOVEGROUND STORAGE CONTAINERS** PORTABLE CONTAINERS, TOTES, AND DRUMS Material of Construction Polyurethane Steel MOBILE GENERATORS FUEL TRUCK Up to 50 drums Up to 15 drums Up to 3 drums Up to 5 drums Up to 10 drums Quantity (gallons) 12,000 1,150 4,000 2,200 1,000 1,200 350 800 500 500 280 182 250 120 **Substance Stored** materials used to cleanup spills Empty drums, Hydraulic oil Hydraulic oil Hydraulic oil Hydraulic oil Various oils Various oils Various oils Various oils Diesel fuel absorbent Diesel fuel Gasoline Motor oil Motor oil Motor oil Used oil Used oil Diesel Diesel CDC Oil Storage Room CDC Oil Storage Room Fenced Drum Storage West of CDC Building CDC Waste Staging Transtainer Building Outside Transtainer Building Outside Transtainer Building (In Sheds) CDC Fueling Area Fueling Station **Electrical Shop** W of CDC Location Area Area Container T6-AST-12 T6-AST-10 T6-AST-11 T6-AST-8 T6-AST-9 T6-AST-1 T6-AST-2 T6-AST-3 T6-AST-4 T6-AST-5 T6-AST-6 T6-AST-7 DS-2 DS-3 DS-4 DS-5 MG-1 DS-1 ю. Ŀ

^a Drums are not equipped with gauges; however, these containers are not filled on site.

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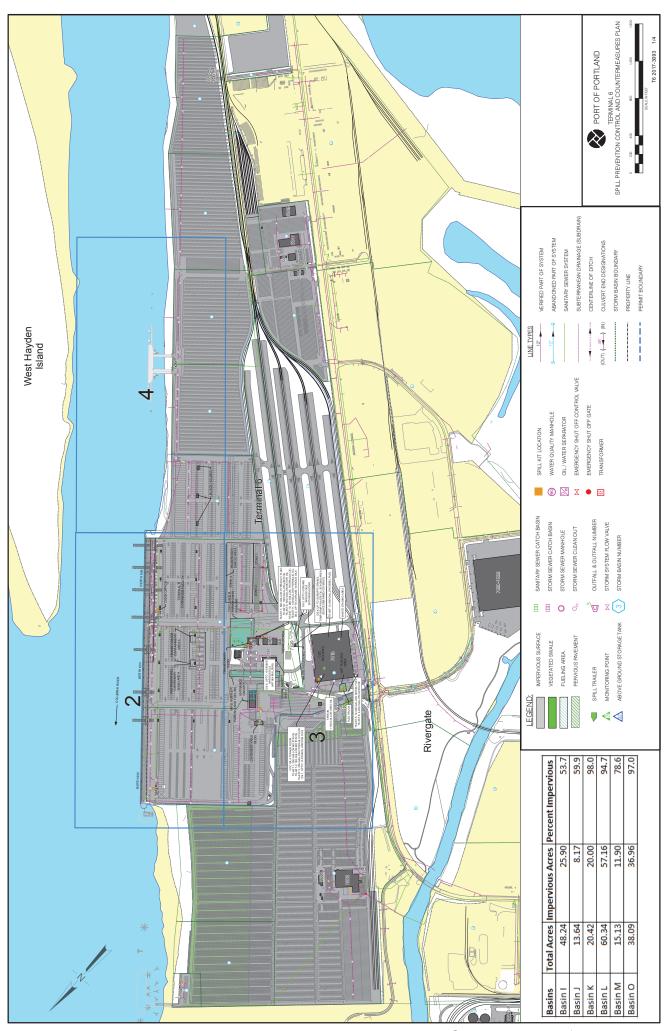
Page 1 of 1

| | Terminal 6 Transformers | | | | | | |
|------------------|-------------------------|-------------------------------|-------------------|-------|--------------|-------------|---------------------|
| Entity ID No. | Powers Equipment | Blockhouse / Location | Section / Spot | Berth | Serial No. | Oil Type | Volume (gallons) |
| 504 | Guard House | NW of Security Trailers | | | 81JB390115 | Oil | 160 |
| 507 | Main Substation | Substation W of Decant Box | | | G169913 | Oil | 242 |
| 510 | Admin Bldg. | NE of T6 Admin Bldg. | | | 15671-1 | Oil | 230 |
| 509 | Lights 604/605 | NE Corner of Toploader Lot | | | M596638 T | Mineral | 93 |
| 712 | Lights | BH 542 (Rail Scale BH) | | 604 | 96J163289 | Silicone | 150 |
| 513 | Reefer 323-4 | BH 323 | 35-A-09 | 603 | 81JD43923 | Oil | 425 |
| 517 | Lights 422 | BH 422 | 46-33 | 604 | 73D508305 | Mineral | 168 |
| 660 | Reefer | Adjacent to BH 422 | 46-38 | 604 | PCJ-1143 | Oil | 240 |
| 661 | Reefer | Adjacent to BH 422 | 46-37 | 604 | PCJ-1144 | Oil | 240 |
| 662 | Reefer | Adjacent to BH 422 | 46-36 | 604 | PCJ-1145 | Oil | 240 |
| 518 | Lights 423 | BH 423 | 46-07 | 604 | 73D508304 | Oil | 168 |
| 663 | Reefer | Adjacent to BH 423 | 46-12 | 604 | PCJ-1146 | Oil | 240 |
| 664 | Reefer | Adjacent to BH 423 | 46-11 | 604 | PCJ-1147 | Oil | 240 |
| 665 | Reefer | Adjacent to BH 423 | 46-10 | 604 | PCJ-1148 | Oil | 240 |
| 520 | Lights 521 | BH 521 | 56-59 | 605 | 73D508302 | Oil | 150 |
| 521 | Reefers | BH 522 | 56-35 | 605 | 73D508303 | Silicone | 150 |
| 620 | Reefer | BH 522 | 56-33 | 605 | PZL-1206 | Silicone | 288 |
| 522 | Reefers | BH 523 | 56-07 | 605 | 79C933100 | Oil | 225 |
| 523 | Lights 523 | BH 523 | 56-07 | 605 | 73D508306 | Oil | 168 |
| 703 | Lights | BH 621 | 66-57 | 606 | PDK-1412 | Silicone | 162 |
| 537 | Lights 311 | BH 311 | | 603 | 81JD439025 | Mineral | 160 |
| 729 | Crane 6377 | BH 313 | | 603 | PZA-0067 | Oil | 292 |
| 813 | Crane 6373 | BH 411 | | 604 | 11Jc56817003 | Mineral | 365 |
| 532 | Crane 6376 | BH 411 | | 604 | GM171904 | Mineral | 365 |
| 533 | Lights 411 | BH 411 | | 604 | 73D508102 | Oil | 146 |
| 814 | Crane 6374 | BH 412 | | 604 | 11JC56817002 | Oil | 154 |
| 815 | Crane 6375 | BH 412 | | 604 | 11JC56817001 | Oil | 154 |
| 531 | Lights 412 | BH 412 | | 604 | 73D508202 | Oil | 154 |
| 529 | Crane 6373 | BH 413 | | 604 | PXD-0307 | Mineral | 292 |
| 530 | Lights 413 | BH 413 | | 604 | 73D508103 | Oil | 146 |
| 527 | Lights 511 | BH 511 | | 605 | 73D508101 | Oil | 146 |
| 612 | Crane 6379 | Adjacent to BH 512 | | 605 | P2F-0530 | Silicone | 150 |
| 613 | Crane 6378 | BH 512 | | 605 | P175033 | Oil | 375 |
| T2 091 | Crane 6378 | Adjacent to BH 512 | | 605 | P175033 | Oil | 375 |
| 524 | Lights 513 | BH 513 | | 605 | 73D508201 | Oil | 154 |
| 525 | Crane 6375 | Cranehouse | | 605 | TAT71500102 | Mineral | 259 |
| 606 | Crane 6373 | Cranehouse | | | M156640 A | Oil | 242 |
| 607 | Crane 6373 | Cranehouse | | | M156641 A | Oil | 124 |
| 608 | Crane 6374 | Cranehouse | | | M156640 B | Oil | 242 |
| 609 | Crane 6374 | Cranehouse | | | M156641 B | Oil | 124 |
| 610 | Crane 6375 | Cranehouse | | | M163958 | Oil | 242 |
| 611 | Crane 6375 | Cranehouse | | | M163959 | Oil | 124 |

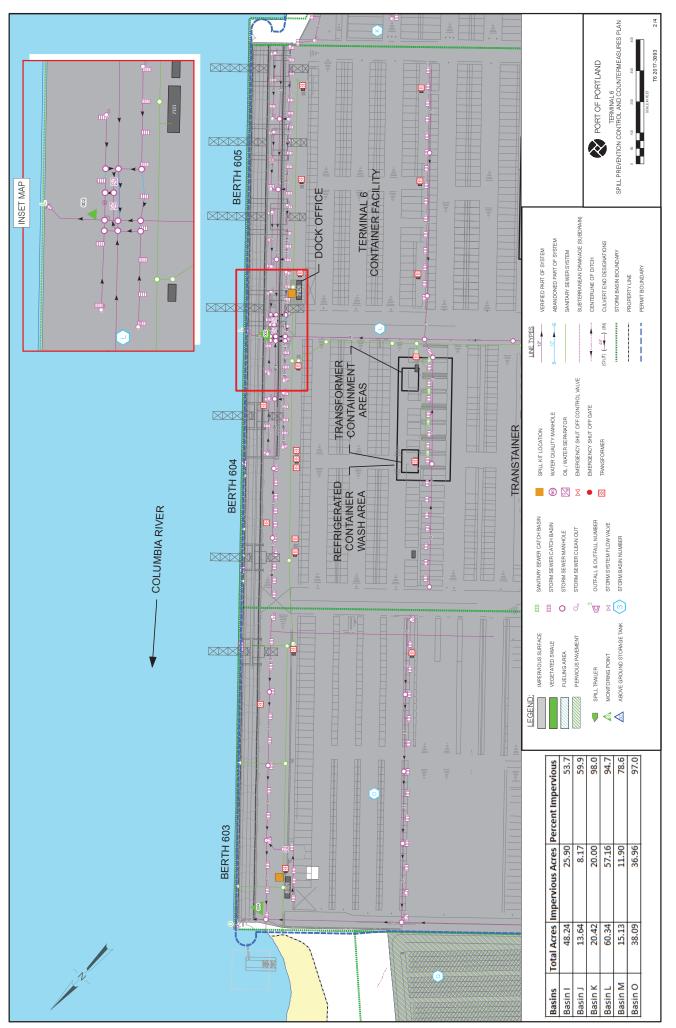
Table 4-2 Terminal 6 Transformers

FIGURES

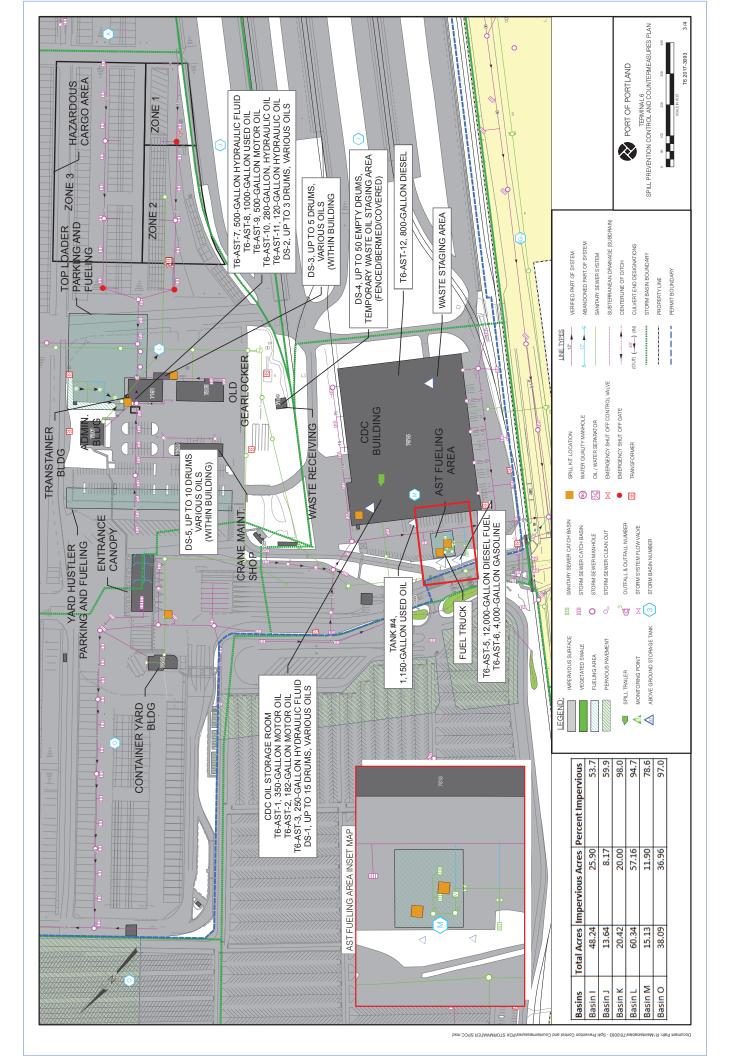




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APPENDIX A SPILL PREVENTION AND RESPONSE PROCEDURES FROM STORMWATER POLLUTION CONTROL PLAN



1.1.1

The following is a summary of spill response procedures. Non-Port operators are required to develop and implement spill prevention and response procedures specific to their operations.

PORT OF PORTLAND TERMINAL 6 FACILITY SPILL RESPONSE PLAN

PLEASE REFER TO THE FOLLOWING PROCEDURES WHEN HANDLING A SPILL INCIDENT.

********* THINK C-C-C ******* CONTROL-CONTAIN-CALL*******

- #1 CONTROL the source of the spill. STOP the flow.
- #2 CONTAIN the spill to the smallest possible area.
 - #3 CALL your supervisor for further instructions.

1.1.2 Emergency Contacts

SPILL RESPONSE/EMERGENCY CONTACTS PORT OF PORTLAND TERMINAL 6 FACILITY

The following are the phone numbers of supervisors to contact in the event of a spill:

Regardless of the time of the day.

| EMERGENCY NOTIFICATION PHONE LIST | | | | | | |
|--|---|----------------|--|--|--|--|
| PRIORITIZED CONTACT LIST | RESPONSIBLE ROLE | PHONE NUMBER | | | | |
| PORT CONTACTS | | | | | | |
| Marine Security 24-hour Contact Number | Incident Notification to Appropriate Parties | 503 240-2230 | | | | |
| PDX Communications Center | Notifies Port Environmental Spill Coordinator | 503-460-4000 | | | | |
| Marine Security | On-Duty Manager | 503 240-2226 | | | | |
| EMERGENCY RESPONSE CONTRACTORS | | | | | | |
| U.S. Ecology | Provide Spill Response and Cleanup Resources (in-water support available) | 1-800-337-7455 | | | | |
| Telluric Enterprises, LLC | Provide Spill Response and Cleanup Resources (in-water support available) | 503-505-1995 | | | | |
| Terra Hydr, Inc. | Provide Spill Response and Cleanup Resources | 503-625-4000 | | | | |

| IF A SPILL REACHES STATE'S WATER OR HAS THE POTENTIAL TO REACH THE STATE'S WATER, OR IF IN EXCESS OF 42 GALLONS, YOU MUST CALL: (Spill reporting must be made as soon as possible after initial spill response and control) | | | | | |
|---|--|------------------------------|--|--|--|
| GOVERNMENT AGENCIES (Record name of person called and time of call) | | | | | |
| Fire/Police – Portland HAZMAT Team Time: Name: | Assist in spill clean-up and fire control | 911 and/or (503) 823-3946 | | | |
| National Response Center (NRC) Time: Name: | Incident Reporting: If spill exceed CERCLA Federal Response Quantity | (800) 424-8802 | | | |
| Oregon Emergency Response System (OERS) Time: Name: | Incident Reporting Provide Spill Response Assistance | (800) 452-0311 | | | |
| Oregon Department of Environmental Quality Time: Name: | Incident Reporting Provide Spill Response Assistance | (800) 542-4011 | | | |
| U.S. Coast Guard Time: Name: | Incident Reporting | (503) 240-9370 | | | |
| EPA Office Time: Name: | Incident Reporting | (503) 326-2715 | | | |

In addition, record the name of the control officer, time, and details of the conversation on the Spill Response Notification Form in Appendix C.

1.1.3 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 v at the front of this 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.

1.1.4 Spill Contingency Plan

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

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

1.1.5 Spill Control Procedures

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

- Hydraulic reservoir failure
- Transformer failure

- Spill during loading/offloading operations
- Release from stored materials
- Spill during fueling operations.

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

- Ensure that spilled oil is contained (see map of spill kits on Figure 2)
- Cover catch basins and use pads to absorb spilled material
- Pump remaining oil into drums or other appropriate containers away from surface water or storm drains.

1.1.6 Countermeasure Procedures

Once the spill control procedures outlined above have been implemented, facility personnel will initiate countermeasure activities to contain, cleanup, and mitigate the effects of an oil 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 will be initiated as soon as 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, the oil will be removed. 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 will be cleaned up. This includes recycling any recovered oil, disposing of abatement materials used to contain and/or remove the spill, and excavating oil-contaminated soil. Disposal techniques include, but are not limited to:

- Recycling
- Disposal at an appropriate facility.

1.1.7 Emergency Response Equipment Location

The following table identifies the type and location of the emergency response equipment available at the facility (Figure 1).

| Identification | Location |
|------------------------|---|
| Spill Kit #1 | Fueling Island west side of the CDC |
| Spill Kit #2 | Fueling Island west side of the CDC |
| Spill Kit #3 | Transtainer - north |
| Spill Kit #4 | Transtainer - south |
| Spill Kit #5 | Container Yard Building - east |
| Spill Kit #6 | Adjacent to the berth 605 dock office building 7101 |
| Spill Kit #7 | Adjacent to the berth 603 dock office building 8101 |
| Spill Kit #8 | Inside CDC Building |
| Spill Response Trailer | Inside CDC Building |

Table 4.1: Emergency Response Equipment Location

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.

1.1.8 Potential Spill Locations

Table 4.2 lists the areas where potential spills of significant materials can impact stormwater runoff. These areas are shown on Figure 2.

Table 4.2: Potential Spill Locations

| Location of Potential Spills (by drainage basin) | Potential Pollutants (common name) | Comments |
|---|--|---|
| 4-1. CDC Oil Storage Room | Motor and hydraulic oils | Four steel tanks rest on a concrete vault or other secondary containment. The concrete floor is sloped toward the northwest wall of the building, which provides adequate secondary containment for drums stored in the room. |
| 4-2. CDC Fueling Area | Diesel and Unleaded Gasoline Fuels | Fueling done on pad with oil/water separator that drains to sanitary sewer system and tank is double walled. |
| 4-3. Used Oil Tank | Used Oil | Product spilled on the pavement during transfer or released from secondary containment would likely be captured behind the concrete barriers that protect the tank. |
| 4-4. Transtainer Building | Motor oil, hydraulic oil, and used oil. | Product is stored in double-walled tanks, or in drums stored on containment pallets or spill control |

| Location of Potential Spills (by drainage basin) | Potential Pollutants (common name) | Comments |
|---|---------------------------------------|--|
| | | pallets inside the building. |
| 4-5. Transformers | Transformer Oil | The oil is sealed within each transformer and is not drained or added to the transformer on a routine basis. |
| 4-6. Fuel Truck | Diesel Fuel | The fuel truck tank is double-walled and is parked on the CDC Fueling Area. |
| 4-7. Gensets | Diesel Fuel | A spill response kit sized to capture 120 gallons is maintained in the immediate vicinity of the gensets. |
| 4-8. Mobile Generator | Diesel Fuel | A spill trailer stocked with adequate secondary containment equipment for this tank is located just inside the nearby CDC building. |
| 4-9. Fenced Drum Storage | Spill Cleanup Materials | A significant spill is unlikely; containers generally contain oil-contaminated absorbent material. |
| 4-10. Product in Transmodal Containers | Miscellaneous products | Transmodal containers containing products are generally present only during active Terminal operations, currently suspended. |

1.1.9 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. Port spill kits include 55-gallon drums to be used for receiving spilled materials. Personal protective equipment (respirators, safety goggles, boots, and gloves), first aid, and biohazard kits are maintained in the Maintenance Tool Room. Fire extinguishers and ventilation equipment are also available at the facility. Non-Port operators are responsible for training their staff and contractors on their spill plan and for providing spill cleanup equipment appropriate for their industrial activities at Terminal 6.

1.1.10 Monthly Inspections

Inspections will be conducted monthly when there is rainfall and just prior to the onset of the rainfall season. Inspections will be conducted at the locations identified in Section 4.2.2 and on Figure 2. In addition, the stormwater control structures will also be inspected. Use **Form B** to record the results of the inspection. Upon completion of the inspection, cleaning and repair activities should be conducted and documented as described in Section 4.4.

The Port's Environmental Operations and/or MFM staff will conduct monthly inspections of source areas and stormwater controls within the permitted areas of Terminal 6. The inspections will be documented on the SWPCP Monthly Inspection Form (Appendix B). Inspection forms will be kept on file in the Port of Portland Administration Office.

Non-Port operators are responsible for conducting monthly inspections of their leased areas and areas within their control in compliance with Schedule B of the 1200-COLSB permit. Inspections of source areas and site controls will be documented, kept onsite for at least three years and made available to the Port, DEQ or local municipality upon request.

Port Environmental Operations and/or Marine Facilities Maintenance staff will conduct inspections of catch basins, inlets and manholes within the non-leased 1200-COLSB permitted areas. Terminal 6 has approximately 250 catch basins, inlets or manholes within the 1200-COLSB permitted area. Many of these are located in areas that have very low probability for impacts to stormwater. <u>The catch basins, manholes and inlets within the high-risk area</u> (Materials Storage Area) will be inspected monthly. The inspections will be documented on the SWPCP Monthly Inspection Form. Inspection forms will be kept on file in the Port Administration Office.

1.1.11 Inspection Areas

General inspection areas will include:

Catch basins Roofs and covers (for potential leaks) Secondary containment areas All storage tanks Material handling and storage areas Waste storage, handling, and process areas All areas of potential spills (for possible contamination). Industry-specific inspection areas include the following:

Pressure washing area Any blasting, sanding, and painting areas Material storage areas Engine maintenance and repair areas, material handling areas General yard area

1.1.12 Cleaning and Repair Program

Cleaning, maintenance, and repair of all materials handling and storage areas and stormwater control measures, structures, catch basins and treatment facilities will be performed in such a manner as to prevent the discharge of pollution. Catch basins will be cleaned annually, at a minimum, by the Port's MFM Department. For cargo shipments which have an abnormally high amount of particulate (dusts or debris), the stevedoring company managing the shipment will conduct a post-transfer inspection of the catch basins and replace filters and clean as necessary. The structural condition of the catch basins will be disposed of appropriately. Catch basin sediment will be removed as needed by the MFM or a Port contractor. Catch basin cleaning records and water quality laboratory results will be kept on file in the Port of Portland Administration Office.

The schedule for cleaning and repairing stormwater management control structures will be based primarily on the results of the monthly inspections. The following cleaning and repair activities will be conducted:

- Repair and cleaning of catch basins
- Regular replacement of catch basin filters
- Maintenance of all equipment and tanks where spills or leaks are possible
- Maintenance of all container-moving equipment and other vehicles that are used or parked in the facility to help prevent leaks.

As an additional component of this program, proper traditional "housekeeping" practices will be performed by maintenance staff to keep the facility in a clean and orderly condition. These practices include:

- Maintenance of clean, dry floor, and ground surfaces
- Periodic cleanup of debris and recyclable material
- Proper labeling and identification of chemical substances present in the workplace, and maintenance of Material Data Safety Sheets (MSDS) for each substance (Right-to-Know program)
- Facility-wide sweeping of impervious surfaces annually and on an as-needed basis depending on the frequency of facility operations.
- Proper material container storage practices (to prevent stormwater exposure or damage)
- Proper disposal of old equipment and waste products

1.2 Employee Education Schedule

The Employee Awareness Program is designed to familiarize all employees with the intent and components of the SWPCP. Training will be provided for all existing employees on an annual basis, and within 30 days of hire for all new employees when they begin work at the Port of Portland Terminal 6 facility.

For all personnel, topics in the training session may include:

- Importance of preventing stormwater pollution
- Contents of the SWPCP
- Spill prevention and internal reporting procedures
- Materials handling and storage procedures
- Proper painting procedures

Sector Q (Water Transportation)-specific training topics will include

- Used oil management
- Spent solvent management
- Disposal of spent abrasives
- Disposal of vessel wastewaters (if occurs)
- Spill prevention and control
- Fueling procedures
- General good housekeeping practices
- Painting and blasting procedures (if used)
- Used battery management.

Selected maintenance personnel will be trained in preventive maintenance procedures and inspection procedures.

All SWPCP training records will be maintained for at least three years.

1.3 Record Keeping and Internal Reporting Procedures

The Port of Portland is required to demonstrate the implementation of various components of the SWPCP. Records of the following events or activities will be maintained with the SWPCP documentation:

- Incidents of spills or leaks,
- Surface water discharges,
- Sampling/monitoring program (see Monitoring Plan) and
- Inspection and maintenance records.

Incidents of spills or leaks may require local, state, or federal agency notification. See the SPCC for the notification details. All records will be dated and signed by the person recording the events or activities. Records of the monthly inspections, preventive maintenance practices, cleaning and repair activities, and all stormwater monitoring data will be maintained for a period of **three years** with the SWPCP documentation.

Additional information regarding the monitoring data records is found in Section 6.4.

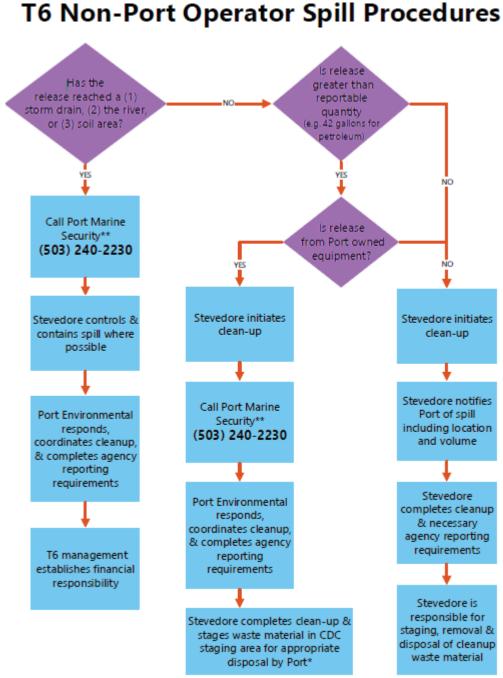


Figure 3 Non-Port Spill Response Coordination

*Port will dispose of waste material. Financial responsibility will be determined by Port Terminal Manager **Marine Security calls Port Environmental

APPENDIX B SPCC PLAN REVIEW AND AMENDMENT LOG



PORT OF PORTLAND – TERMINAL 6, 7201 N MARINE DRIVE SPCC PLAN REVIEW AND AMENDMENT LOG I have completed review and evaluation of the SPCC Plan for the Vancouver, Washington site and will/will not amend the SPCC Plan as a result.

| ewer Name Reviewer Signature | n P. Taylor, PE | n P. Taylor, PE | | | | |
|------------------------------|-------------------------------|-------------------------------|----------|----------|----------|----------|
| Will Amend Reviewer Name | Yes / No Steven P. Taylor, PE | Yes / No Steven P. Taylor, PE | Yes / No | Yes / No | Yes / No | Yes / No |

| Reviewer Signature | Still | Stil | · | | |
|--------------------------|----------------------|-----------------------------|---|--|--|
| Reviewer Name | S. Taylor | S. Taylor | | | |
| Date | 06/12/2017 | 1/4/2023 | | | |
| Description of Amendment | Rewrite of SPCC Plan | Five-year review and update | | | |
| Amendment Number | 0 | | | | |

APPENDIX C MATERIAL HANDLING PROCEDURES



PORT OF PORTLAND MARINE TERMINAL 6, PORTLAND, OREGON MATERIAL TRANSFER PROCEDURES

Tanker truck unloading procedures

- The Port requires drivers of petroleum transfer trucks to comply with Department of Transportation regulations in 49 CFR part 177, rail deliveries to comply with 49 CFR 174, and all deliveries to comply with facility standard operating procedures.
- Truck drivers notify Terminal 6 personnel when arriving on site.
- Existing tank volume must be checked before tank filling begins to ensure that the tank can hold what the supplier intends to deliver.
- Ensure that the truck car contains the right product for the tank.
- Ensure that adequate spill response equipment is on board the vehicle or available on site.
- Pumping operations must be continuously attended.

To capture released oil in the stormwater system

In the event of a spill, close the valve at the outlet of the oil/water separator that treats water draining to the two catch basins located at the fuel station. The oil/water separator would capture approximately 200 gallons of spilled fuel. Closing the valve blocks direct flow to the river.

Close the valve downstream from the catch basin west of the fueling station tanks to contain potential spills in this area. This closed system has a 50-gallon holding capacity for spilled fuel. Closing the valve blocks direct flow to the river.

Materials arriving in 55-gallon or smaller drums, buckets, or other containers

Fifty-five-gallon drums of oil are transported by forklift to the drum storage areas.

Manual pumping procedures:

- A hand pump is screwed securely into the drum bung.
- Material is dispensed through a rubber hose into a 5-gallon or smaller container and hand-carried to its destination.
- The pump and rubber hose are inspected for leaks and deterioration at each use. The hose is replaced when significant deterioration is detected.

Terminal 6 drum handling policy

- Drums are compatible with the materials stored and required conditions of storage such as pressure and temperature.
- Drums being transported shall be appropriately secured before transport.
- Drums, whether empty or full, will be protected from rain to prevent in-leakage of water.
- Drum storage areas are established. Drums with product are not to be stored outside of designated areas.

Material Transfer Procedures Page 2

- Drum storage areas are inspected regularly to check for 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.
- Drums are to be picked up and handled in an appropriate manner.

Used oil

Terra-Hydr is contracted to pump any used oil and transport it off site for disposal.

Collection operations (used products)

- Identify contents to be placed in the collection system.
- Unidentified contents will not be placed in the collection system. Notify management for guidance.
- Verify the appropriate container for the material. Remember, all tanks will be clearly marked as to the contents for that container. Do NOT mix contents.
- Visually inspect the used container to verify that it has no leaks or seeps.
- Remove the lid of the tank and carefully pour the product into the appropriate tank. Care must be taken to collect the full amount of the product.
- Return the tank lid to its original position.
- Verify that contents have not been spilled.

Labeling requirements

Containers will be clearly marked to indicate which product is to be contained. Tanks will be used to store only the material for which they are labeled. Under NO circumstances will products be mixed or deposited in inappropriate tanks.

Any observed spills or leaks are cleaned up as soon as possible by Terminal personnel.

APPENDIX D INSPECTION AND MAINTENANCE FORMS



Monthly SPCC Inspection Form Terminal 6, Port of Portland

| | Inspected by | y: | Signatu | ure: | Date: | Time: | |
|---|------------------|--|--|---|---|--|----------|
| Location | Container No. | Contents | Capacity (gallons unless noted) | OK = Ac | K = Acceptable X= Not Acceptable NA = Not Applicable | | Comments |
| | | | | Container | Valves, Piping, & Appurtenances | Secondary Containment | |
| CDC Oil | T6-AST-1 | Motor oil | 350 | | | | |
| Storage | T6-AST-2 | Motor Oil | 182 | | | | |
| Room | T6-AST-3 | Hydraulic oil | 250 | | | | |
| CDC Waste Storage Area | T6-AST-12 | Diesel fuel | 800 | | | | |
| West of CDC | T6-AST-4 | Used oil | 1,150 | | | | |
| CDC Fueling | T6-AST-5 | Diesel fuel | 12,000 | | | | |
| Area | T6-AST-6 | Gasoline | 4,000 | | | | |
| Outside | T6-AST-7 | Hydraulic oil | 500 | | | | |
| Transtainer | T6-AST-8 | Used oil | 1,000 | | | | |
| Building | T6-AST-9 | Motor oil | 500 | | | | |
| | T6-AST-10 | Hydraulic oil | 280 | | | | |
| | T6-AST-11 | Hydraulic oil | 120 | | | | |
| Portable Conta | iners, Totes, o | and Drums | | | | | |
| CDC Oil Storage | DS-1 | Various oils | Up to 15 drums | | NA | | |
| Outside Transtainer Building (In Sheds) | DS-2 | Various oils | Up to 3 drums | | NA | | |
| Within Transtainer Building | DS-3 | Various oils | Up to 5 drums | | NA | | |
| Fenced Drum Storage Area | DS-4 | Empty drums, absorbent materials used to cleanup spills | Up to 50 drums | | NA | | |
| Within Electrical Shop | DS-5 | Various oils | Up to 10 drums | | NA | | |
| Transformers | NA | Oil | various | | NA | NA | |
| Mobile Genera | tors and Ge | nsets | | | | 1 | I |
| W of CDC | MG-1 | Diesel fuel | 1,200 | 1 | | | |
| | 10-1 | Dieseribei | 1,200 | | | | |
| Fuel Truck Fueling | T-1 | diesel | 2,200 | | | | |
| Station | | 0.000 | 2,200 | | | | |
| Maintenance Y Heavy-Duty Ve | , | various | various | | | NA | |
| noted location, visually inspect and note any deficiencies for the following equipment and/or systems (as applicable): | | Signs of leaks Shell distortion Signs of settling Corrosion Tank coatings, insulation, and exterior Condition of tank foundations/supports Emergency vents (check o-rings and gaskets on emergency vents annually) Leak detection (if applicable) Water in tank Water in interstitial space | | tions/supports o-rings and ents annually) | Check piping, valves, vents, for: Check containment area for: | Signs of leaks Support integrity Insulation Valves locked as appropriate Unused pipes blind-flanged Signs of spills Site drainage Integrity Valves sealed closed Fences secured | |

 $R: 0232.26 \ Port of \ Portland \ - \ T6 \ Document \ 005 \ 2023.01.04 \ SPCC \ Appendices \ App \ D \ - \ Monthly \ Inspection \ Form. docx \ Not \ App \ D \ - \ Monthly \ Inspection \ Form. docx \ Not \ Not$

Monthly SPCC Transformer Inspection Form Terminal 6, Port of Portland

| Inspected by: | | pected by: | Signature: | Date: Time: |
|-----------------|------------------|----------------------------|---|-------------|
| Map Location | Entity ID No. | Blockhouse / Location | OK = Acceptable X= Not Acceptable NA = Not Applicable | Comments |
| Α | 504 | NW of Security Trailers | | |
| В | 507 | Substation W of Decant Box | | |
| С | 510 | NE of T6 admin Bldg. | | |
| D | 509 | NE Corner of Toploader Lot | | |
| E | 712 | BH 542 (Rail Scale BH) | | |
| F | 513 | BH 323 | | |
| G | 517 | BH 422 | | |
| G | 660 | Adjacent to BH 422 | | |
| G | 661 | Adjacent to BH 422 | | |
| G | 662 | Adjacent to BH 422 | | |
| Н | 518 | BH 423 | | |
| Н | 663 | Adjacent to BH 423 | | |
| н | 664 | Adjacent to BH 423 | | |
| Н | 665 | Adjacent to BH 423 | | |
| I. | 520 | BH 521 | | |
| J | 521 | BH 522 | | |
| J | 620 | BH 522 | | |
| K | 522 | BH 523 | | |
| K | 523 | BH 523 | | |
| L | 703 | BH 621 | | |
| Μ | 537 | BH 311 | | |
| N | 729 | BH 313 | | |
| 0 | 813 | BH411 | | |
| 0 | 532 | BH 411 | | |
| 0 | 533 | BH 411 | | |
| Р | 531 | BH 412 | | |
| Р | 814 | BH 412 | | |
| Р | 815 | BH 412 | | |
| Q | 529 | BH 413 | | |
| Q | 530 | BH 413 | | |
| R | 527 | BH 511 | | |
| S | 612 | Adjacent to BH 512 | | |
| S | 613 | BH 512 | | |
| S | T2 09 1 | Adjacent to BH 512 | | |
| T | 524 | BH 513 | | |
| Т | 525 | BH 513 | | |
| U | 606 | Crane 6373 | | |
| U | 607 | Crane 6373 | | |
| V | 608 | Crane 6374 | | |
| V | 609 | Crane 6374 | | |
| W | 610 | Crane 6375 | | |
| W | 611 | Crane 6375 | | |

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

- Signs of leaks, shell distortion, or corrosion

- Where possible, signs of settling and the condition of tank foundations/supports

- Where possible, condition of coatings, insulation, and exterior

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

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

Monthly Spill Kit Inspection Form Terminal 6, Port of Portland

| Inspected | by: | Signature: | Date: | Time: |
|------------------------------|--|--|--|----------|
| Identification | Location | Equipment | OK = Acceptable X= Not Acceptable NA = Not Applicable | Comments |
| Spill Kit #1 | North corner of AST Fueling Area | absorbent pads/ booms/drain cover | | |
| Spill Kit #2 | South corner of AST Fueling Area | absorbent pads/booms | | |
| Spill Kit #3 | Transtainer—North | absorbent pads/ booms/drain cover | | |
| Spill Kit #4 | Transtainer—South | absorbent pads/booms | | |
| Spill Kit #5 | Mobile Generator (west of Entrance Canopy) | absorbent pads/booms | | |
| Spill Kit #6 | Dock Office 605 (Building 7101) | absorbent pads/booms | | |
| Spill Kit #7 | Dock Office 603 (Building 8101) | absorbent pads/booms | | |
| Spill Response Trailer | CDC Building | 5 cases absorbent pads/booms 6 traffic cones 3 empty waste barrels 8 sacks peat-moss-based absorbent 4 brooms 4 shovels 2 bases boom socks 2 drain covers 6 pairs rubber gloves 6 disposable Tyvek overalls | | |
| dditional comme | ents: | 2 drain covers 6 pairs rubber gloves | | |





PORT OF PORTLAND – TERMINAL 6 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 |
|-----------------------------|---------------------|
| | |
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| 1110 | training | conducted | on. |

APPENDIX F SPILL RESPONSE AND NOTIFICATION FORMS



| | ■ 6 ■ | | | | | | | | |
|--|--|-----------------------------|------------------------|------------------------|--------------|--|---------------------|----------------------------|---|
| 💸 PORT OF PORTLAND Home 🖓 Merts 🖓 Threads 🕅 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 | Spill Location INCIDENT SPECIFIC LOCATION ADDRESS | Facility Location * | <pre>Company</pre> Company | Submit Entry Save as Draft Reset Cancel |

| $\overline{\otimes}$ | 💸 PORT OF PORTLAND Home 🖓 Home 🖓 Threads 🛛 Rooms 🕨 Start a Room | | ð |) () () () |
|----------------------|--|---|---|---------------------|
| E | Port of Portland [ORG] / Environmental Operations [GROUP] / Spill Response [ROOM] / Spill Response Report [FORM] / New Entry [FORM ENTRY] | • | e | • |
| | Company Company Company ADRESS ADRESS ADRESS ADRESS Contact Number Contact Number 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 | | | |

| Tengency: Select all that apply. Tengency: Select all that apply. | C | |
|---|------|--|
| Inform source) lons larger that - 22 galonof T area (voic/ corrosio/ fammable / reactive)? gency spli. | 1.11 | ²³ Emergency Spill Determination - if any of scenarios below are true, then the spill is an emergency. Select all that apply. * |
| Inform source) Inst Tage than 42 galancs Tage turburum Tage turburum Bency spill. | | □ Impact o a waterway |
| Internet 4 galones* Lare is unknown gency split. | | Ergitite spill (sheen from an unknown source) |
| Incertain 42 galors? ce la unknom arrea (toxi/ corrosive / flammable / reactive)? gency spill. | | □ The spill larger than 50 sqf? |
| larger that 2 galors? area (avit / corrosive / flammable / reactive)? gancy spill. | | |
| den to submuni geno spill. | | The spill petroleum or oil and larger than 42 gallons? |
| | | |
| | | In spin is a nazaroous substance (toxic / corrosive / nammable / reactive) / Non of the above management and |
| | | |
| | | Select AII |
| | | |
| erv/Shp erv/Shp Ing Ing Ing Ing Ing Ing Ing Ing Ing Ing | | C HAZARDOUS SUBSTANCE |
| iy/Ship ing ing in atom breakit sak | | Material Involved |
| ing Ship In In aton Breakti aak | | - Fuel |
| sy/Ship ling in r n n ment pment pment | | 0 |
| ry/Ship ling ir n ation pertect/cark | | Sewage |
| ary/Ship ling lir lir n ation pment e Recark/Loak | | Deicing Fluid |
| ry/Ship Ing Ir Ir In ation Preak/I eak | | □ Other |
| iry/Ship ing ir ir ir in ation pment e Break/I eak | | SelectAII |
| ing ing ir ir ir ir n ation pment e Break/I eak | | Cause of Incident |
| | | □ Abandoned |
| | | During Delivery/Ship |
| | | During Handling |
| | | During Repair |
| | | Excavation |
| | | Fire Explosion |
| | | Fueling Operation |
| | | □ Leaking Equipment |
| | | □ Hurdraulic I ine Rreak/I eak |
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JOICHTMIN

- Cause of Incident ₮
- During Delivery/Ship Abandoned
 - During Handling
 - During Repair \square
 - Excavation
- Fire Explosion
- Fueling Operation
 Leaking Equipment
 Hydraulic Line Break/Leak
- Storage
- Vehicle Accident
 Unauthorized Release
 Unknown
 Other

Select All

Estimated Quantity

C RESPONDERS

- Responders

- Maintenance
 Ops
 Environmental Operations
 FIRE
 Police
 Responsible Party
 Environmental Contractor
 Lono Shore /I WI II

→ RESPONDERS

- Responders
- Maintenance

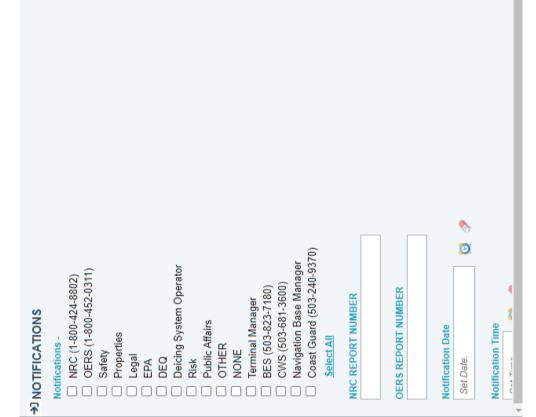
- Ops
 Environmental Operations
 FIRE
 Police
 Responsible Party
 Responsible Contractor
 Environmental Contractor
 Long Shore (ILWU)
 Navigation Staff
 Harbor
- Select All

ENVIRONMENTAL CONTRACTOR

- TERRA HYDR INC
 NRC INC
 CLEAN HARBORS
 OTHER
- Select All

OTHER (SPECIFY)

- OTIFICATIONS
- Notifications -
- NRC (1-800-424-8802)
 OERS (1-800-452-0311)
 Safety
 Properties



| →J Notification Time Set Time. | CEVENT OCCURRENCE HOW DID THE SPILL OCCUR | RELEASE TO STORM SYSTEM? select an option System? select an option System? DRAINAGE BASIN & OUTFALL NUMBER? | ACTIONS TAKEN TO CLEAN UP SPILL | COMMENTS |
|-----------------------------------|--|--|---------------------------------|----------|

| | × | | | |
|---|--|-----------|--------------|---------------|
| → Photos Photo Photo + Choose a File | PERSON MAKING REPORT Type name or email Danelle Peterson | Signature | Done Signing | Status Status |

APPENDIX G 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 112.20.



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

FACILITY NAME: Port of Portland – Terminal 6

FACILITY ADDRESS: 7201 North Marine Drive

Portland, Oregon

- 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 ____
- 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 ____
- 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 ____
- 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?

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 _____

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

Yes _____