

# **SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN**

## **FACILITY:**

**Winslow Township Municipal Complex  
125 South Route 73  
Braddock, NJ 08037**

**December 2018**

## **Prepared For:**



**Township of Winslow  
Camden County, New Jersey**

## **Prepared By:**



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## LIST OF ACRONYMS AND ABBREVIATIONS

AST	Aboveground Storage Tank
EPA	U.S. Environmental Protection Agency
NPDES	National Pollutant Discharge Elimination System
PE	Professional Engineer
POTW	Publicly Owned Treatment Works
SPCC	Spill Prevention, Control, and Countermeasure
STI	Steel Tank Institute
UST	Underground Storage Tank
WTPWD	Winslow Township Public Works Department

# INTRODUCTION

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by Winslow Township Public Works Department (WTPWD) located on 125 South Route 73, Braddock, New Jersey, to prevent oil discharges from occurring, and to prepare WTPWD to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the premises of Winslow Township Municipal Complex (WTMC). This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in 40 CFR Part 112.

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with WTPWD employees and contractors, as a guide on facility inspections, and as a resource during emergency response.

Winslow Township Public Works Department management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that Winslow Township Public Works Department must perform to comply with the SPCC rule:

- The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or
- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review.
- Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.
- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).
- Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

## PART 1: PLAN ADMINISTRATION

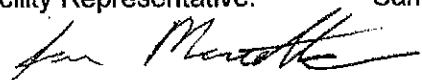
### 1.1 Management Approval and Designated Person [40 CFR 112.7]

WTPWD is committed to maintaining the highest standards for preventing discharges of oil to navigable waters and the environment through the implementation of this SPCC Plan. This SPCC Plan has the full approval of WTPWD management who has committed the necessary resources to implement the measures described in this Plan.

Sam Martello is the Designated Person Accountable for Oil Spill Prevention at this facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative: Sam Martello

Signature:



Title:

Director of PWD

Date:

12/17/18

## 1.2 Professional Engineer Certification [40 CFR 112.3(d)]

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

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112.

Signature



Date 12/17/2018

Mohammad R. Zaman, Ph.D., PE  
Name of Professional Engineer

24GE04798000  
Registration Number

New Jersey  
Issuing State



### 1.3 Location of SPCC Plan [40 CFR 112.3(e)]

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC is maintained at the WTPWD located at 125 South Route 73, Braddock, NJ 08037. The front office is attended whenever the facility is operating, i.e., 8:00 AM to 5:00 PM, 5 days per week (closed on Saturday and Sundays).

### 1.4 Plan Review [40 CFR 112.3 and 112.5]

#### 1.4.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), WTPWD periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning of underground and aboveground storage tanks;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter drainage system; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- Change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- Change in the name or contact information of spill response or cleanup contractors.

WTPWD must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Director of WTPWD (Facility Manager) is responsible for initiating and coordinating revisions to the SPCC Plan.

#### 1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5, WTPWD reviews this SPCC Plan at least once every five years. Revisions to the Plan, if any are needed, are made within six months of this five-year review. WTPWD will implement any amendment as soon as possible, but no later than six months following preparation of any amendment. A registered PE certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d).

Scheduled five-year reviews and Plan amendments are recorded in Table 1-1. This log must be completed even if no amendment is made to the Plan. Unless a technical or administrative

change prompts an earlier review, the next scheduled review of this Plan must occur by February 19, 2022.

**Table 1-1: Record of Plan Review and Changes**

Date	Authorized Individual	Review Type	PE Certification	Summary of Changes
12/17/17	Sam Martello	Initial Plan	Yes	N/A

**1.5 Cross-Reference with SPCC Provisions [40 CFR 112.7]**

This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR Part 112.

**Table 1-2: SPCC Cross-Reference [40 CFR 112.7]**

<b>Provision</b>	<b>Plan Section</b>	<b>Page</b>
112.3(d)	Professional Engineer Certification	3
112.3(e)	Location of SPCC Plan	4
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112.7(e)	3.5 Inspections, Tests, and Records	18 Appendix D
112.7(f)	3.6 Personnel, Training and Discharge Prevention Procedures	24
112.7(g)	3.7 Security	26
112.7(j)	3.8 Conformance with Applicable State and Local Requirements	26
112.8(b)	4.1 Facility Drainage	27
112.8(c)(1)	4.2.1 Construction	29
112.8(c)(2)	4.2.2 Secondary Containment	29
112.8(b)(1)	4.1.1 Drainage from Diked Storage Areas	27
112.8(c)(4)	4.2.3 Corrosion Protection	30
112.8(c)(6)	4.2.4 Inspections and Tests Appendix D - Facility Inspection Checklists	30 Appendix D
112.8(c)(8)	4.2.6 Overfill Prevention System	30
112.8(c)(10)	4.2.8 Visible Discharges	32
112.8(c)(11)	4.2.9 Mobile and Portable Containers	32
112.8(d)	4.3 Transfer Operations, Pumping, and In-Garage Maintenances	32
112.20(e)	Certification of Substantial Harm Determination	Appendix B

## **PART 2: GENERAL REQUIREMENTS AND FACILITY INFORMATION [40 CFR 112.7]**

### **2.1 General Information**

Spill Prevention, Control, and Countermeasure (SPCC) plans for facilities are prepared and implemented as required by the U.S. Environmental Protection Agency (U.S. EPA) Regulation contained in Title 40, Code of Federal Regulations, Part 112, (40 CFR 112). A non transportation related facility is subject to SPCC regulations if: the aggregate aboveground capacity of the facility exceeds 1,320 gallons (excluding those tanks and oil filled equipment below 55 gallons in capacity) or if the aggregate underground capacity of the facility exceeds 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of state programs approved under 40 CFR Part 281.); and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States. An SPCC plan is not required to be filed with the US EPA, but a copy must be available for onsite review by the Regional Administrator (RA) during normal working hours. The SPCC plan must be submitted to the US EPA Region II RA and the state agency along with the other information specified in Section 112.4 (a) if either of the following occurs:

- 1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event; or*
- 2. The facility discharges oil in quantities greater than 42 gallons in each of two spill events within any twelve-month period.*

The following spill information must be submitted to the RA within 60 days if either of the above thresholds is reached. This report is to contain the following information (112.4 (a)):

1. Name of the facility.
2. Name of the individual submitting the information.
3. Location of the facility.
4. Maximum storage or handling capacity of the facility and normal daily throughput.
5. The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and/or replacements.
6. Description of the facility including maps, flow diagrams, and topographical map.
7. The cause(s) of such spill(s), including a failure analysis of system or subsystem in which failure occurred.
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
9. Such other information as the Regional Administrator may reasonably require that is pertinent to the plan or spill event(s).

The SPCC plan must be amended within 6 months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The SPCC plan must be reviewed at least once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly

reduce the likelihood of a spill event and has been proven in the field. All such amendments must be re-certified by a registered professional engineer (PE). Owners and operators failing or refusing to comply with this federal regulation are liable to a civil administrative penalty of up to \$11, 000 per day (up to a maximum of \$ 127, 500) or judicial civil penalties of up to \$ 27, 500 per day. If the owners and operators of a facility that are required to prepare an SPCC plan and are not required to submit a Facility Response Plan, the SPCC plan should include a signed certification form, provided in Page 8 (per Appendix C to 40 CFR 112).

## 2.2 Facility Description [40 CFR 112.7(a)(3)]

Name: Winslow Township Municipality Complex

Address: 125 South Route 73  
Braddock, NJ 08037-9422

Type: Maintenance Garage

Date of Establishment: 1976

Date of Initial SPCC Related Operations: 2009

Owner/Operator: Winslow Township Department of Public Works  
Winslow, Camden, New Jersey

Primary Contact: Sam Martello, Director of Public Works  
Work Tel: 609-567-0700 Ext. 9000  
Cell (24 hours): (609)204-5777

### 2.2.1 Location and Activities

The Winslow Township Municipality Complex is located in Braddock, New Jersey (Figure 1). Three (3) masonry buildings are present on site, most of which are used for official activities, equipment storage, and vehicle maintenance. A portion of area around each of the buildings is paved with asphalt for parking purposes. All buildings are currently maintained and in general, appear to be in good condition.

There is a maintenance garage / automobiles repair facility for the maintenance of various utility trucks and passenger cars. The vehicle wash wastewater is collected from the garage floor through the floor catch basins and directed into an Oil Water Separator (OWS) and spent oil is transferred into a waste-oil storage tank. The OWS effluent is discharged into the sanitary sewers.

Currently, there are two aboveground storage tanks (ASTs) and 16 @55-gallons portable steel drums, two (2) regulated underground storage tanks (USTs), and one (1) unregulated oil water separator at the site, the size and contents of which are summarized in Section 1.1.5.1.

### 2.2.2 Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the Director of Public Works Department, Sam Martello. Extended 24-hour contact information is provided in Table 2-1.

Informal daily examinations of the facility equipment as described in Section 3.6 of this SPCC Plan are provided by the designated trained employees of WTPWD. Key contacts for WTPWD are included in Table 2-1.

*Table 2-1: Extended Facility Contact Information*

Name	Title	Telephone	Address
Joseph Gallagher	Township Administrator	609-567-0700 Ext 5005	125 South Route 73 Braddock, NJ 08037
Sam Martello	Director, WTPWD Facility Manager	609-567-0700 Ext 9000 609-206-5876 (M)	125 South Route 73 Braddock, NJ 08037
Dave Pantalone	Facilities/NJ Class A/B UST System Operator	609-567-0700 Ext 9002 609-744-1971 (M)	125 South Route 73 Braddock, NJ 08037
Michael Passerella	Supervising Technician	609-567-0700 Ext 9006 609-668-7209 (M)	125 South Route 73 Braddock, NJ 08037

### 2.2.3 Facility Layout Diagram [40 CFR 112.7(a)(3)]

Appendix A, at the end of this Plan, shows a general site plan for the facility. The site plan shows the site topography and the location of the facility relative to waterways, roads, and inhabited areas. Figure A-1 in Appendix A shows the general location of the facility on a U.S. Geological Survey topographic map. Figure A-2 in Appendix A presents a layout of the facility and the location of storage tanks. The diagram also shows the location of stormwater drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of ASTs, USTs, and transfer stations and connecting piping. Figure A-3 shows the designated parking locations of the fuel delivery trucks to be used during the transfer operations. There is no loading / unloading rack at the site.

### 2.2.4 Petroleum Products Storage

Containers for petroleum products storage at the facility consists of one (1) 956-gallon aboveground storage tank containing diesel fuel for emergency generator, one (1) 500-gallon waste oil storage tank, ten (20) 55-gallon steel drums for transmission and motor oils, one (1) 1000-gallon unregulated underground Oil Water Separator for vehicle wash wastewater (exempt from SPCC compliance requirements), one (1) 10,000-gallon regulated double-wall fiberglass underground storage tank for gasoline (exempt from SPCC compliance requirements), one (1) 10,000-gallon regulated underground storage tank for diesel (exempt from SPCC compliance requirements).

All petroleum product storage tanks are shop-built and meet the American Petroleum Institute (API) tank construction standards. Their design and construction are compatible with the oil they contain and the temperature and pressure conditions of storage.

The aboveground storage tanks are connected with aboveground underground piping systems for fuel supply. The USTs are connected with underground and aboveground piping systems in compliance with the regulatory requirements. The double-wall piping annular spaces are vacuum-monitored continuously and/or vacuum-tested annually. The aboveground piping systems in fuel dispensing area are constructed of single-wall steel pipes painted white. Table 2-2 lists all oil containers present at the facility with capacity of 55 gallons or more subjected to SPCC compliance requirements.

**Table 2-2: Oil Containers at WTPWD**

ID	Location	Type	Construction	Primary Content	Capacity (gallons)
Tank AST-D	Emergency Generator	AST horizontal (UL-142, UL-2085)	Steel	Diesel	956
Tank AST-WO	Maintenance Garage	AST vertical	Steel	Waste Oil	500
Portable Steel Drums (13 @ 55-gallons each)	Maintenance Garage	AST Steel Drums	Steel	Motor Oils	715
Portable Steel Drums (7 @ 55-gallons each)	Storage Shed	AST Steel Drums	Steel	Motor Oils	385
Tank UST-OWS	Maintenance garage Premises	UST horizontal Oil Water Separator	Steel	Vehicle Wash Wastewater	1, 000
Tank UST-G	Fuel Dispensing Area	UST	Fiberglass	Gasoline	10,000
Tank UST-D	Fuel Dispensing Area	UST	Fiberglass	Diesel	10,000
Total Aboveground Storage Capacity					2,556
Total Underground Storage Capacity					21,000
Facility Total Oil Storage Capacity					23,556

## **2.3 Evaluation of Discharge Potential**

### **2.3.1 Topography and Hydrogeologic Features**

Based on interpretation of the U.S.G.S. Topographic Map (Williamstown, New Jersey Quadrangle, 1982), the Site elevation is approximately 135 feet above mean sea level (msl). The Site topography slopes gently to the south-southeast.

The Site is located within the Coastal Plain physiographic province of New Jersey and is underlain by the Cohansey Formation (Tch). This formation is described as light colored quartz sand containing minor amounts of pebbly sand, fine to coarse-grained sand, silty and clayey sand, and interbedded clay. Available information from the U.S Department of Agriculture (USDA) under the Soil Survey Geographic Database program (SSURGO) indicates the Site primarily contains Downer loamy sand (DocB); the southern portion of the Site also contains Woodstown and Galloway loamy sands (WOUB).

The Site is underlain by the Kirkwood-Cohansey (kcas) aquifer system, a regionally important groundwater resource. Predominantly a water-table aquifer, the Kirkwood-Cohansey aquifer system is designated as a Class I-PL aquifer (Protection Area) in the vicinity of the Site. The primary designated use of Class I-PL aquifers is the preservation of Pinelands plant and animal species and their habitats through the protection and maintenance of the essential characteristics of Pinelands groundwater quality. Secondary uses include potable and agricultural water. Depth to groundwater is approximately 16.5 feet below ground surface (bgs); flow direction is suspected to be generally to the south-southeast.

### **2.3.2 Proximity to Navigable Waters**

No naturally occurring water bodies are present at the site. An unnamed tributary to Pump Branch traverses the southeast portion of the Site. Stormwater either infiltrates on-site soils or drains to the tributary stream and associated wetlands at the Site via overland sheet flow and stormwater outlet. Pump Branch is located approximately 3,000 feet northeast of the Site.

The site plan in Figure A-1 in Appendix A shows the location of the facility relative to the nearby waterways. The facility diagram included in Figure A-2 in Appendix A indicates the general direction of drainage. In the event of a large-volume uncontrolled discharge from the storage tanks, petroleum products will follow the natural topography of the site to be intercepted by the stormwater catch basins and finally discharged into the adjacent wetland and flows through the unnamed tributary to Pump Branch.

### **2.3.3 Discharge History**

There was no historical discharge of petroleum products from the site during the last 3 years.



## **PART 3: DISCHARGE PREVENTION – GENERAL SPCC PROVISIONS**

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

### **3.1 Discharge Prevention**

#### **3.1.1 Compliance with Applicable Requirements [40 CFR 112.7(a)(2)]**

All aboveground storage tanks at the site are of double-wall construction equipped with overflow alarms. Active spill control measures by utilizing sorption materials and booms will be utilized in transfer areas in case of accidental spills.

All aboveground tanks are installed elevated off the ground. These tanks are inspected regularly and following a regular schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. Any leakage from the primary container would be detected through manual gauging of the interstitial space. Any leakage from the secondary shell would be detected visually during scheduled visual inspections by facility personnel.

#### **3.1.2 Spill Prevention Practices [112.7(a)(3) & 112.8]**

WTPWD employees are trained (Section 3.6 and Appendix E) to implement spill prevention practices for work with and around oil sources. WTPWD personnel shall 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:

- Use pads, drip pans, and funnels when transferring petroleum products from a portable container;
- Protect oil sources from damage by moving equipment;
- Do not store oil sources near catch basins or floor drains; and
- Fuel transfer operations 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 storage tanks. Vehicle filling is the responsibility of the authorized users (Township employees). WTPWD implements spill prevention measures for vehicle filling and tank truck unloading operations. Detail procedure of fuel transfer operations is contained in Appendix C.

#### **3.1.3 Supplier Approval**

All suppliers must meet the minimum requirements and regulations for tank truck unloading as established by the United States Department of Transportation. WTPWD will also ensure that

all suppliers 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.

#### **3.1.4 Observation of Deliveries**

The Facility Manager or designee will supervise deliveries for all new suppliers and will periodically observe deliveries for existing, approved suppliers. Delivery observations include:

- Vehicle inspection prior to delivery and departure (e.g., to make sure the driver does not drive away with the hose in the fill pipe);
- Inquiry to ensure the truck contains the right product for the tank;
- Assurance that the tank can hold what the supplier intends to deliver; and
- Adequate spill response equipment is on board the vehicle.

#### **3.1.5 Vehicle Filling (Dispensing)**

Vehicle filling operations will be performed by authorized Township employees under the following guidelines:

- Facility personnel will monitor the fueling area for safe and proper operation, and will take immediate action to correct any deficiencies.
- Operating instructions are posted for self-service users.
- For unattended operation (no facility employee on-site), emergency instructions are also posted; and an emergency stop pushbutton, a manual activation method for the fire extinguisher system and a direct means of emergency communications are available.

#### **3.1.6 Draining Stormwater from Sumps**

Piping transitions and dispenser sumps are evacuated only under the direct supervision of the facility personnel.

- Accumulated stormwater, if any, is inspected for sheen and pumped out to discharge into the oil/water separator and/or taken offsite for proper disposal. Accumulated oil within the Oil Water Separator is vacuumed out periodically for offsite disposal in regulated treatment facilities. The effluent of oil/water separator is released into the sanitary sewer.
- If sheen is detected in the accumulated stormwater inside the sumps, the facility manger will initiate an investigation to detect the source of oil in the accumulated stormwater and corrective measures will be implemented. If a leak is detected, the facility manager will implement the Discharge Discovery and Reporting protocol as described in Section 5 of this SPCC plan.

### **3.2 Spill Reporting [40 CFR 112.7(a)(4)]**

The discharge notification form included in Appendix G will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

### **3.3 Potential Discharge Volumes and Direction of Flow [40 CFR 112.7(b)]**

Appropriate secondary containment and/or diversionary structures or equipment is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.

Table 3-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

**Table 3-1: Potential Discharge Volume and Direction of Flow**

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
<b>Bulk Storage Containers and Mobile/Portable Containers</b>				
<i>Emergency Generator Diesel Tank (AST-D)</i>				
Failure of aboveground tank (collapse of primary inner tank or catastrophic breach of inner tank and outer shell )	956	Gradual to instantaneous	East	Double-wall steel tank, redundant overfill protection including manual liquid level gauges, audible high-level alarm, and automatic high liquid level shutoff device.
Tank overfill	1 to 120	60 gal/min	East	Gravel Bed- not a conduit to surface water
<i>Maintenance Garage Waste Oil Tank (AST-WO)</i>				
Failure of aboveground tank (collapse of primary inner tank or catastrophic breach of inner tank and outer shell )	500	Gradual to instantaneous	East	Double-wall steel tank, overfill protection through manual liquid level gauging and audible high-level alarm. Tank is filled manually.
Tank overfill	1 to 55	10 gal/min	East	Concrete dike with normally closed manual drain valve. Tank is manually filled.
<i>Maintenance Garage (Portable Steel Drums Rack with 13 drums)</i>				
Complete failure of the largest drum	55 gallons	Gradual to Instantaneous	Floor drain to Oil Water Separator	Spill containment pallet as secondary containment
<i>Storage Shed ( 7 Portable 55-Gallon Drums)</i>				
Complete failure of the largest drum	55 gallons	Gradual to Instantaneous	East	Spill containment pallet as secondary containment

**Table 3-1: Potential Discharge Volume and Direction of Flow (continued)**

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
<b>Tank Truck Transfer Areas</b>				
Tank truck / hose leak during transfer to AST-D	1 to 120	60 gal/min	East	Land-based spill response capability (spill kit) and oil/water separator
Tank truck / hose leak during transfer to UST-G, UST-D	1 to 120	60 gal/min	East	Land-based spill response capability (spill kit) and oil/water separator
<b>Fuel Dispensing Areas</b>				
Gasoline and diesel dispenser hose/ connections leak (Fuel Dispensing Area)	1 to 150	60 gal/minute	East	Land-based spill response capability (spill kit) and oil/water separator
<b>Waste Oil Transfer Areas: Maintenance Garage</b>				
Used waste oil collected in 55-gallon drums and manually transferred into waste oil storage tank	1 to 55	10 gal/min	Floor drain to Oil Water Separator	Spill containment pallet as secondary containment
<b>Other Areas</b>				
Leak during transfer of oil from Oil Water Separator (UST-OWS)	1 to 120	60 gal/min	East	Land-based spill response capability (spill kit)
Leaking fuel dispensing pipes	1 to 300	10 gal/min	East	Land-based spill response capability (spill kit)
Emergency Generator	Leaking pipe or valve	25 or less (typical)	East	Gravel Bed- not a conduit to surface water. Tank is manually filled
Maintenance Building	Leaking pipe or valve	25 or less (typical)	Floor drain to Oil Water Separator	Spill containment pallet as secondary containment

### 3.4 Containment and Diversionary Structures [40 CFR 112.7(c)]

Methods of secondary containment at this facility include a combination of structures (e.g., built-in secondary containment), drainage systems (e.g., curbing and oil/water separators), and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters:

#### **Bulk storage containers (refer to Section 2 of this Plan):**

- **Double-Wall Tank Construction.** All aboveground and underground storage tanks, oil water separators, and underground pipes are constructed of double-wall configurations to provide secondary containment in case of leakage through the inner walls of the primary tanks.
- **Continuous Monitoring.** All annular spaces are continuously monitored for leaks and/or the presence of petroleum hydrocarbons through the regulatory approved Veeder Root monitoring systems with automatic alarm and dial out notification capability.

#### **Aboveground and Underground Piping System:**

- All buried fuel-piping systems at this facility are constructed of double-wall Reinforced Fiberglass pipes. The pipe annular spaces are continuously monitored at the fuel dispensing facility. The double-wall buried pipes in fully equipped for regular vacuum test. The aboveground pipes in fuel dispensing area are constructed of steel and painted white. When a section of buried line is exposed, it is carefully examined for deterioration. If any damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, WTPWD conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years. All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

#### **In transfer areas and other parts of the facility where a discharge could occur:**

- **Sorbent Materials.** Spill cleanup kits that include absorbent materials, booms, and other discharge response materials are stored in a weatherproof container next to the fuel transferring area. Spill kit is sufficient to contain small discharges (up to approximately 50 gallons) prior to its entry into the storm drainage system.
- **Drainage System.** Drainage from the entire developed area of the site is collected through a site-wide storm sewer system and discharges into the adjacent wetland. Any large volume catastrophic uncontrolled spill from a

refueling fuel truck, above ground piping system, and/or vehicle fuel dispensing operations will eventually be intercepted at the wetland.

- **Secondary Containment Barriers/Booms/Curbs.** The maximum amount of oil discharged due to a complete failure of a single compartment of tanker truck is 2000 gallons. A catastrophic spill of this volume will be primarily contained by deploying sorbent material and other portable spill barriers to be deployed prior to initiating the transfer operation.

### **3.5 Inspections, Tests, and Records [112.7(e), 112.8(d)]**

This Plan outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Records of inspections performed as described in this Plan and signed by the appropriate supervisor are a part of this Plan, and are maintained with this Plan at the Public Works Department office for a minimum of three years. The reports include a description of the inspection procedure, the date of inspection, whether any minor / major repair and/or maintenance work was required, and the inspector's signature.

The program established in this SPCC Plan for regular inspection of all oil storage tanks, day tank, oil water separators, and related transfer equipment and pipelines in accordance with manufacturers' guidelines. Each container is inspected in accordance with the approved inspection and testing program by field operation personnel as described in this Plan section and following the checklist provided in Appendix D of this SPCC Plan. The monthly inspection is aimed at identifying signs of deterioration and maintenance needs, including the foundation and support of each container. Any leak from tank penetrations and piping systems is promptly corrected.

This Plan also describes provisions for monitoring the integrity of the piping systems through a combination of monthly visual inspections and periodic vacuum testing or using an alternate technology. When a section of buried line is exposed, it is carefully examined for deterioration. If any damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, WTPWD conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years. All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are visually inspected during the monthly inspection of the facility.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

The inspection program is comprised of informal daily examinations, weekly, monthly, and annual scheduled inspections, and periodic condition inspections. Additional inspections and/or examinations are performed whenever an operation alert or malfunction of leak detection system is reported following a scheduled examination. Written examination/inspection procedures and monthly examination/inspection reports are signed by the field inspector and are maintained at the field office for a period of at least three years.

Table 3-2 summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility.

### **3.5.1 Daily and Weekly Examinations**

The facility installations are inspected daily by field operations personnel. The daily visual examination consists of a walkthrough of the storage tank areas. Field operations personnel make visual inspection of the tanks and piping systems for any discoloration or stains. They examine the daily printout of the Veeder Root control units to monitor the status of all monitoring devices. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored soil, etc. are logged and communicated to the WTPWD Field Operations Manager.

The weekly inspection checklist is included in Appendix D.

### **3.5.2 Monthly Inspections**

Table 3-4 summarizes the scope of monthly inspections performed by field personnel. The monthly inspection covers the storage tanks, oil water separators, and pumps. It also includes verifying the proper functioning of all monitoring devices including probes and sensors on oil storage tanks and piping systems. Storage tanks are inspected for signs of deterioration, leaks, or accumulation of oil/water inside the spill containment sumps, or other signs that maintenance or repairs are needed. The monthly inspection also involves visually inspecting all aboveground valves and pipelines and noting the general condition of items such as transfer hoses, flange joints, expansion joints, valves, catch pans, pipeline supports, sumps, manual level gauges, manual and solenoid valves, and metal surfaces.

The checklist provided in Appendix D is used during monthly inspections. These inspections are performed in accordance with the engineering specifications and maintenance schedule developed by the equipment manufacturers.



**Table 3-2: Inspection and Testing Program**

<b>Facility Component</b>	<b>Action</b>	<b>Frequency/Circumstances</b>
Aboveground Storage Tanks	Test container integrity as per manufacturer's guidelines. Combine visual inspection with another testing technique (non-destructive shell testing). Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (daily, weekly, monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Tank supports and foundation	Inspect tank's supports and foundations.	Following a regular schedule (daily, weekly, monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid level sensing devices (overfill)	Test for proper operation.	Monthly
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly
Underground Storage Tanks	Tightness / Leak Test	Annually
Buried Pipes	Inspect for deterioration.  Integrity and leak testing.	Whenever a section of buried line is exposed for any reason.  At the time of installation, modification, construction, relocation, or replacement. Post-construction annual leak test by certified inspector.

**Table 3-3: Scope of Daily Examinations**

<b>Facility Area</b>	<b>Item</b>	<b>Observations</b>
Storage Tanks and Fuel Dispensing Facility	Leaks	Drip marks, leaks from tank walls, pumps, filters, hoses, nozzles, pipe joints
	Corrosion	Check nipples, spill containment and manholes for paint decay. Check piping and fitting for rust, readability of signs and decals.
	Operation	Check pump meters and reset buttons, fuel gauges for proper operation Spill containment for debris
	Foundation and Structures	Excessive soil or vegetation buildup against base of the tanks. Small cracks in concrete Puddles containing spilled or leaked material Settling
Oil Water Separators	Leaks, oil levels	Evidence of leaks.
Veeder Root Monitoring Units	Daily Status Reports	Examine the daily status reports printed by the Veeder Root TLS Control Box. In particular, check the 24-hour Inventory Reconciliation report and indication of leak in interstitial spaces.

**Table 3-4: Scope of Monthly Inspections**

Facility Area	Equipment	Inspection Item
Fuel dispensing area	Pumps, Nozzles, Hoses	<ul style="list-style-type: none"> <li>• Leakage from fuel dispersing systems</li> <li>• Nozzles, hoses and fittings for wear and tear</li> <li>• Pump drip pans and sumps (sign of oil or standing water)</li> <li>• Pump motors for over- heating wear &amp; tear</li> </ul>
Emergency Generator area	AST-D, Secondary Containment, Valves	<ul style="list-style-type: none"> <li>• Tank liquid levels checked</li> <li>• Monitoring devices</li> <li>• Vent pipes and caps</li> <li>• Secondary containment of the AST-D</li> <li>• Overfill protection system</li> <li>• Corrosion, paint condition</li> <li>• Grounding wires</li> </ul>
Drum Storage Areas- Maintenance Building and Storage Shade	Drum storage racks, chemicals and lube oils	<ul style="list-style-type: none"> <li>• Storage conditions, sign of spill, leakages</li> </ul>
Waste-Oil Storage Tank- Maintenance Building	AST-WO, Secondary Containment, Valves, Sensors	<ul style="list-style-type: none"> <li>• Tank liquid levels checked</li> <li>• Monitoring devices</li> <li>• Vent pipes and caps</li> <li>• Secondary containment of the AST-WO</li> <li>• Overfill protection alarm</li> <li>• Corrosion, paint condition</li> <li>• Grounding wires</li> <li>• Waste-oil transfer pump</li> </ul>

### 3.5.3 Semi-Annual and Annual Inspections

All safety devices are tested annually by a third party inspector. The tests are recorded and the results are maintained with this Plan at WTPWD's office. Testing of the safety devices is conducted in accordance with the instructions from the device's manufacturer. Written test procedures are kept at the offices of the third party testing company and are available upon request.

Twice a year, facility personnel walk to the pre-established response staging areas located around the parking lots to ensure that the adjacent wetland area is accessible using field equipment and that the oil spill cleanup program can be implemented in the event of a catastrophic uncontrolled discharge from the storage tanks and piping systems reaching the wetland area.

### 3.5.4 Periodic Condition Inspection

A condition inspection of storage tanks is performed by a qualified inspector in accordance with the manufacturers' guidelines. All underground piping and associated leak detection systems will be inspected annually by a New Jersey Certified Underground Storage Tank Installer or inspector, in accordance with the applicable State of New Jersey requirements.

- Replace the dispenser filter at least every six (6) months or as needed.
- Check fuel for bacterial infestation or microbial growth
- Have a qualified person periodically check the electric wiring
- Check the emergency relief vent at least once a year by lifting the top cap and releasing it to ensure freedom of movement
- At least once a year, remove the leak detection devices and check for proper operation
- At least once a year, check the calibration of the fuel gauge
- Follow the pump manufacturer's recommendation for frequency and procedures of maintenance
- Document significant storage events per 40 CFR 112 and state regulations
- Manually check the oil level in oil water separator with gauge sticks. Remove the oil if oil/water interface levels are below that shown on the chart:

Tank	Oil/water interface Pump-Out Level (Measured from bottom of OWS)
Tank UST-OWS	88"

- Check the bottom sludge buildup. Remove the sludge when the bottom sludge exceeds 12" deep.
- Check suspended sediment content in effluent water. High concentration of suspended sediment content is an indication of sludge build-up when the separator should be cleaned.
- Check the high oil alarm.

### **3.5.5 Periodic Integrity Testing**

In addition to the above monthly and annual inspections by facility personnel, Tanks # AST-D and AST-WO are periodically evaluated by an outside certified tank inspector following the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks*, SP-001, 2005 (or later) version, as described in Section 4.2.5 of this Plan.

### **3.5.6 Tank and Equipment Maintenance**

All petroleum tank and piping problems shall be immediately reported to the Facility Manager. Visible oil spills (leaks) that cause a loss of oil from tank walls, piping or other components shall be repaired or replaced as soon as possible to prevent the potential for a major spill from the source. This is especially important for sources located outside containment or near drains or catch basins that discharge to the environment.

## **3.6 Personnel, Training, and Discharge Prevention Procedures [112.7(f)]**

The Field Operations Manager has been designated as the point of contact for all oil discharge prevention and response at this facility.

The designated WTPWD field maintenance personnel who operate the listed regulated items included in this SPCC plan receive training on proper handling of oil products and procedures to respond to an oil discharge. The training ensures that all facility maintenance personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations. The training also covers risks associated with potential exposure to the petroleum products. The designated WTPWD field maintenance personnel also receive an initial 40-hour HAZWOPER training (and 8-hour annual refresher training) as per OSHA standard.

WTPWD ensures that all contractor personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this Plan prior to working at the facility. All contractors working at the facility receive a copy of this SPCC Plan.

WTPWD management holds briefings with field operations personnel (including contractor personnel as appropriate) at least once a year, as described below.

### **3.6.1 Spill Prevention Briefing**

The Field Operations Manager conducts Spill Prevention Briefings annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the company safety meetings. Sign-in sheets, which include the topics of discussion at each meeting, are maintained with this Plan at the office of WTPWD. A *Discharge Prevention Briefing* log form is provided in Appendix E to this Plan and is used to document the briefings. The scheduled annual briefing includes a review of WTPWD policies and procedures relating to spill prevention, control, cleanup, and reporting; procedures for routine handling of products (e.g., loading, unloading, transfers, burn-pit operation); SPCC inspections and spill prevention procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil and applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

The general outline of the briefings is as follows:

- Responsibilities of personnel and Designated Person Accountable for Spill Prevention;
- Spill prevention regulations and requirements;
- Spill prevention procedures;
- Spill reporting and cleanup procedures;
- History/cause of known spill events;
- Equipment failures and operational issues;
- Recently developed measures/procedures; and
- Proper equipment operation and maintenance.

### 3.6.2 Contractor Instructions

In order that there will be no misunderstanding on joint and respective duties and responsibilities to perform work in a safe manner, contractor personnel receive instructions on the procedures outlined in this SPCC Plan. The instructions cover the contractor activities such as servicing the oil water separator, emergency generator, fuel dispensing system, storage tanks, and associated ancillary equipment, such as pumps and monitoring system.

All contractual agreements between WTPWD and contractors specifically state:

***Personnel must, at all times, act in a manner to preserve life and property, and prevent pollution of the environment by proper use of the facility's prevention and containment systems to prevent hydrocarbon and hazardous material spills. No pollutant, regardless of the volume, is to be disposed of onto the ground or water, or allowed to drain into the ground or water. Federal regulations impose substantial fines and/or imprisonment for willful pollution of navigable waters. Failure to report accidental pollution at this facility, or elsewhere, can be cause for equally severe penalties to be imposed by federal regulations. To this end, all personnel must comply with every requirement of this SPCC Plan, as well as taking necessary actions to preserve life, and property, and to prevent pollution of the environment. It is the contractor's (or subcontractor's) responsibility to maintain his equipment in good working order and in compliance with this SPCC Plan. The contractor (or subcontractor) is also responsible for the familiarity and compliance of his personnel with this SPCC Plan. Contractor and subcontractor personnel must secure permission from WTPWD's Field Operations Manager before commencing any work on any facility. They must immediately advise the Field Operations Manager of any hazardous or abnormal condition so that the Field Operations Manager can take corrective measures.***

### **3.7 Security [112.7(g)]**

The southern part of the municipality complex containing all the aboveground and underground storage tanks, fuel dispensing facility, piping systems, and maintenance buildings are partially surrounded by 8-ft tall metal security fencing and restricted area signage. The site is accessible only through the two front entrances.

Area lights illuminate the fuel transfer and storage areas. Additional motion-activated and photoelectric lights are placed in the fuel dispensing and other areas of the facility. The lights are placed to allow for the discovery of discharges and to deter the acts of vandalism.

The electric starter controls for the oil pumps and fuel dispensers are located inside the buildings, which are locked when unattended.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Aboveground piping is located within areas that are not accessible to vehicular traffic. Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment and storage tank.

### **3.8 Conformance with Applicable State and Local Requirements [112.7(j)]**

The SPCC regulation at 40 CFR Part 112 is more stringent than requirements from the state of New Jersey for this type of facility. This SPCC Plan was written to conform with 40 CFR part 112 requirements. The facility thereby conforms to the general requirements for oil pollution facilities in New Jersey. All discharge notifications are made in compliance with local, state, and federal requirements.

## **PART 4: DISCHARGE PREVENTION – SPCC PROVISIONS**

### **4.1 Facility Drainage**

#### **4.1.1 Drainage from Diked Storage Areas [112.8(b)(1)]**

Aboveground storage tank AST-WO has a concrete dike in place surrounding the tank to capture and contain any spill that occurs.

#### **4.1.2 Valves Used on Diked Area Storage [112.8(b)(2)]**

The concrete dike surrounding AST-WO has a manual valve to control the discharge from the containment area. The area is checked routinely and after storm events for any sign of sheen or product in the captured stormwater. If product is present, the stormwater must be disposed of offsite. If product is not present, the stormwater is discharged through the valve.

#### **4.1.3 Drainage Systems from Undiked Areas [112.8(b)(3)]**

All above ground storage tanks used for storing petroleum products at the facility are constructed of shop-built double-wall configurations providing secondary containment. The underground buried pipes within the fuel dispensing facility areas are of double-wall configurations constructed of Reinforced Fiberglass materials. The vacuum spaces are subjected to periodic leak test monitoring program. The fuel dispensing area double-wall underground pipes are subjected to continuous monitoring through vacuum sensors integrated with the Vedeer Root control system.

Any undetected significant uncontrolled leaks from the fuel dispensing area will reach the adjacent wetland. Uncontrolled leaks from the storage drums and waste oil transferring system within the maintenance building will be intercepted by the floor-drains and contained inside the underground oil water separator.

### **4.2 Bulk Storage Containers [40 CFR 112.8(c)]**

Table 4-1 summarizes the construction, volume, and content of bulk storage containers at WTPW



**Table 4-1: List of Oil Containers and Secondary Containments**

ID	Location	Type	Construction	Primary Content	Capacity (gallons)	Discharge Prevention & Containment
AST-D	Emergency Generator area	AST horizontal (UL-142, UCL-S601-07) Fuel Tank	Steel	Diesel	956	Double-wall steel; continuous interstitial monitoring; and overfill protection including manual & electronic liquid level gauges, audible high-level alarm, and automatic high liquid level shutoff device.
AST-WO	PWD Maintenance building	AST horizontal (UL-142, UL-2085)	Steel	Waste Oils	500	Double-wall steel; and overfill protection including manual & electronic liquid level gauges, and audible high-level alarm.
Drum Rack	PWD Maintenance building	55-gallon drums	Steel	Motor Oils	10 x 55 = 550 gallons	Secondary spill containment pallet. Floor drains connected to underground oil water separator
Portable Drums-Maintenance Building	PWD Maintenance building	55-gallon drums	Steel	Motor Oils	3x55 = 165 gallons	Secondary spill containment pallet. Floor drains connected to underground oil water separator
Portable Drums-Storage shade	Storage Shade	55-gallon drums	Steel	Motor Oils	7x55 = 385 gallons	Secondary spill containment pallet. Floor drains connected to underground oil water separator
UST-D	Fuel Dispensing Facility	UST (UL-2085)	Reinforced Fiberglass	Diesel	10,000	Double-wall reinforced fiberglass; continuous interstitial monitoring; and overfill protection including manual & electronic liquid level gauges, audible high-level alarm, and automatic high liquid level shutoff device.

UST-G	Fuel Dispensing Facility	UST (UL-2085)	Reinforced Fiberglass	Gasoline	10,000	Double-wall reinforced fiberglass; continuous interstitial monitoring; and overfill protection including manual & electronic liquid level gauges, audible high-level alarm, and automatic high liquid level shutoff device.
UST-OWS	Maintenance Building Premises	UST horizontal (Sti-P3, UL-58, UL-1746)	Steel with Cathodic protection coating	Waste Oils and vehicle wash wastewater	1,000	Single-wall steel with cathodic protection coating; multi-float liquid level gauge, high oil level audible alarm
				TOTAL	23,556	

#### 4.2.1 Construction [40 CFR 112.8 (c)(1)]

All USTs and ASTs except Oil Water Separators used for oil storage at this facility are constructed of steel and/or reinforced fiberglass plastic materials, in accordance with industry specifications. The design and construction of all bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

All aboveground piping systems in fuel dispensing area are constructed of steel, installed with appropriate supports. All buried fuel piping systems at this facility are constructed of double-wall Reinforced Fiberglass pipes. The pipe annular spaces are continuously monitored at the fuel dispensing facility. When a section of buried line is exposed, it is carefully examined for deterioration. If any damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, WTPWD conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years. All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Most of the aboveground piping is located within areas that are not accessible to vehicular traffic. Brightly painted bollards are placed where needed to prevent vehicular collisions with storage tanks and equipment.

#### 4.2.2 Secondary Containment [40 CFR 112.8(c)(2)]

The secondary containment requirements for all aboveground and underground storage tanks at the site are provided through shop-built double-wall construction and on-site monitoring devices. All underground storage tanks are equipped with continuous interstitial monitoring

devices. All storage tanks have overflow protection through liquid level gauges, and high liquid level alarm as described in Table 4.1.

The double-wall construction provides intrinsic secondary containment for the entire tank capacity. Since the secondary containment is not open to precipitation this volume is sufficient to fully contain the product in the event of a leak from the primary container. The interstitial spaces between the primary and secondary containers are inspected on a monthly basis to detect any leak of product from the primary container.

The 55-gallon drums are placed on spill pallets inside the maintenance buildings. Each spill pallet provides 10% of leakage from three (3) drums of containment capacity, which is more than the required 55 gallons for any single drum since the drums are not exposed to precipitation. The floors of the maintenance buildings are impervious and sloped to direct any discharge occurring in the building away from doorways and towards the drainage system that leads to the facility oil/water separator.

#### **4.2.3 Corrosion Protection [40 CFR 112.8(c)(4)]**

The metallic underground storage tank is Sti-P3 model with corrosion resistant coating and built in cathodic protection. Pressure testing is performed on the UST every two years following the requirements of 40 CFR Part 280. Records of pressure tests are kept for at least three years.

#### **4.2.4 Inspections and Tests [40 CFR 112.8(c)(6)]**

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in STI Standard SP-001. Records of certified tank inspections are kept at the facility for at least three years.

Table 4-2 summarizes inspections and tests performed on bulk storage containers ("EE" indicates that an environmentally equivalent measure is implemented in place of the inspection/test, as discussed in Section 3.1 of this Plan).

#### **4.2.5 Heating Coils [40 CFR 112.8(c)(7)]**

This section is not applicable to the facility since there are no regulatory exhaust-lines from internal heating coils.

#### **4.2.6 Overflow Prevention Systems [40 CFR 112.8(c)(8)]**

All tanks are equipped with a visible direct-reading level gauge. The regulated USTs are equipped with liquid level gauges and overflow protection systems.

All liquid level sensing devices in ASTs and UST are tested on a monthly basis during the monthly inspection of the facility, following manufacturer recommendations. Venting capacity of all tanks is suitable for the fill and withdrawal rates.

If needed, storage drums are refilled manually and therefore overfill prevention systems do not apply.

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

**Table 4-2: Scope and Frequency of Bulk Storage Containers Inspections and Tests**

Inspection/Test	Buried Pipes	Tanks AST-D AST-WO	Tanks UST-D, UST-G	Tank UST-OWS	Drums
Inspection by facility personnel (as per checklist of Appendix D)	M A	D, W, M, A	D, W, M, A	D, W, M, A	D, W, M, A
External inspection by certified inspector (as per STI Standard SP-001)	N/A	20 yr	N/A	N/A	EE
Internal inspection by certified inspector (as per STI Standard SP-001)	N/A	20 yr†	10 yr#	10 yr#	EE
Tightness / Leak / Interstitial Space test meeting requirements of 40 CFR 280 by NJDEP certified inspector	1 yr	N/A	1 yr	N/A	N/A

Legend:

- D: Daily
- W: Weekly
- M: Monthly
- A: Annual
- N/A: Not Applicable
- EE: Inspection not required given use of environmentally equivalent measure (refer to Section 3.1 of this Plan).
- † Internal inspection may be recommended by the certified inspector based on findings from the external inspection.
- # 10 years after installation and every 5 years thereafter

The frequency above is based on implementation of a scheduled inspection/testing program. To initiate the program, ASTs will be inspected by a certified professional the following dates:

< Tank #AST-D & AST-WO: external inspection to be performed by certified professional.

#### **4.2.7 Effluent Treatment Facilities [40 CFR 112.8(c)(9)]**

This section is not applicable to the facility since there are no regulated effluent treatment areas.

#### **4.2.8 Visible Discharges [40 CFR 112.8(c)(10)]**

Visible discharges from any container or appurtenance – including gaskets, piping, pumps, and valves – are quickly corrected upon discovery.

Oil is promptly removed from the sumps and/or spill area and disposed of according to the waste disposal method described in Part 5 of this Plan.

#### **4.2.9 Mobile and Portable Containers [40 CFR 112.8(c)(11)]**

Small portable oil storage containers, such as 55-gallon drums, are stored inside the maintenance building and storage shade where secondary containment is provided by, secondary containment berms, spill pallets and floor drains leading to the Oil Water Separator. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products. Effluents of oil water separators are discharged into the sanitary sewers.

### **4.3 Transfer Operations, Pumping, and In-Plant Processes [40 CFR 112.8(d)]**

Petroleum product handling and transfer operations at this facility include:

1. Transfer of petroleum products from licensed tanker trucks into aboveground storage tank (Tank AST-D) and underground storage tanks (UST-D, UST-G) in accordance with all applicable rules and regulations. The largest compartment of oil trucks visiting the facility has a total capacity of less than 3000 gallons. Oil trucks are brought to the facility only to fill the storage tanks and do not remain at the facility. All transfer operations are attended by the truckers and by field operations personnel and meet the minimum requirements of the U.S. Department of Transportation Hazardous Materials Regulations. Appendix C summarizes the loading/unloading procedure at this facility.
2. The transfer of motor oils and/or waste oils from motor vehicles into the portable 55-gallon drums. The collected waste oils are then transferred manually into the aboveground waste oil storage tank AST-WO. Any spill is contained within the spill pallet. Any uncontrolled spill is intercepted by floor drains and discharged into the oil water separator.
3. The transfer of oil from the portable 55-gallon drums into the motor vehicles. The motor oil is pumped from the drums using manually operated pumps. Any spill is contained within the spill pallet. Any uncontrolled spill is intercepted by floor drains and discharged into the oil water separator.
4. Transfer of gasoline and diesel fuel from the underground storage tanks (Tanks USTG and UST-D) to the authorized employee vehicles at the fuel dispensing facility.

5. Transfer of accumulated oils from Oil Water Separator (Tank UST-OWS) into vacuum truck for offsite disposal. Effluent from the OWS is discharged into the sanitary sewer by gravity flow.

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are visually inspected during the monthly inspection of the facility.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valves, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Aboveground piping is located within areas that are not accessible to vehicular traffic. Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

## **PART 5: SPILL RESPONSE AND REPORTING**

### **[40 CFR 112.4 and 112.7]**

#### **5.1 Spill Response [112.7(a) (3) (iv), 112.7(a) (4), and 112.7 (a) (5)]**

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product. Several individuals and organizations must be contacted in the event of an oil discharge.

The Field Operations Manager is responsible for ensuring that all required discharge notifications have been made. All discharges should be reported to the Field Operations Manager. The summary table included in Appendix H to this SPCC Plan provides a list of agencies to be contacted under different circumstances. Discharges would typically be discovered during the inspections conducted at the facility in accordance with procedures set forth in Section 3.5 of this SPCC Plan, Tables 3-2 through 3-4, and on the checklists of Appendix D. The Form included in Appendix H of this Plan summarizes the information that must be provided when reporting a discharge, including contact lists and phone numbers.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- Contact the Facility Manager or his/her alternate;
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

A list of Emergency Contacts is provided in Appendix G. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix J.

For establishing appropriate response procedures, this SPCC Plan classifies any discharge as either "minor" or "major," depending on the volume and characteristics of the material released.

##### **5.1.1 Minor Spill Response [112.7(a)(3)(iv)]**

A "Minor Spill Response" is defined as one that poses no significant harm to human health or the environment. These spills involve generally less than 5 gallons and can usually be cleaned up by WTPWD personnel. Other characteristics of a minor spill include the following:

- the spilled material is easily stopped or controlled at the time of the spill;
- the spill is localized;
- the spilled material is not likely to reach surface water or groundwater;

- there is little danger to human health; and
- there is little danger of fire or explosion.

In the event of a minor spill, the following guidelines shall apply:

- Stop the source if the spill is ongoing.
- Immediately notify the senior on-site person (i.e., Facility Manager).
- Call the NJDEP hotline (1-877-927-6337)
- Under the direction of a senior on-site person, contain the spill with spill response materials and equipment.
- Place spill debris in properly labeled waste containers.
- Complete the *Spill Notification Form* (Appendix H) and send to the appropriate Environmental Compliance Officer(s) in accordance with the Appendix H guidelines table.

### **5.1.2 Major Spill Response (Spill Emergency) [112.7(a)(3)(iv)]**

A “Spill Emergency” is defined as one involving a spill that cannot be safely controlled or cleaned up. Characteristics include the following:

- the spill is large enough to spread beyond the immediate spill area;
- the spilled material enters surface water or groundwater (regardless of spill size);
- the spill requires special training and equipment to cleanup;
- the spilled material is dangerous to human health; and/or
- there is a danger of fire or explosion.

In the event of a spill emergency, the following guidelines shall apply:

- Stop the source if the spill is ongoing only if safe to do so.
- All workers shall immediately evacuate the spill site and move to a safe distance away from the spill.
- A senior on-site person shall call for medical assistance if workers are injured (no worker shall engage in rescue operations unless they have been properly trained and equipped).
- A senior on-site person shall immediately contact the NJDEP hotline (1-877-927-6337) and the National Response Center (1-800-424-8802). Document the telephone calls on the *Spill Notification Form* in Appendix H.
- Notify the local Fire Department or Police Department (Call 911).
- A senior on-site person shall contact the Facility Manager and provide details regarding the spill.
- The Facility Manager or Environmental Compliance Officer will coordinate cleanup and seek assistance from a cleanup contractor as necessary.

If a senior on-site person is not available at the time of the spill, then the next highest WTPWD employee in command shall assume responsibility. Should a discharge reach the wetland, physical response and countermeasures may include but not limited to the following activities:

- Installation of hard boom and sorbent boom to contain the free products



- Use of sorbent pads to clean the wetland area edges and stones soaked with petroleum products.
- Use of vacuum trucks to recover free product and oily water from the wetland, if any.
- Floating / sorbent booms are deployed within and upstream of the wetland areas. In the event of a catastrophic uncontrolled spill, the booms will create a temporary storage of more than 956 gallons (largest AST size) petroleum products within the upstream of the wetland outfall. Vacuum trucks will then be utilized to remove free product and oily water at the entrance of the wetland.
- Crews should remove oiled vegetation and debris from the wetland areas and place them in bags for later disposal.
- The wetland banks should be flushed with water to remove free oil and help it flow down to the nearest depression and other access points where it can be recovered by vacuum truck.
- *At no time shall any surfactants, dispersants, or other chemicals be used to remove oil from the wetland areas.*

## **5.2 Waste Disposal [112.7(a)(3)(v)]**

Non-hazardous wastes resulting from a minor spill response will be containerized in impervious bags, drums or buckets. Unsaturated oil spill clean up debris will be disposed of as special waste by a licensed waste hauler within two weeks. Any saturated oil spill clean up debris or recovered free product will be stored in drums for offsite disposed.

Wastes resulting from a major spill response will be removed and disposed by a cleanup contractor.

The cleanup contractor will handle the disposal of any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemicals collected during a response to a discharge incident.

If the facility responds to a discharge without involvement of a cleanup contractor, WTPWD will contract a licensed transportation/disposal company to dispose of waste according to regulatory requirements. The Field Operations Manager will characterize the waste and arrange for the use of certified waste containers.

All facility personnel handling hazardous wastes must have received both the initial 40-hour and annual 8-hour refresher training in the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) of the Occupational Health and Safety Administration (OSHA). This training is included as part of the initial training received by all field personnel. Training records and certificates are kept at the field office.

## **5.3 Notification and Reporting [112.4 and 112.7(a)(4)]**

Any unauthorized discharge into air, land or water must be reported immediately (within 15 minutes of discovering the discharge) to the New Jersey Department of Environmental Protection (NJDEP) at (877) WARN DEP (927-6337). In the event this number is inoperable, the responsible person in charge shall immediately notify the State Police at (609) 882-2000.

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

For any discharge reported verbally, a written notification must also be sent to the NJDEP and to the Winslow Township Department of Health, both within five (5) days of the qualifying discharge.

The *Spill Notification Form* includes a checklist to document the proper notification of state and federal agencies. The form shall be filed by facility name and maintained as long as WTPWD owns and/or operates this facility. A summary sheet is included in Appendix I to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the loading rack/unloading area).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator (Region II) and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) *more than 1,000 gallons of oil in a single event*, or discharges (as defined in 40 CFR 112.1(b)) *more than 42 gallons of oil in each of two discharge incidents within a 12-month period*. The following information must be submitted to the EPA Regional Administrator (Region II) and to NJDEP within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;

- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator (Region II) and to NJDEP is included in Appendix K of this Plan.

## **5.4 Cleanup Contractors and Equipment Suppliers**

Contact information for specialized spill response and cleanup contractors are provided in Appendix H. These contractors have the necessary equipment to respond to a discharge of oil that may affect the Pump Creek shorelines and the adjacent wetlandmers.

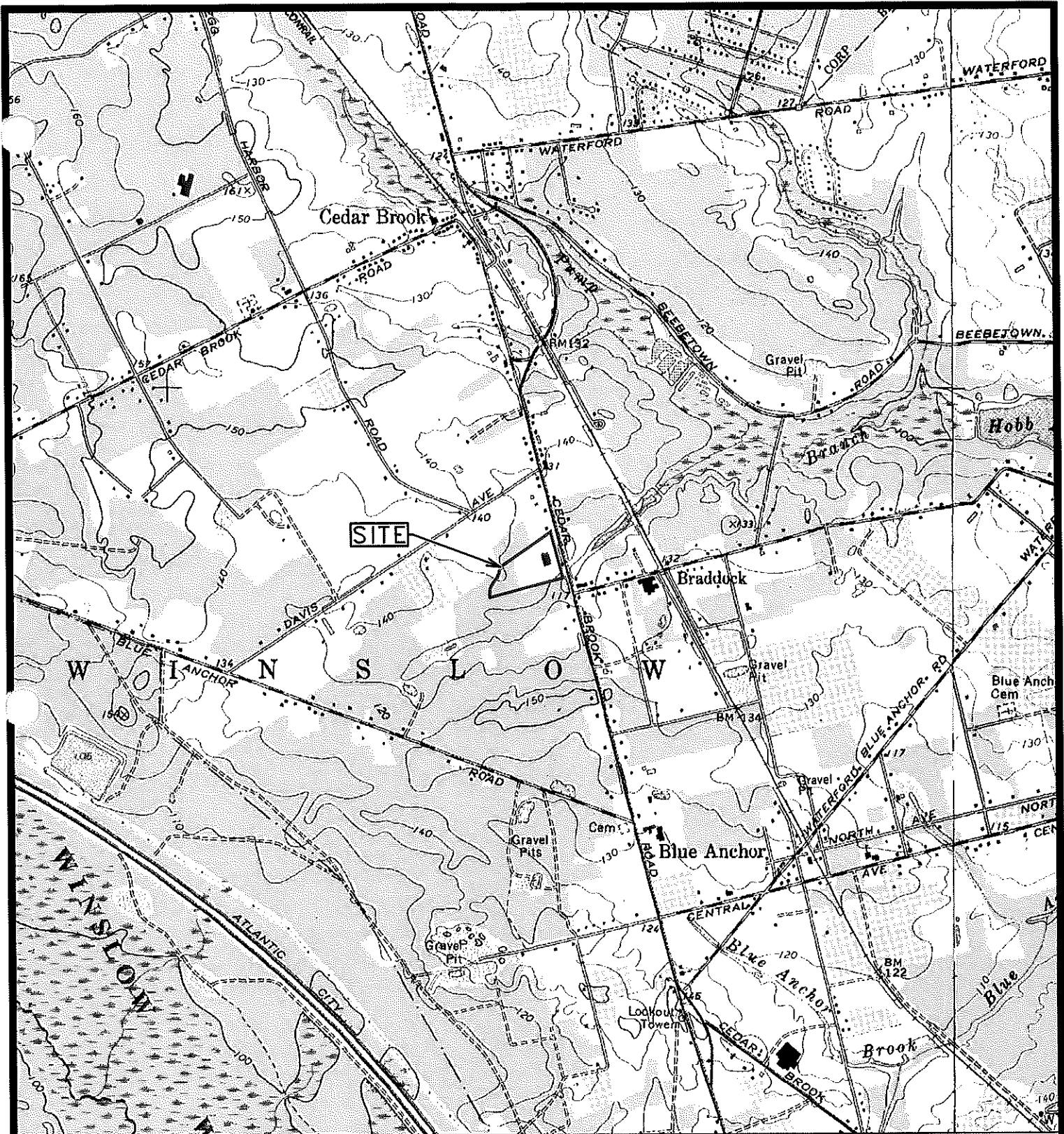
Spill kits are located at the loading / unloading area and inside the maintenance building. The inventory of response supplies and equipment is provided in Appendix J of this Plan. The inventory is verified on a monthly basis. Additional supplies and equipment may be ordered from the following sources:

AbsorbentsOnline.com.  
Interstate Products Inc.

(800) 869-9633  
(800) 474-7294

# APPENDIX A

## Site Plan and Facility Diagrams



PREPARED BY



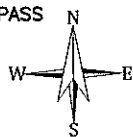
**CONSULTING AND MUNICIPAL ENGINEERS**

3759 U.S. Hwy 1 South - Suite 100, Monmouth Junction, NJ 08852  
 Phone: (732)951-2101 Fax: (732)951-2106

SCALE



COMPASS



**FIGURE A-1**  
**GENERAL LOCATION OF THE FACILITY ON USGS TOPOGRAPHIC MAP**  
**WINSLOW TOWNSHIP MUNICIPAL COMPLEX**  
 BLOCK 5801, LOTS 3 & 4  
 WINSLOW TOWNSHIP  
 CAMDEN COUNTY, NEW JERSEY

CLIENT **TOWNSHIP OF WINSLOW**  
 CAMDEN COUNTY  
 NEW JERSEY

SOURCE USGS COLOR TOPO 24K ([HTTP://GEODATA.STATE.NJ.US/](http://geodata.state.nj.us/))

PROJECT NO. IW00501.01	SCALE 1" = 2000'	DATE 2/24/2017
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## APPENDIX B

### Certification of Substantial Harm Determination

Facility Name: Winslow Township Public Works Department  
Facility Address: 125 South Route 73, Braddock, NJ 08037-9422

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

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 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 (as calculated using the appropriate formula) 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 (as calculated using the appropriate formula) such that a discharge from the facility would shut down a public drinking water intake?

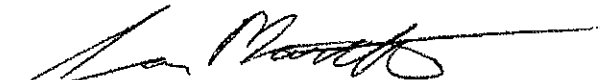
Yes  No

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 5 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.

  
Signature

Director of PWD/Facility Manager  
Title

Sam Martello  
Name (type or print)

Date 12/17/18

# APPENDIX C

## Fuel Transfer Procedures

### C.1 Loading/Unloading Procedures

Oil delivery contractors perform tank truck unloading. WTPWD requires these contractors to conduct unloading procedures in accordance with the requirements and regulations established by the Department of Transportation. WTPWD ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. As a condition of their contract with WTPWD, each contractor must have a tanker truck spill response plan and must submit this plan to WTPWD for review. Truck drivers are trained to implement appropriate safety measures and spill prevention procedures prior to, during, and following fuel unloading activities. Drivers also receive training related to spill response and notification procedures. A supply of absorbent materials is maintained on every tanker truck. Prior to the transfer operation, the driver must check the on-site spill response materials and supplies as well.

The Facility Manager or his/her designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers. All loading and unloading of tanks take place only in the designated loading /unloading areas. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in Exhibit C-1.

### C.2 Containment in Tank Truck Unloading Areas (UST-D & UST-G)

Tank truck unloading at this facility consists of bulk deliveries of gasoline into Tank UST-G and diesel into Tank UST-D. The truck will be parked at the designated area on the parking lot in front of the Maintenance Building. The stormwater inlet catch basin grate must be covered by the drain-cover mat available on-site. The curbing around the parking lot and portable berms will provide secondary containment of more than 3000 gallons in case of catastrophic uncontrolled spill.

### C.3 Containment in Tank Truck Unloading Areas (AST-D)

Tank truck unloading at this facility consists of bulk deliveries of diesel fuel to Tank AST-D. The truck will be parked at the designated area on the paved area near the AST. Secondary containment storage will be created by placing the portable berms spanning the concrete curbs. The curbing around the portable berms will provide secondary containment of more than 3000 gallons in case of catastrophic uncontrolled spill.

### Exhibit C-1: Fuel Transfer Procedures

Stage	Tasks
Prior to loading/unloading	<ul style="list-style-type: none"> <li>➤ Visually check all hoses for leaks and wet spots.</li> <li>➤ Verify that sufficient volume is available in the storage tank.</li> <li>➤ Prepare the secondary containment system as per Sections C.2 to C.4</li> <li>➤ Secure the tank vehicle with wheel chocks and interlocks.</li> <li>➤ Ensure that the vehicle's parking brakes are set.</li> <li>➤ Verify proper alignment of valves and proper functioning of the pumping system.</li> <li>➤ Establish adequate bonding/grounding prior to connecting to the fuel transfer point.</li> <li>➤ Turn off cell phone.</li> </ul>
During loading/unloading	<ul style="list-style-type: none"> <li>➤ Driver must stay with the vehicle at all times during loading/unloading activities.</li> <li>➤ Periodically inspect all systems, hoses and connections.</li> <li>➤ When making a connection, shut off the vehicle engine.</li> <li>➤ Monitor the liquid level in the receiving tank to prevent overflow.</li> <li>➤ Monitor flow meters to determine rate of flow.</li> <li>➤ When topping off the tank, reduce flow rate to prevent overflow.</li> </ul>
After loading/unloading	<ul style="list-style-type: none"> <li>➤ Make sure the transfer operation is completed.</li> <li>➤ Close all tank and loading valves before disconnecting.</li> <li>➤ Secure all hatches.</li> <li>➤ Disconnect grounding/bonding wires.</li> <li>➤ Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan.</li> <li>➤ Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.</li> <li>➤ Remove wheel chocks and interlocks.</li> <li>➤ Inspect the lowermost drain and all outlets on tank truck prior to departure.</li> </ul>

Tank \_\_\_\_\_ Inspector \_\_\_\_\_ Date \_\_\_\_\_



# APPENDIX D

## Facility Inspection Checklists

### Weekly/Daily Inspection / Maintenance Check List for Aboveground Storage Tanks

Inspector: \_\_\_\_\_ Inspection Date \_\_\_\_\_

Item #	Description of Inspection Items	Write "Y" if Repair / Maintenance Needed. Otherwise write "N"; Write "NA" if Not Applicable							Descriptions & Comments
		Aboveground Storage Tank (AST)		Underground Storage Tank (UST)			Drums		
		AST-D	AST-WO	UST-D	UST-G	UST-OWS			
1	Check leak detector for indication of fluid in interstice. If checked with a stick gauge, ensure the stick is clean and dry before insertion.								
2	Check for leaks on the pumps, filters, hoses, nozzles, joints and fittings.								
3	Check nipples, spill containment and manholes for paint or powder coating decay. Check piping and fitting for rust.								
4	Check pump meter and reset button.								
5	Check fuel gauge for proper operation								
6	Check spill containment for debris.								
7	Check for small cracks in concrete.								
8	Check readability of signs and decals.								
9	Check accumulation of liquid within concrete dike								

**Monthly Inspection / Maintenance Check List**

This inspection record must be completed each month including the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. Any item that receives a "Y" as an answer must be described and addressed immediately.

Item #	Description of Inspection Items	Inspection Date				Description & Comments
		Write "Y" if Repair / Maintenance Needed. Otherwise write "N"; Write "NA" if Not Applicable				
		Aboveground Storage Tank (AST)		Underground Storage Tank (UST)		
AST-D	AST-IWO	UST-D	UST-G	UST-OWS		
<b>A. Aboveground/Underground Storage Tanks</b>						
1	Liquid in interstitial space					
2	Check & record liquid levels taken manually with stick gauge					
3	Sight gauge reading does not match with manual reading and alarms are not operative.					
4	Water in the primary tank bottom under the fuel					
5	Leak detector tube cap is corroded and/or not operating properly.					
6	Weathering or cracks observed in the clear cap					
7	Electronic leak detection did not operate properly by using the test button.					
8	Pump motor shows signs of over-heating or excessive wear.					
9	Gaskets are leaking					
10	Sign of leakage in fill ports, spill containers, hatches, interstitial spaces					
11	Emergency shut-down system not operative					
12	Vents are obstructed and/or vent cap seal is not air tight					
13	Body of tank shows the sign of damage or cracks					
14	Body of tank is not clean and rusted where applicable. It needs to be painted.					
15	Equipment protectors, labels, signs, and/or decals are not visible and need replacement					
16	Slab and supports of the unit are not structurally sound					
17	Sign of leakage along the walls and under the tanks.					
18	Tank area is not clear of trash and vegetation. Stained soils are present.					
19	Grounding wires are not properly attached to the tank terminals and the grounding rod.					
20	Liquid in interstitial space					
21	Standing water / liquid in manhole/sumps/concrete dikes					
22	Monitoring devices are not working properly					
23	Vent pipe and cap are damaged					

### Monthly Inspection / Maintenance Check List

This inspection record must be completed each month including the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. Any item that receives "Y" as an answer must be described and addressed immediately.

Inspector: _____		Inspection Date: _____			
Item #	Description of Inspection Items	Tank Identifications		Description & Comments	
		AST-D	AST-WO		
24	Check accumulation of liquid within concrete dike				
<b>B. Piping and Sumps</b>					
25	Valve seals, gaskets, or other appurtenances are leaking				
26	Pipelines or supports are damaged or deteriorated				
27	Joints, valves and other appurtenances are leaking				
28	Buried piping is exposed				
29	Warning signs are missing or damaged				
30	Water / sheen observed in sumps				
<b>C. Fuel Dispensing Systems (Pumps, Nozzles, Hoses)</b>					
31	Sign of leakage from fuel dispensing systems				
32	Nozzles, hoses, and fittings show signs of wear and tear				
33	Oil/standing water in pump drip pans and sumps				
34	Pump motors show signs of over heating wear and tear				
35	Healy vacuum system is not functional				
36	Warning signs are missing or damaged				
<b>D. Response Equipment / Spill Kits</b>					
		Aboveground Storage Tank (AST)		Underground Storage Tank (UST)	
		AST-D	AST-WO	UST-D	UST-G
37	Response equipment / spill kits inventories not complete				
38	Response equipment / spill kits were not restocked				
<b>E. Security</b>					
Sitewide					
39	Fencing, gates, or lighting is non-functional				
40	Pumps and valves are locked if not in use				
<b>F. Drum Storage Rack</b>					
Steel Drums (20 @ 55 gallons each)					
41	Signs of spill/leakage are observed				
42	Liquid in spill bucket				

### Other Periodic / Annual Inspection & Maintenance Check List for Aboveground Storage Tanks

This inspection record must be completed each year in addition to the regular monthly inspections. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. \*Any item that receives "Y" as an answer must be described and addressed immediately.

Inspector: \_\_\_\_\_

Inspection Date: \_\_\_\_\_

Item #	Description of Inspection Items	Write "Y" if Repair / Maintenance Needed. Otherwise write "N"; Write "NA" if Not Applicable								Descriptions & Comments
		Aboveground Storage Tank (AST)		Underground Storage Tank (UST)				Drums		
		Tank Identifications								
		AST-D	AST-WO	UST-D	UST-G	UST-OWS				
1	Replace the dispenser filter at least every six (6) months or as needed (mark the date replaced on the filter) (dispensing facility)									
2	Check fuel for bacterial infestation or microbial growth									
3	Have a qualified person periodically check all electrical wiring									
4	Check the emergency relief vent at least once a year by lifting the top cap and releasing it to ensure freedom of movement									
5	At least once a year, remove the leak detection device and check for proper operation									
6	At least once a year, check the calibration of the fuel gauge									
7	Follow the pump manufacturer's recommendation for frequency and procedures of maintenance									
8	Document significant storage events per 40 CFR 112 and the State of New Jersey regulations.									

Note: See Table 4-2 for annual tests for buried pipes

## APPENDIX E

### Record of Annual Discharge Prevention Briefings and Training

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subjects Covered	Employees in Attendance	Instructor(s)

## **APPENDIX F**

### **Records of Tank Integrity and Pressure Tests**

Attach copies of official records of tank integrity and pressure tests.

# APPENDIX G

## Emergency Contacts

**Designated person responsible for spill prevention:** **Sam Martello**  
**Director of PWD**  
**(609)567-0700 Ext. 9000**

### EMERGENCY TELEPHONE NUMBERS:

#### Facility

Sam Martello, Director of Public Works Department / Facility Manager	(609)204-5777 (Cell)
Dave Pantalone, Facilities/NJ Class A/B UST System Operator	(609)744-1971 (Cell)
Michael Passerella, Supervising Technician	(609) 558-7209 (Cell)
Dayna Pitts, Secretary, Winslow Township Health Department	(609) 567-0700 x8008

#### Local Emergency Response

Winslow Township Fire Department	911 Non-Emergency: 609-561-4225  (856) 322-3060
----------------------------------	---

Virtua Berlin Medical Center

#### Response/Cleanup Contractors

HudsonAnalytix

856-342-7500

#### Notification

New Jersey Department of Environmental Protection

877-927-6337

800-424-8802

National Response Center

212-637-3660

United States Environmental Protection Agency, Region 2



## APPENDIX H

### Discharge Notification Procedures

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the NJDEP hot line and National Response Center.

NJDEP Hot Line  
Field Operations Manager, *Sam Martello*

Local Emergency (fire, explosion, or other hazards)

1-877-WARNDEP  
Cell: (609) *804-5777*  
Office: (609) 567-0700 x9003  
911

<b>Agency Organization</b>	<b>Agency Contact</b>	<b>Circumstances</b>	<b>When to Notify</b>
<b>Federal Agencies</b>			
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	<b>Immediately within 15 minutes (verbal)</b>
EPA Region II	1-212-637-3660	Discharge reaching navigable waters.	<b>Immediately within 15 minutes (verbal)</b>
EPA Region II Regional Administrator	U.S. EPA - Region 2 290 Broadway New York, NY 10007-1866	Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 2.1 of this Plan)
<b>State Agencies</b>			
NJDEP Hot Line	1-877-927-6337 1-877-WARNDEP	Any uncontrolled discharge	<b>Immediately within 15 minutes (verbal)</b>
Office of State Police	609-882-2000	When NJDEP Hot line inoperable 1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	<b>Immediately within 15 minutes (verbal)</b>
<b>Local Agencies</b>			
Fire / Police	911	1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	<b>Immediately within 15 minutes (verbal)</b>
Winslow Township Public Health Department	(609) 567-0700 x8008	Any discharge of 100 lbs or more that occurs beyond the boundaries of the facility, including to the air.	<b>Immediately within 15 minutes (verbal)</b>  Written notification within 7 days.
<b>Others</b>			
Response/cleanup contractors	(856) 342-7500	Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As needed

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the owner/operator;
- Date and time of the incident;
- Location of the incident;
- Source and cause of discharge;
- Types of material(s) discharged;
- Total quantity of materials discharged;
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines);
- Danger or threat posed by the release or discharge;
- Description of all affected media (e.g., water, soil);
- Number and types of injuries (if any) and damaged caused;
- Weather conditions;
- Actions used to stop, remove, and mitigate effects of the discharge;
- Whether an evacuation is needed;
- Name of individuals and/or organizations contacted; and
- Any other information that may help emergency personnel respond to the incident.

**Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:**

- Name of the facility;
- Name of the owner or operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

# Discharge Notification Form

Notification must not be delayed if information or individuals are not available.

Facility: Winslow Township Municipality Complex, Winslow Township, New Jersey

<b>Description of Discharge</b>		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name: Tel. #:	
Location of discharge	Latitude: Longitude:	Description:
Equipment source	Storage Tanks piping unknown	Description: Equipment ID:
Product	Diesel Gasoline Motor Oils other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
<b>Impacts</b>		
Quantity	Released:	Recovered:
Receiving medium	water** land other (describe):	Release confined to the facility property. Release outside the facility property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		

Action taken to prevent incident from reoccurring		
Safety issues	Injuries Fatalities Evacuation	
<b>Notifications</b>		
<b>Agency</b>	<b>Name</b>	<b>Date/time reported &amp; Comments</b>
WTPWD Spill Response Coordinator		
NJDEP Hot line		
EPA Region II office		
National Response Center 1-800-424-8802		
State police		
County Health Officer		
Oil spill removal organization/cleanup contractor		

## APPENDIX I

### Equipment Shut-off Procedures

Source	Action
Manifold, transfer/fill pumps or hose failure	Immediately close the header/manifold or appropriate valve(s). Shut off transfer/fill pumps.
Tank overflow	Shut in the transfer pump supplying fuel to the storage tank. Close header/manifold or appropriate valve(s)
Tank failure	Shut in the transfer pump supplying fuel to the tank storage tanks. Close inlet valve to the storage tank.
Pipe leak	Shut in the pump supplying fuel to the pipe. Close nearest valve to the rupture site to stop the flow of oil.
Explosion or fire	Immediately evacuate personnel from the area until the danger is over. Immediately shut in all operating pumps if safe to do so. If possible, close all manifold valves. If the fire is small enough such that it is safe to do so, attempt to extinguish with fire extinguishers available on site.
Equipment failure	Immediately close the nearest valve to stop the flow of fuel into the leaking area.

## APPENDIX J

### Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

#### Maintenance Building

G	Empty 55-gallons drums to hold contaminated material	1
G	Loose absorbent material	50 pounds
G	Absorbent pads	1 box
G	Nitrile gloves	2 pairs
G	Neoprene gloves	2 pairs
G	Vinyl/PVC pull-on overboots	2 pairs
G	Non-sparking shovels	1
	Brooms	5
G	Drain seals or mats	1

#### Fuel Dispensing / Emergency Generator Areas

G	Empty 55-gallons drums to hold contaminated material	1
G	Loose absorbent material	50 pounds
G	Absorbent pads	1 box
G	Nitrile gloves	2 pairs
G	Neoprene gloves	2 pairs
G	Vinyl/PVC pull-on overboots	2 pairs
G	Non-sparking shovels	1
G	Brooms	5
G	Drain seals or mats	1

## APPENDIX K

### Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 2 Regional Administrator, and to NJDEP, within 60 days of the qualifying discharge incident.

<b>Facility:</b>	<i>Winslow Township Municipal Complex</i>
<b>Owner/operator:</b>	<i>Winslow Township, New Jersey</i>
<b>Name of person filing report:</b>	
<b>Location:</b>	125 South Route 73, Braddock, NJ 08037
<b>Maximum storage capacity:</b>	<i>23,556 gallons</i>
<b>Daily throughput:</b>	<i>500 gallons</i>
<b>Nature of qualifying incident(s):</b>	Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons Second discharge exceeding 42 gallons within a 12-month period.
<b>Description of facility (attach maps, flow diagrams, and topographical maps):</b>	The Winslow Township Municipal Complex consists of three (3) masonry buildings used primarily for official activities, equipment storage, and vehicle maintenance. Containers for petroleum products storage at the facility consists of one (1) 956-gallon aboveground storage tank containing diesel fuel for an emergency generator, one (1) 500-gallon double-wall waste oil storage tank, twenty (20) 55-gallon steel drums for transmission and motor oils, one (1) 1,000-gallon unregulated underground Oil Water Separator for vehicle wash wastewater (exempt from SPCC compliance requirements), one (1) 10,000-gallon regulated double-wall fiberglass underground storage tank for gasoline (exempt from SPCC compliance requirements), and one (1) 10,000-gallon regulated underground storage tank for diesel (exempt from SPCC compliance requirements). The total oil storage capacity at the site is 23,566 gallons. All petroleum product storage tanks are shop-built and meet the American Petroleum Institute (API) tank construction standards. Fuel transfer operations regularly take place at the facility and are subject to SPCC compliance requirements.

<b>Agency Notification Standard Report (cont'd)</b>
<b>Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:</b>



**Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:**

**Additional preventive measures taken or contemplated to minimize possibility of recurrence:**

**Other pertinent information:**

## **APPENDIX L**

### **Written Commitment of Manpower, Equipment, and Materials**

In addition to implementing the preventive measures described in this Plan, WTPWD will also specifically:

- In the event of a discharge:
  - Make available all trained field personnel (three employees) to perform response actions
  - Obtain additional assistance from pre-qualified contractors / sub-contractors.
  - Collaborate fully with local, state, and federal authorities on response and cleanup operations
- Maintain all on-site oil spill control equipment described in this Plan. The equipment is estimated to contain oil spills of up to 200 gallons.
- Maintain all monitoring and communications equipment in operating condition at all times.
- Ensure that staging areas to be used in the event of a discharge to the wetland are accessible by field vehicles.
- Review the adequacy of on-site and third-party response capacity with pre-established response/cleanup contractors on an annual basis and update response/cleanup contractor list as necessary.
- Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup (see contract agreements maintained separately at the WTDPW office and lists of associated equipment and response contractor personnel capabilities).

Authorized Facility Representative:

Signature: Sam Martello  
Title: Director, DPW

## **APPENDIX M**

### **Photograph Log**

**Spill Prevention,  
Control, and  
Countermeasure Plan**

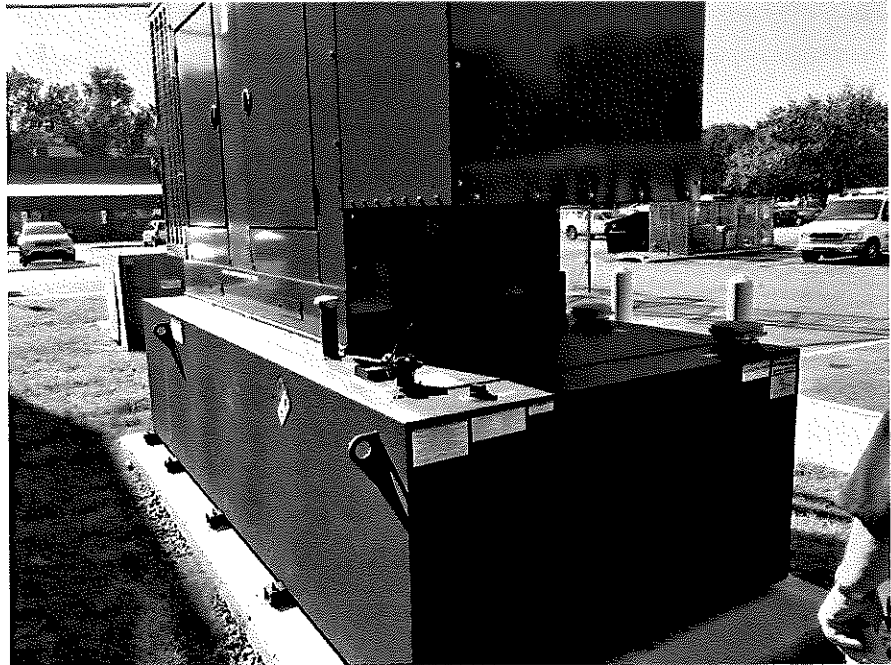
**Winslow Township  
Municipal Complex**

**December 2018**

**View 1:** Showing Fuel  
Dispensing Station

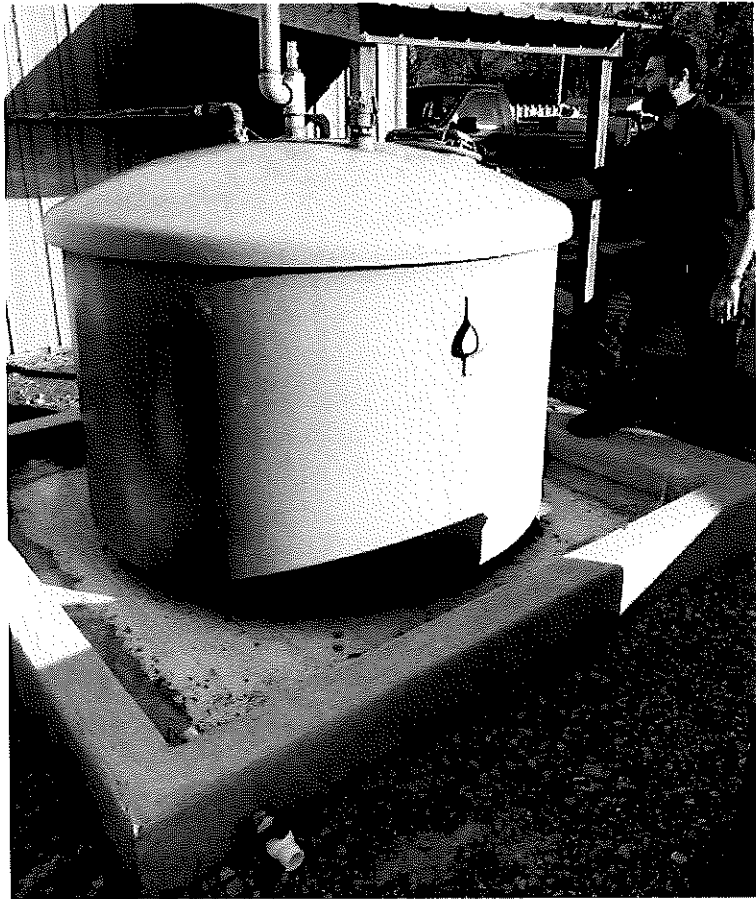


**View 2:** Showing AST-  
D



**CONSULTING AND MUNICIPAL ENGINEERS**  
3759 U.S. Highway 1 South, Suite 100  
Monmouth Junction, NJ 08852  
Ph: 732-951-2101 Fax: 732-951-2106

**Winslow Township Municipal  
Complex**  
125 South Route 73  
Braddock  
Camden County, NJ



*View 3: Showing AST-WO*



*View 4: Showing Portable Steel Drums (13 @ 55-gallons each)*



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*View 5: Showing Portable Steel Drums (7 @ 55-gallons each)*



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