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PRELIMINARY SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Allied Clean Fuels Facility
Napa, California

Prepared for:

Hunt & Sons, Inc.
5750 South Watt Avenue
Sacramento, California 95826

References: **Federal Regulation 40 CFR Part 112**
State of California, Health and Safety Code:
Chapter 6.67, sections 25270 et ceq.

Date: To Be Determined

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January 30, 2014
MGA Project No.: TBD

Napa County Environmental Health Division
1195 Third Street
2nd Floor
Napa, California 94559

RE: PRELIMINARY SPCC PLAN, ALLIED CLEAN FUELS FACILITY, NAPA, NAPA COUNTY, NEVADA

To Whom It May Concern:

McGinley and Associates, Inc. (MGA) has been contracted by Hunt & Sons to prepare their facility Spill Prevention, Control, and Countermeasure (SPCC) Plans. The information in this "Preliminary" SPCC Plan is meant to represent how the new plan will be modeled once the facility is in operation. Specific information presented in this Plan corresponds to another Hunt & Sons facility that utilizes similar oil storage and handling equipment which is regulated by 40 CFR 112 and State of California, Health and Safety Code: Chapter 6.67, sections 25270 et ceq. Once the Allied Clean Fuels Facility is designed, a SPCC Plan specific to the facility itself will be prepared and provided with the facility permit documents prior to commencement of operations.

Should you have any questions regarding the information presented in the "Preliminary" SPCC Plan, please don't hesitate to contact us.

Respectfully,

McGinley and Associates, Inc.

Brett Bottenberg
Project Manager

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1. INTRODUCTION

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by Hunt & Sons, Inc. San Andreas, California Bulk Plant (HS) to prevent oil discharges from occurring, and to prepare HS to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Spill Prevention, Control, and Countermeasure Plan (Plan)h as been prepared to meet the requirements of Title 40, *Code of Federal Regulations,* Part 112 (40 CFR part 112), and supersedes the earlier Plan developed to meet provisions in effect since 1974. Additionally, this plan complies with the State of California, *Health and Safety Code*,Cha pter 6.67, 25270 et ceq. Aboveground Petroleum Storage Act in regard to: Management Procedures, Spill Notification, Plan Reviews and Updates and, Inspections and Tests.

In addition to fulfilling requirements of 40 CFR Part 112, this 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 employees, as a guide to facility inspections, and as a resource during emergency response.

HS 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 F of this Plan.

1.1 SPCC Rule Compliance

This Plan provides guidance on key actions that HS must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 7.0) using the inspection checklists included in Appendices C and D.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 8.0) and document them on the log included in Appendix E.
- If either of the following occurs, submit the SPCC Plan to the EPA Region IX Regional Administrator (RA) along with other information as detailed in Section 3.2 of this Plan:
    1. 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
    2. The facility discharges oil in a quantity greater than one barrel (42 gallons) in each of two discharges occurring within any twelve month period.
- If the following occurs, notify the local Certified Unified Program Agency (CUPA), along with other information as detailed in Section 3.2 of this Plan:
    1. The facility discharges oil in a quantity greater than one barrel (42 gallons).
- 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 re-certified by a Professional Engineer on the certification page in Section 1.3 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.

1.2 Management Approval of SPCC Plans

HS is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasure Plan for its petroleum product bulk plant located at 716/746 Poole Station Road, San Andreas, CA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

As the Environmental Director of this facility, I have reviewed and approved this SPCC, and have appointed, Barry Johnston, as the authorized facility representative.

Environmental Director: Josh Hunt

Signature:_____

Date:_____

Authorized Facility Representative: Barry Johnston

Signature:_____

Title: Facility Manager

1.3 Professional Engineer Certification

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 generally accepted engineering standards and practices. The Registered Professional Engineer has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility (40 CFR 112.3(d)).

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this Plan in accordance with the requirements of 40 CFR Part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan.

Name: _____

Signature:_____

Date:_____

1.4 Location of the SPCC Plans

In accordance with 40 CFR 112.3(e), a complete copy of this Plan is maintained at the facility in the office building. The front office is attended whenever the facility is operating, i.e., 7:00 AM to 5:00 PM, Monday through Friday.

1.5 Plan Review (40 CFR 112.3 and 112.5)

1.5.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), HS periodically reviews and evaluates this 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 containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; 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.
- Periodic regulatory review to update procedures and requirements to review adopted into applicable Federal, State and local rules and regulations

Date	Section	Revision
August, 2011	Whole Document	Addition of adjacent property (716 Poole Station Rd.) to facility (warehouse drum storage); addition of five ASTs to facility storage capacity; addition of loading/transfer area with bermed containment adjacent to newly added ASTs; addition of oil/water interceptor to facility

1.5.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), HS reviews this Plan at least once every five years (in the past, such reviews were required every three years). Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). This updated Plan is dated *August, 2011 (original Plan dated April, 2008)*. The next scheduled plan review is therefore scheduled to take place on or prior to *April, 2013*.

Additionally, as set forth in California Health and Safety Code section 25270.6(a)., SPCC review procedures include that on or before January 1, 2009 and annually thereafter, the facility shall file a "Tank Facility Statement" to the CUPA.

Scheduled Date	Scheduled Item
April 2012	Tank Facility Statement - CUPA
April 2013	Tank Facility Statement - CUPA; 5-Year Plan Review
April 2014	Tank Facility Statement - CUPA
April 2015	Tank Facility Statement - CUPA
April 2016	Tank Facility Statement - CUPA
April 2017	Tank Facility Statement - CUPA
April 2018	Tank Facility Statement - CUPA; 5-Year Plan Review
April 2019	Tank Facility Statement - CUPA
April 2020	Tank Facility Statement - CUPA

1.5.3 Cross-Reference with SPCC Plan Provisions

In some instances this 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 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR Part 112 and the California Health and Safety Code, Chapter 6.67, 25270 et ceq.

Table 1: SPCC Plan Cross-Reference

SPCC[1]	California H&S Code	Plan Section	Page
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112.8(d)		15.0 Transfer Operations, Pumping and In-Plant Processes	24
112.20(e)		Certification of Substantial Harm Determination	Appendix F

(1): Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

2. GENERAL FACILITY INFORMATION (REF. 112.7)

Facility Owner:	Hunt & Sons, Inc. 5750 South Watt Avenue, Sacramento, California 95826 (800) 734-2999
Facility Operator:	Hunt & Sons, Inc. 716/746 Poole Station Road San Andreas, California 95249 (209) 754-3550
Facility Contact:	Barry Johnston Plant Manager (530) 754-3550

2.1 Facility Location

The facility location is indicated in Figure 1. The facility address is 716/746 Poole Station Road, San Andreas, California. The facility is located at Latitude N 38°11'57" and Longitude W 120°41'35".

2.2 Facility Description

The facility is a petroleum bulk storage plant for marketing and redistribution of petroleum light products, lubricants, gasoline, kerosene, and No. 2 diesel fuel oil. Bulk deliveries of liquid petroleum products made to this operation are transferred by truck-transport tankers into the aboveground storage tanks (ASTs) via a transfer pump located inside the containment area. Product is transferred from the ASTs to smaller containers for industrial uses. Product is also transferred from the ASTs to "tankwagon vehicles" for bulk deliveries to residential and commercial customers via a transfer area or a loading rack located upon a bermed concrete-surfaced fueling pad. In addition, cardlock fueling dispensers provide fuel to commercial customers.

2.3 Conformance with Requirements and Compliance with all Applicable parts (Ref. 112.7(a)(1) and (a)(2))

The prevention of oil spillage and its reaching navigable water is inherent in the design of the plant's physical facilities and operating procedures, and is discussed in detail in subsequent sections. In general, the facility meets the requirements of 40 CFR 112, specifically, 112.7 and 112.8.

In addition to the secondary containment for the ASTs, this facility uses an earthen catchment basin as part of its drainage system to contain oil discharged in certain areas of the facility (i.e., overfills, and the loading/unloading area). The catchment basin provides environmental protection equivalent to the requirements under 112.8(b)(3) to use ponds, lagoons, or catchment basins to retain oil at the facility in the event of an uncontrolled discharge. As described in Section 5.0 of this Plan, the operational and emergency oil storage capacity of the catchment basin is sufficient to handle the quantity of oil expected to be discharged in un-diked areas from transfer operations.

Non-destructive integrity evaluations have not been performed on ASTs 1 through 10. The tanks are inspected following a regular periodic inspection schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. The ASTs are subject to formal external inspections as provided in Section 14.2.6 of this Plan.

Non-destructive integrity evaluations are not performed on the totes or the 55 gallon drums. Drums and totes are kept within the warehouse, placed upon concrete flooring, and have all sides visible. Any leak would be readily detected by facility personnel before it can cause a discharge to navigable waters or adjoining shorelines. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage area is inspected daily. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by the EPA in the preamble to the SPCC rule at 67 Federal Register 47120.

2.4 Facility Layout (Ref. 112.7 (a)(3))

A facility site plan is provided in Figure 2. As required under 40 CFR 112.7(a)(3), the facility site plan includes the location of fire suppression USTs (water filled), and mobile/portable containers. The facility is located on an approximate 2.7-acre site. The site is developed with an office building,w arehouse building, storage areas,fi fteen aboveground petroleum product storage tanks, fire suppression underground storage tanks, secondary containment structures, a loading rack, and a cardlock fueling area.

2.4.1 Product types and storage capacity (Ref 112.7 (a)(3)(i))

Provided in Table 2 are the types of oil products and maximum quantities stored at the facility. Potential spill sources relating to the operation of facility are presented in Section 4 of this Plan.

Table 2. Petroleum Product Storage Inventory

Tank No.	Capacity	Product Stored	Location
1	5,000 gal	Lube Oil	Vertical AST containment area
2	5,000 gal	Lube Oil	Vertical AST containment area
3	5,000 gal	Lube Oil	Vertical AST containment area
4	5,000 gal	Lube Oil	Vertical AST containment area
5	2,000 gal	Lube Oil	Vertical AST containment area
6	2,000 gal	Lube Oil	Vertical AST containment area
7	2,000 gal	Lube Oil	Vertical AST containment area
8	2,000 gal	Lube Oil	Vertical AST containment area
9	1,000 gal	Kerosene	North exterior of warehouse, within secondary containment
10	250 gal	Waste oil	North exterior of warehouse, within secondary containment
11	20,000 gal	Regular Gasoline	Horizontal AST containment area
12A	10,000 gal	Premium Gasoline	Horizontal AST containment area
12B	10,000 gal	Kerosene	Horizontal AST containment area
13A	10,000 gal	Red Diesel	Horizontal AST containment area
13B	10,000 gal	Clear Diesel	Horizontal AST containment area
14	20,000 gal	Clear Diesel	Horizontal AST containment area
15	20,000 gal	Red Diesel	Horizontal AST containment area
Drums	4,400 gal (80 x 55 gal)	Misc Lube Oil	Warehouse (716 Poole Station)/yard
Totes	4,400 gal (16 x 275 gal)	Misc Lube Oil	Exterior tote storage area

3. DISCHARGE PREVENTION-GENERAL SPCC PROVISIONS

The following measures are implemented to prevent petroleum product discharges during the handling, use, or transfer of petroleum products at the facility. Employees have received or will receive the proper implementation of these spill prevention measures in a timely fashion.

3.1 Discharge Prevention Measures (Ref 112.7 (a)(3)(ii)

ASTs are inspected regularly in accordance with the facilities Weekly Inspection Checklist (Appendix D) following a regular schedule as outlined in the Steel Tank Institute (STI) SP-001-03 tank inspection guidance as provided in Appendix C. Any leakage from the containers would be detected visually during scheduled visual inspections by facility personnel.

Mobile/portable containers in the form of 55-gallon drums and 275 gallon totes are provided with appropriate containment and/or diversionary structures that will include: sorbent materials and/or curbing as a diversionary structure. Any leak would be readily detected by facility personnel before it could cause a discharge to navigable waters or adjoining shorelines. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage area is inspected monthly. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by the EPA in the preamble to the SPCC rule at 67 Federal Register 47120.

All areas are maintained in a clean, orderly manner to minimize the potential for pollutants to leave the facility. These areas are: AST containment areas and associated conveyance piping, truck loading/unloading area, tote storage area, main office/warehouse and loading dock, and the tire shop/warehouse. Dirty rags, empty containers, broken or worn out equipment and parts are properly disposed of on a regular basis and will never be stored on-site for more than 90 days.

Detailed procedures for prevention of discharges during the transferring of products at the facility, including loading and unloading procedures are provided in Section 15. During AST loading and unloading operations, the tanker truck is parked on either a gravel surfaced apron (vertical AST area) or a bermed concrete surfaced apron (horizontal AST area). AST piping for the vertical AST transfer area is located within the secondary containment structures. A release from loading/unloading operations at this location will be confined within these areas or diverted to the earthen catchment basin downgradient of the facility (east). AST piping for the newly installed horizontal AST loading rack exists within a bermed (5" rollover) area that has a manually released drain valve that provides drainage to an oil/water separator. Any release from loading/unloading operations will be collected within this oil/water separator. The maximum single compartment capacity of any tanker truck loading at the loading rack at the facility is 3,000 gallons. Additionally, sorbent materials are stored on site for minor spills and leaks. Small amounts of spilled or leaked oil or other liquid (typically less than 25 gallons) is immediately removed using the following three-step process:

1. Clean up leaks with rags or absorbent pads;
2. Sweep the area using granular absorbent material (cat litter, etc.);
3. Contain debris within sealed 55-gallon drums for off-site disposal.

On-site cleaning has been reduced to a minimum and cleaning will never be performed with solvents unless the cleaning operations are completely contained. The procedures for cleaning and reporting larger spills are detailed in Sections 3.2 and 3.3 and Appendix A of this Plan.

3.1.1 Discharge and Drainage Controls (Ref 112.7 (a)(3(iii))

As discussed in Section 5 of this Plan, this facility includes a number of discharge and drainage controls including secondary containment areas, an earthen catchment basin, and a recently installed oil/water separator system.

The facility has implemented several material management practices and there are structural and non-structural controls in place to prevent pollutants from entering storm water run-off. All storm water or pollutants that enter the secondary containment areas are periodically removed and disposed of in accordance with federal, state, and local regulations. The existing structural and non-structural controls utilized to reduce pollutants in storm water runoff from the property include:

1. All AST loading, unloading areas are surfaced with concrete;
2. Fully enclosed material storage areas;
3. Catchment basin;
4. Secondary containment placed around the bulk storage ASTs;
5. Secondary containment placed around loading rack; and
6. Good housekeeping measures, including sweeping and immediate cleanup of spills and leaks

Permitted discharges at the facility may include: wastewaters from sinks, toilets, emergency showers, drinking fountains and eyewash stations. All sanitary wastes are directed and discharged into the municipal sanitary sewer system of the City of San Andreas.

3.1.2 Countermeasures ((Ref 112.7 (a)(3)(iv))

Countermeasures to prevent oil discharges involve the timely inspection and maintenance of spill containment devices as well as inspecting and testing facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. Specific discussions on inspections to be performed are discussed in Section 7 of this Plan.

3.1.3 Contaminated Material Disposal (Ref 112.7 (a)(3)(v))

All contaminated materials derived from spill response actions (sorbent materials, contaminated soils, etc.) will be properly disposed of in accordance with all applicable local, state and federal regulations.

3.1.4 Emergency Contact List (Ref 112.7 (a)(3)(vi))

Any release which reaches a storm drain must be reported immediately to the following:

Fire Department:	911
National Response Center:	1-800-424-8802
State Office of Emergency Response:	1-800-852-7550
Certified Unified Program Agency/CUPA (Calaveras County Department of Environmental Health):	1-209-754-6399.
Barry Johnston, Plant Manager/Environmental Director:	1-209-273-3550
Josh Hunt, Environmental Director:	1-800-734-2999

3.2 Procedures for Release Reporting (Ref 112.7 (a)(4))

Notify the Plant Manager/Environmental Director regardless of quantity released. In the event of a spill or release exceeding 42 gallons, follow these agency notification requirements:

Step 1: Notify the Plant Manager/Environmental Director; and provide the following information:

1. Date and time of discharge
2. Type of substance released
3. Estimate of Quantity released
4. Source of discharge
5. A description of all affected media
6. Status of release including actions being used to stop, remove and mitigate the effects of the discharge
7. Whether an evacuation may be needed
8. Individuals or organizations contacted
9. Any injuries
10. Any property damage

Step 2: Notify onsite personnel of evacuation procedures, if necessary.

Step 3: Notify Emergency Facilities – Dial 911 if necessary.

Step 4: Notify the California Office of Emergency Management at 1-800-852-7550

Step 5: Notify the local CUPA at 1-209-754-6399

Step 6: If a *hazardous material* release exceeds the reportable quantity for that substance, the Environmental Director will contact the Calaveras County Department of Environmental Health at (530) 283-6355.

3.3 Procedures for Release Response (112.7(a)(5))

In the event of a spill or leak, perform the following steps as needed:

Step 1: Stop the source of release; turn off pumps using the emergency shut down switch, close valves, etc.

Step 2: Make proper notifications, contact emergency facilities, etc. (See section 3.2 of this Plan).

Step 3: Dike area using absorbent, booms or bags of floor dry or other physical barrier. Allow drainage to flow into collection areas.

Step 4: If spills occur in areas outside of the sloping concrete pads or other secondary containment devices, then pour floor dry on the perimeter of the hazardous materials spill, making a berm around the spill.

Step 5: Pour additional absorbent on the remaining spilled hazardous materials slowly, to allow it to absorb and keep it from splashing.

Step 6: Cover or dike around threatened storm drains or facility sanitary sewer inlets.

Step 7: Using a shovel, place the absorbed hazardous materials in DOT drums for storage.

Step 8: Label the drum with an appropriate waste label, include all information requested.

Step 9: Store the drum in a secured, locked area until disposal arrangements are made.

4. PREDICTION OF SPILL CHARACTERISTICS (REF. 112.7(B))

4.1 Facility Operations

The property consists of one office/warehouse structure, one tire shop/warehouse structure, asphalted parking lot and travel corridors, fueling areas, and minor landscaped areas. The property generally slopes to the east towards the front of the property and Poole Station Road. Drainage from the cardlock fuel dispensing area is directed towards a trench drain along the northern edge of the fuel dispensing area. The trench drain leads to the oil/water separator. Additional storm drainage is provided by a drop inlet adjacent to the oil/water interceptor that leads to an earthen catch basin.

Spillage at this facility should be minimal as petroleum product loading and unloading operations are observed by onsite personnel. The facility has appropriate spill containment and/or diversionary structures to prevent any surface spills from reaching and entering navigable water.

The predictions described as follows are based upon: (1) the failure of normal storage or piping and fuel transfer facilities and, (2) the additional failure of collection and containment facilities to prevent spillage from escaping the facilities. The following predictions include direction, rate of flow, and total quantity of oil that could be discharged as a result of each major type of failure.

4.1.1 Concurrent Leak/Failure of Vertical AST and AST Secondary Containment

The floor of the AST containment area is constructed of concrete and the walls of the containment area are constructed of concrete masonry units (CMU). Penetrations through

the containment area are sealed. The net capacity of the containment area is approximately 24,361 gallons. The containment area is sized to contain in excess of 110 percent of the largest AST (5,000-gallon). In the highly unlikely event of a release, the following predictions would apply.

Rate of Flow: The rate of flow from a failure of the containment area could be in excess of 50 gpm until the emergency response measures are implemented. Flow across the facility site is estimated at less than 2 foot per second.

Total quantity of product which could be discharged: The total quantity of product which could be discharged upon a catastrophic breach of the secondary containment system is 5,000 gallons, the maximum fill capacity of one of the largest tanks.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area could flow across facility grounds towards the earthen catch basin with subsequent infiltration into the ground surface, or flow towards the parcel located north of the ASTs.

4.1.2 Concurrent Leak/Failure of Horizontal AST and AST Secondary Containment

The floor of the AST containment area is constructed of concrete and the walls of the containment area are constructed of concrete masonry units (CMU). Penetrations through the containment area are sealed. The net capacity of the containment area is approximately 90,442 gallons. The containment area is sized to contain in excess of 110 percent of the largest AST (20,000-gallon). In the highly unlikely event of a release, the following predictions would apply.

Rate of Flow: The rate of flow from a failure of the containment area could be in excess of 50 gpm until the emergency response measures are implemented. Flow across the facility site is estimated at less than 2 feet per second.

Total quantity of product which could be discharged: The total quantity of product which could be discharged upon a catastrophic breach of the secondary containment system is 20,000 gallons, the maximum fill capacity of one of the largest tanks.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area would most likely flow across facility grounds towards the earthen catch basin with subsequent infiltration into the ground surface, or flow into the adjacent bermed loading area with subsequent drainage to the oil/water separator.

4.1.3 Tank Truck Vertical AST Loading/Unloading Area

In the vertical AST transfer area, there is potential for failure if the loading system piping is parted or broken off while loading.

Rate of Flow: The rate of flow into the AST is approximately 100 to 200 gallons per minute (gpm). The maximum rate of flow if a loading system component is accidentally broken off while loading is approximately 200 gpm. Flow across the facility site is estimated at less than 2 feet per second.

Total quantity of product which could be discharged: The total quantity of oil which could be discharged is 3,000 gallons, the largest single compartment of a delivery tanker truck.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area could flow across facility grounds towards the earthen catch basin with subsequent infiltration into the ground surface, or flow towards the parcel located north of the ASTs.

4.1.4 Tank Truck Horizontal AST Loading Rack

In the AST loading rack area, there is potential for failure if the loading system piping is parted or broken off while loading. The containment area is sized to contain 110 percent of the largest tanker truck compartment (3,000-gallon). In the highly unlikely event of a release, the following predictions would apply.

Rate of Flow: The rate of flow into the AST is approximately 100 to 200 gallons per minute (gpm). The maximum rate of flow if a loading system component is accidentally broken off while loading is approximately 200 gpm. Flow across the facility site is estimated at less than 2 feet per second.

Total quantity of product which could be discharged: The total quantity of oil which could be discharged is 3,000 gallons, the largest single compartment of a delivery tanker truck.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area would most likely flow across facility grounds towards the earthen catch basin with subsequent infiltration into the ground surface.

4.1.5 Concurrent Leak/Failure of Kerosene AST and AST Secondary Containment

Rate of Flow: The rate of flow from the ruptured kerosene AST could be 10 gpm until the capacity of the container has drained. Flow across the facility site is estimated at less than 2 feet per second.

Total quantity of oil which could be discharged: The total quantity of oil which could be discharged is 1,000 gallons, the entire capacity of the kerosene AST.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area could flow into the earthen catch basin, infiltrate into ground surface, or flow onto the parcel located north of the ASTs.

4.1.6 Concurrent Leak/Failure of 250 gallon Waste Oil AST

Rate of Flow: The rate of flow from the ruptured waste oil AST could be 10 gpm until the capacity of the container has drained. Flow across the facility site is estimated at less than 2 feet per second.

Total quantity of oil which could be discharged: The total quantity of oil which could be discharged is 250 gallons, the entire capacity of the AST.

Direction of Flow: Depending on the location of the containment failure, flows from the containment area could flow into the earthen catch basin, infiltrate into ground surface, or flow onto the parcel located north of the ASTs.

4.1.7 Drums in Warehouse

Rate of Flow: The rate of flow from a ruptured 55-gallon drum could be 10 gpm until the capacity of the container has drained. Flow across the facility is estimated at less than ½ foot per second.

Total quantity of product which could be discharged: The total quantity of product which could be discharged is 55 gallons, the entire capacity of one drum.

Direction of Flow: Spills from the 55-gallon drums located in the warehouse would flow across the concrete floor and accumulate at the lowest point within the warehouse. Product flowing beyond the warehouse walls would infiltrate into ground surface and/or flow towards the northeast

4.1.8 Tote Storage Area

Rate of Flow: The rate of flow from a ruptured 275-gallon tote could be 10 gpm until the capacity of the container has drained. Flow across the facility is estimated at less than ½ foot per second.

Total quantity of product which could be discharged: The total quantity of product which could be discharged is 275 gallons, the entire capacity of one tote.

Direction of Flow: Spills from the containers located in the yard would flow towards the earthen catch basin with subsequent infiltration into the ground surface.

4.1.9 Cardlock Fueling Operation

Cardlock access is provided to retail customers 24 hours a day. A spill situation could take place due to a customer driving away from the dispenser while the hose is still attached to the vehicle. The fuel dispensers are equipped with a safety disconnect valve which immediately stops the flow of fuel.

Rate of Flow: The rate of flow from a disconnected hose could be 1 gpm until the capacity of the hose has drained. Flow across the facility is estimated at less than ½ foot per second.

Total quantity of product which could be discharged: The total quantity of product which could be discharged is 1-2 gallons, the entire capacity of one dispensing hose.

Direction of Flow: Spills from the cardlock area would flow to the north towards a trench drain which leads to the earthen catch basin.

5. CONTAINMENT AND DIVERSIONARY STRUCTURES (REF. 112.7 (C))

Regulations found in 40 CFR, Part 112 require the following prevention systems or their equivalents: dikes, berms, retaining walls, curbing, culverting, gutters, weirs, booms, spill diversion ponds, or impounding (catchment) basins, or sumps, and sorbents. The secondary containment systems of the facility are sufficiently impervious to oil, and oil will not permeate, drain, or escape from the containment system and reach navigable waterways before cleanup occurs. Calculations used to determine the capacity of the containment areas are provided in Appendix B.

The following secondary containment and diversionary structures are utilized at the facility to prevent oil discharges from reaching navigable waterways:

5.1 Vertical AST Area

The vertical ASTs are located within a containment area. The floor of the containment area is constructed of concrete and the walls of the containment area are constructed of concrete masonry units (CMU). Penetrations through the containment area are sealed. The net capacity of the containment area is approximately 24,361 gallons. The containment area is sized to contain in excess of 110 percent of the largest AST (5,000-gallon).

5.2 Horizontal AST Area

The horizontal ASTs are located within a containment area. The floor of the containment area is constructed of concrete and the walls of the containment area are constructed of concrete masonry units (CMU). Penetrations through the containment area are sealed. The net capacity of the containment area is approximately 67,249 gallons. The containment area is sized to contain in excess of 110 percent of the largest AST (20,000-gallon).

5.3 Vertical AST Loading/Unloading/Transfer Areas

The loading connections are located inside the AST secondary containment area; therefore, any leaks from the loading area piping would be contained inside the AST containment area. Another failure mode could occur when the truck system piping is parted or broken off while loading. The total quantity of product which could be discharged is 3,000 gallons, the largest single compartment of a delivery tanker truck.

Drainage from the loading/unloading area is directed onto a bermed concrete pad. Additional drainage is provided by a masonry catch basin and an earthen catch basin.

5.4 Horizontal AST Loading Rack Areas

The loading rack is located on a concrete pad surrounded by a five inch rollover berm. The net capacity of the containment area is approximately 4,817 gallons. The containment area is sized to contain 110 percent of the largest tanker truck compartment (3,000 gallons). The total quantity of product which could be discharged is 3,000 gallons, the largest single compartment of a delivery tanker truck. In addition, a drain system within the containment area directs storm runoff and spilled or leaked product to a newly placed oil/water separator adjacent to the earthen catch basin on the eastern portion of the site.

5.5 Kerosene AST

The 1,000 gallon kerosene storage tank has secondary containment provided and is located on the north exterior of the office. The containment area is sized to contain 110 percent of the AST (1,000-gallon). The tank is not located in an area subject to vehicular impact. If un-controlled, spills from the oil tank would flow in an easterly direction towards the earthen catch basin located at the front of the property.

5.6 Waste Oil AST

The 250 gallon waste oil storage tank has secondary containment provided and is located on the north exterior of the office. The containment area is sized to contain 110 percent of the AST (250 gallon). The tank is not located in an area subject to vehicular impact. If un-controlled, spills from the oil tank would flow in an easterly direction towards the earthen catch basin located at the front of the property.

5.7 Aboveground Piping

The aboveground piping located in the tank yard and loading/unloading area is provided with secondary containment sufficient to contain incidental drips and spills during hose connection.

5.8 Warehouse Storage

Absorbent materials are available in the warehouse to capture releases from the 55-gallon drums and/or totes. Releases would be readily detected by facility personnel before it could cause a discharge to navigable waters or adjoining shorelines.

5.9 Tote Storage Area

Absorbent materials are readily available to capture releases from the 275-gallon totes. Releases would be readily detected by facility personnel before it could cause a discharge to navigable waters or adjoining shorelines.

5.10 Cardlock Fueling Area

Absorbent spill kits are available within labeled drums at the fuel dispensing area to capture releases from the dispensers. Releases would be readily detected by fueling customers before it could cause a discharge to navigable waters or adjoining shorelines.

6. DETERMINATION OF PRACTABILITY (REF. 112.7 (D))

Based on the current construction of the facility as discussed herein, all applicable structures and pieces of equipment as described in 40 CFR, Part 112, §112.7 and 112.8 have been satisfied.

7. INSPECTIONS/TESTS AND RECORDS (REF. 112.7 (E))

HS has a comprehensive preventive maintenance program. This program is monitored by the Owner and performed by the Plant Manager. Routine visual system inspections of tanks, supports, valves, piping, containment systems, foundations and appurtenances as well as, weekly inspections of specific facility components are an inherent part of this plan. The AST weekly inspection checklist is provided in Appendix D.

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Additionally, visual inspections are performed on piping, valves, appurtenances, foundations, and supports to assess the equipment's fitness for continued service. The records of the results of testing are maintained at the facility and are available for review upon request. Section 14.2.6 of this Plan indicates the inspection and testing schedule for the bulk containers located at HS.

8. PERSONNEL TRAINING (REF. 112.7 (F))

The designated person accountable for spill prevention at the facility is Barry Johnston (Plant Manager). During monthly safety meetings, spill prevention is an agenda item. The Plant Manager reviews spill prevention with drivers during driver meetings. All meetings are documented with attendee's signatures.

At least annually all personnel handling oil shall be given training in oil spill prevention, including operation and maintenance of equipment. The training shall include a thorough review of all parts of this Plan, both for routine operations and for emergency situations. Where specific responsibilities are assigned, these requirements will be reviewed. All such training occasions will be documented with an employee roster, which is signed by each employee. This document will be kept in a master binder or file of the SPCC Plan. A copy of the Plan will be on display, accessible to all employees at all times. New employees who handle oil or oil products shall be given as much spill prevention training as is commensurate with his/her new status and ability to be effective. This training will be provided within one week of employment. A copy of the facilities Spill Prevention Briefing Form is provided in Appendix E.

Training for all employees will include reference to, and analyses of any past spills and the experience resulting there from. The Plant Manager will designate specific personnel to:

1. Make contacts and report spills in a spill incident.
2. Undertake control of spillage, assure containment and retrieve spillage.

3. Restore property and remediate contaminated property except where an outside cleanup contractor may perform this function.

The designated spill response employees, with the Plant Manager in command, will undertake a rehearsal of a spill incident. The rehearsal will include an investigation of the potential flow route of spillage with special attention given to strategic points to achieve barricading, sealing, and containment: curbs, drains, culverts, open ditches.

The Person-In-Charge will utilize the "Contact List and Telephone Numbers" provided in Section 3.1.4 of this Plan in developing a training session for oil-spill response.

All employees will be briefed in the basic and essentials of the Hazard Communications Standard (Employee Right-To-Know) and Material Safety Data Sheets for all products accessible to them. Where their duties place them in contact with exposed petroleum products and petroleum-handling equipment, their on-the-job training will include such practices that will tend to minimize exposures and hazards that might be injurious.

9. SECURITY (REF. 112.7 (G))

9.1 Fencing

Due to the location of the facility, fencing cannot be used as a security measure for all areas of the facility. However, fencing and locked access is provided for the truck loading area at the front of the property, the main yard and office areas. HS is reviewing alternative security measures at this time and will update the Plan as appropriate.

9.2 Valves

All bulk storage tanks are equipped with bottom loading/dispensing configurations and must remain in the open position to allow fuel dispensing at the facility's cardlock operation. However, fencing and locked access is provided for the tank yard to restrict access to the valves during non-operating hours.

9.3 Pumps

The starter control for the transfer pumps shall be locked in the "off" position and accessible only to authorized personnel during non-operation and unattended hours.

9.4 Piping

Piping connections not in service or out of service for six months or more shall be capped or blank-flanged. All piping connections in service shall be color-coded or equipped with product identification signs.

9.5 Facility Lighting

This facility will be equipped with automatic area lights so positioned as to illuminate the plant and office facilities and are sufficient to detect a release during hours of darkness.

10. TANK TRUCK LOADING/UNLOADING RACK (REF. 112.7(H))

10.1 Loading/Unloading Pads

The tanker transport loading and unloading pad construction and containment device are presented in Section 5 of this Plan. As discussed, potential spillage from loading and unloading activities are directed to an oil/water separator. The maximum capacity of any

single compartment of a tank truck loaded or unloaded at the facility rack is 3,000 gallons.

10.2 Disconnections

Warning signs are provided in the Loading Rack area to caution drivers departing before complete disconnection of flexible or fixed oil transfer lines.

10.3 Departures

Prior to filling and departure of any tank vehicle, the lower drain and all other outlets will be checked for leakage. Any problems will be corrected before departure.

10.4 Procedures for Transferring Products

10.4.1 Loading Rack Procedures

1. If you are not cleared to load at the rack or terminal, check with the Operator. You will not be able to load until you are cleared by the Operator.
2. Once you are cleared to load, proceed to the loading rack, observing other trucks waiting for the same rack. Wait your turn to load.
3. Before pulling onto the rack, turn off all radios and electronic devices, check for ground cords in the roadway, standing or spilled product that must be washed down, and leaking loading arms. If you have any problems, notify the Operator first before loading.
4. Pull onto the loading rack slowly and position truck to load product, set truck brakes and turn off engine.
5. Follow rack procedures using required product/driver cards.
6. Attach rack ground cable to the truck and trailer.
7. Hook up rack vapor hose to truck and trailer.
8. Attach product loading arm to truck dry brake by method available.
9. Load truck accordingly to rack instructions, observing all safety measures. Be sure to load the correct amount of product in each compartment so as to stay within weight limit of the truck.
10. After you are finished loading, disconnect truck in reverse order as you did when connecting.

10.4.2 Bulk Deliveries

1. Notify plant of date, time, product type and quantity to be delivered.
2. Park truck at the unloading headers. Check for broken seals.
3. Verify the tank to be filled has sufficient space to accept delivery.
4. If the tank outage shown is not sufficient to take the full load, the driver shall contact the Manager at the number listed. The driver shall wait for the branch manager to arrive prior to beginning delivery.
5. If the driver finds the bulk plant not ready to accept shipment, then the driver shall contact the Plant Manager and await his arrival before proceeding.
6. Failure of the plant equipment to operate properly or any other abnormal occurrence is to be immediately reported to the branch manager. If the branch manager or his alternate cannot be reached, report the problem to the dispatcher.
7. Check to be sure product tag on unloading header is the same as product in the truck and proceed as follows:

8. Remove the unloading header cap and connect truck unloading hose.
9. Open truck valve, unloading header valve and start pump.
10. During unloading of truck, closely watch all operations to see that there are no leaks and that product is going into the correct tank and not overflowing. Under no circumstances is the driver to leave the unloading area or sit in the truck cab while unloading is progressing except to make the observations as noted.
11. If an overflow or spill occurs, the driver is to stop unloading at once. Follow the procedures outlined in Sections 3.2 and 3.3 of this Plan.
12. If it is discovered that any product is inadvertently pumped into the wrong tank (containing a different product) the driver will cease unloading and notify the branch manager immediately.
13. When the truck is empty, disconnect unloading hose at truck end and drain truck thoroughly into the 5-gallon bucket. Contents of the bucket can be poured into the hose directly or with the funnel. Make sure the bucket is in contact with the funnel or hose coupling (grounded) before pouring gasoline. No product should be left in the bucket. Disconnect and remove unloading hose and replace unloading header cap.
14. Close and lock unloading header valve if there is one.
15. Close all drainage valves to catchment basis (one in tank yard , one in catchment basis)
16. When ready to leave the plant, remove equipment from yard and lock gates.

10.5 Piping

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

Piping systems at the facility are designed and operated in such a manner that the potential for oil spillage is minimal. To reduce corrosion, above ground piping is galvanized or painted. Piping which is not in service will be capped, valved or otherwise restrained to prevent oil spills. Piping supports are designed according to good engineering practice.

Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin. 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.

11. ABOVEGROUND CONTAINER REPAIR, ALTERATION, RECONSTRUCTION OR CHANGE IN SERVICE (REF. 112.7(I))

All ASTs at this plant were shop built. The shell thickness' are less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 *Tank Inspection, Repair, Alteration, and Reconstruction* (API-653), brittle fracture is not a concern for tanks that are shop built and have a shell thickness of less than one-half inch.

Nonetheless, in the event that an AST undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be

evaluated for risk of discharge or failure, following the Steel Tank Institute SP001 approach, and corrective action will be taken as necessary.

12. CONFORMANCE WITH APPLICABLE STATE AND LOCAL REQUIREMENTS (REF. 112.7(J))

All bulk storage tanks at this facility are registered with the state and local authorities and have current certificates of registration and special use permits required by the local fire code.

The prevention of oil spillage and its reaching navigable water is incorporated in the design of the plant's physical facilities and operating procedures. The facility meets the requirements of 40 CFR 112, specifically, 112.7 and 112.8.

13. QUALIFIED OIL FILLED OPERATIONAL EQUIPMENT (REF. 112.7(K))

There are no oil filled operational equipment at this facility that is subject to SPCC requirements.

14. DISCHARGE PREVENTION- SPCC PROVISIONS FOR ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES) (REF 112.8(A))

This facility the general requirements of CFR 40, Part 112.7 and the specific discharge prevention and containment procedures listed in this section.

14.1 Facility Drainage (REF. 112.8 (b))

In general, petroleum product drainage at the facility is restrained by means of containment and or diversionary systems. Precipitation outside of the fueling containment areas will sheet flow in a northeasterly direction toward the catchment basins or off property into municipal storm water drainage systems.

14.2 Bulk Storage Containers (REF. 112.8 (c))

A listing of facility bulk storage tanks is provided in Section 2.3.1 of this Plan.

14.2.1 Construction (40 CFR 112.8 (c)(1))

All oil tanks used at this facility are constructed of steel, in accordance with industry specifications as described above. 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.

Fixed piping located on aboveground bulk storage tanks is made of steel and placed aboveground on appropriate supports designed to minimize erosion and stress.

14.2.2 Secondary Containment (40 CFR 112.8(c)(2))

The vertical aboveground storage tanks are located within a containment area that is constructed to provide secondary containment in excess of 110 percent of the largest single storage tank. The largest single storage tank has a shell capacity of 5,000 gallons. The containment area is designed to contain 24,361 gallons (net).

The horizontal aboveground storage tanks are located within a containment area that is constructed to provide secondary containment in excess of 110 percent of the largest single storage tank. The largest single storage tank has a shell capacity of 20,000 gallons. The containment area is designed to contain 90,442 gallons (net).

The loading rack lies on a concrete pad that is surrounded by a rollover berm. All transport tankers will park within this bermed area while being loaded and unloaded for the transfer of products out of the storage tanks. The pad is so constructed to provide containment of 110 percent of the largest single tanker compartment (3,000 gallons) utilizing the loading rack. The containment area is designed to contain 4,817 gallons (net).

The 1,000 gallon kerosene storage tank is located outside of the office. The tank is equipped with secondary containment. Spills from the oil tank would flow into the secondary containment portion of the system. The containment area is sized to contain 110 percent of the largest AST (1,000-gallon).

The 250 gallon waste oil tank is located outside of the office. The tank is equipped with secondary containment. Spills from the oil tank would flow into the secondary containment portion of the system. The containment area is sized to contain 110 percent of the largest AST (250-gallon).

The aboveground piping located in the loading/unloading area is provided with a catch basin that would contain incidental drips and spills during hose connection. Additionally the vehicle fueling dispenser is located upon the fueling pad and as such incidental spills would be contained thereon and controlled via application of absorbents.

Mobile/Portable containers in the form of 55-gallon drums, and totes are provided with appropriate containment in the form of sorbent materials and/or drainage into catchment basins. Any leak would be readily detected by facility personnel before it could cause a discharge to navigable waters or adjoining shorelines.

14.2.3 Drainage (40 CFR 112.8(c)(3))

All accumulated material is inspected to ensure no oil is discharged. Storm water periodically flows across the facility and discharges into the City of San Andreas municipal storm drainage or infiltrates into the ground.

14.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility

14.2.5 Partially Buried or Bunkered Storage Tanks (40 CFR 112.8(c)(5))

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility

14.2.6 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. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Additionally, visual inspections are performed on piping, valves, appurtenances, foundations, and supports to assess the equipment's fitness for continued service. The records of the results of testing are maintained at the facility and are available for review upon request. Table 3 indicates the inspection and testing schedule for the bulk containers located at HS.

Table 3: Scope and Frequency of Bulk Storage Containers Inspections and Tests

	Bulk Containers

Inspection/Test	STI Category 2 ASTs	Totes	Drums
Periodic visual inspection by facility personnel (as per STI Standard SP-001, see Appendix C)	Monthly	Monthly**	Weekly
External non-destructive integrity testing by certified inspector (as per STI Standard SP-001)	10 years	NA	EE
Leak test by owner or owners designee (as per STI Standard SP001)	10 years	NA	NA
Internal inspection by certified inspector (as per STI Standard SP-001)	NA	NA	NA

** As an alternative, if documentation is kept on-site for each portable container (tote) that indicates how long each container has been kept at the facility, then the owner's inspector is to complete only the STI SP001 Portable Container Inspection Checklist each month for containers on-site for 91 days or more.

EE: Environmental Equivalent, Inspection not required given use of environmentally equivalent measures (refer to Section 2.3 of this Plan).

14.2.7 Heating Coils (40 CFR 112.8(c)(7))

There are no tanks equipped with internal heating coils at this facility.

14.2.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))

Facility personnel are present throughout the filling operations to monitor the product level in the tanks. Tanks are gauged regularly by HS plant personnel. Tank gauge accuracy is verified and calibrated, if necessary, by HS personnel monthly. Storage drums are not refilled, and therefore overfill prevention systems do not apply.

14.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

There are no effluent treatment facilities subject to SPCC on the property.

14.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible oil leaks from sources such as tank seams, gaskets, rivets, and bolts sufficiently large to cause oil accumulations will be removed within 72 hours from the time the accumulations are discovered in accordance with the SPCC regulations.

14.2.11 Mobile and Portable Containers (55-gallon drums)

These bulk containers are located within an enclosed storage area. The containment device for this area consists of the sorbent materials and/or curbing to isolate spills. Due to the location of these containers within an enclosed area, no additional provisions have been made to contain precipitation.

15. FACILITY TRANSFER OPERATIONS, PUMPING AND FACILITY PROCESS (REF 112.8(d))

Transfer operations at this facility include:

- The transfer of oil into tanker trucks at the AST loading/unloading areas.
- The transfer of oil from the bulk storage tanks through aboveground piping to the drum and tote loading area.
- The transfer of oil from tanker trucks into ASTs

The facility has developed procedures for all personnel involved with facility loading/unloading operations.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Most of the aboveground piping is located within areas that are not accessible to vehicular traffic (e.g., inside diked area).

15.1 Procedures for Transferring Products

HS requires diesel delivery personnel and equipment to meet DOT requirements. A signed statement indicating that all delivery drivers meet DOT requirements and have been trained is available in the HS Corporate office.

Signs are posted warning drivers not to depart the area before disconnecting flexible transfer lines. Signs are posted reminding HS employees not to overfill fuel tanks.

15.2 Loading/Unloading Rack

The tanker transport loading and unloading rack construction and containment device are presented in Section 5 of this Plan. As discussed, spillage from loading and unloading area activities is directed to appropriate containment diversionary structures.

15.3 Procedures for Transferring Products

The facility has developed Loading/unloading procedures for the facility for all personnel involved with facility loading/unloading operations. Loading rack procedures are presented in Section 5 of this Plan. Specific procedures include the following:

15.3.1 Loading Area Procedures

1. If you are not cleared to load, check with the Operator. Do not load until you are cleared by the Plant Manager.
2. Once you are cleared to load, proceed to the loading area, observing other trucks waiting for the same area. Wait your turn to load.
3. Before pulling onto the loading pad, turn off all radios and electronic devices, check for ground cords in the roadway, standing or spilled product that must be washed down, and leaking loading arms. If you have any problems, notify the Plant Manager first before loading.
4. Pull onto the loading pad slowly and position truck to load product, set truck brakes and turn off engine.
5. Open all drainage valves to catchment basin (one in tank yard , one in catchment basin)
6. Attach ground cable to the truck and trailer.
7. Hook up vapor hose to truck and trailer (if equipped).
8. Load truck accordingly to rack instructions, observing all safety measures. Be sure to load the correct amount of product in each compartment so as to stay within weight limit of the truck.
9. After you are finished loading, disconnect truck in reverse order as you did when connecting.

15.3.2 Bulk Deliveries

1. Notify plant of date, time, product type and quantity to be delivered.
2. Park truck at the unloading headers. Check for broken seals.
3. Verify the tank to be filled has sufficient space to accept delivery.
4. If the tank ullage shown is not sufficient to take the full load, the driver shall contact the Plant Manager at the number listed. The driver shall wait for the Plant Manager to arrive prior to beginning delivery.
5. If the driver finds the bulk plant not ready to accept shipment, then the driver shall contact the Plant Manager and await his arrival before proceeding.

6. Failure of the plant equipment to operate properly or any other abnormal occurrence is to be immediately reported to the Plant Manager. If the Plant Manager or his alternate cannot be reached, report the problem to the dispatcher.
7. Check to be sure product tag on unloading header is the same as product in the truck and proceed as follows:
8. Open all drainage valves to catchment basin (one in tank yard , one in catchment basin)
9. Remove the unloading header cap and connect truck unloading hose.
10. Open truck valve, unloading header valve and start pump.
11. During unloading of truck, closely watch all operations to see that there are no leaks and that product is going into the correct tank and not overflowing. Under no circumstances is the driver to leave the unloading area or sit in the truck cab while unloading is progressing except to make the observations as noted.
12. If an overflow or spill occurs, the driver is to stop unloading at once. Follow the procedures outlined in Sections 3.2 and 3.3 of this Plan.
13. If it is discovered that any product is inadvertently pumped into the wrong tank (containing a different product) the driver will cease unloading and notify the Plant Manager immediately.
14. When the truck is empty, disconnect unloading hose at truck end and drain truck thoroughly into the 5-gallon bucket. Contents of the bucket can be poured into the hose directly or with the funnel. Make sure the bucket is in contact with the funnel or hose coupling (grounded) before pouring gasoline. No product should be left in the bucket. Disconnect and remove unloading hose and replace unloading header cap.
15. Close and lock unloading header valve if there is one.
16. Close all drainage valves to catchment basis (one in tank yard , one in catchment basis)
17. When ready to leave the plant, remove equipment from yard and lock gates.

15.4 Disconnections

Warning signs are provided in the Loading/Transfer Area to caution drivers departing before complete disconnection of flexible or fixed oil transfer lines.

15.5 Departures

Prior to filling and departure of any tank vehicle, the lower drain and all other outlets will be checked for leakage. Any problems will be corrected before departure.

15.6 Piping

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.

Piping systems at the facility are designed and operated in such a manner that the potential for oil spillage is minimal. To reduce corrosion, above ground piping is galvanized or painted. Buried piping is double walled. When buried piping is exposed, it is inspected for deterioration. If corrosion damage is found, additional examination and corrective actions will be taken. Piping which is not in service will be capped, valved or otherwise restrained to prevent oil spills. Piping supports are designed according to good engineering practice.

Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin. 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.