



# Preparing For an APSA Inspection Focusing on SPCC Plan Review

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Specialist III

Session Code Tu-G1

Tuesday, February 27<sup>th</sup>, 2024



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

Facility Submittal : Home » Submittal Search » Submittal: 1/3/2024 Print Submittal

Submittal: Jan. 3, 2024 10:54 AM

Facility Information Submitted Jan. 3, 2024 Set Submittal Status
Submitted for CERS ID [redacted] on 1/3/2024 10:54AM by [redacted]
Business Activities
Business Owner/Operator Identification

Hazardous Materials Inventory Submitted Jan. 3, 2024 Set Submittal Status
Submitted for CERS ID [redacted] on 1/3/2024 10:54AM by [redacted]
Hazardous Material Inventory (14)
Site Map (Official Use Only): Upload Document(s)

Emergency Response and Training Plans Submitted Jan. 3, 2024 Set Submittal Status
Submitted for CERS ID [redacted] on 1/3/2024 10:54AM by [redacted]
Emergency Response/Contingency Plan Upload Document(s)
Employee Training Plan: Provided Elsewhere in CERS

Aboveground Petroleum Storage Act Submitted Jan. 3, 2024 Set Submittal Status
Submitted for CERS ID [redacted] on 1/3/2024 10:54AM by [redacted]
APSA Facility Information
Aboveground Petroleum Storage Act Documentation: Provided Elsewhere in CERS
Download EDT Regulator Facility Submittal XML Package Submittal Search



APSA Facility Information: Home » Submittal Search » Submittal: 1/3/2024 » APSA: APSA Facility Information (Submitted)

Submittal Element History
Submitted for CERS ID [redacted] on 1/3/2024 8:27AM by [redacted]

Facility Information
Conditionally Exempt No
Total Aboveground Storage Capacity of Petroleum 38685
Number of Tanks in Underground Area(s) 0
Date of SPCC Plan Certification or Date of 5-Year Review 11/30/2023
Created By: [redacted] Last Updated By: [redacted] Return to Submittal

# California Health & Safety Code Division 20 Chapter 6.67 AKA Aboveground Petroleum Storage Act (APSA)

APSA requires owners and operators of tank facilities to prepare and implement an SPCC Plan in accordance with 40 CFR Part 112.



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# What Plan Can They Use?

Tier I – The aggregate aboveground oil storage capacity of the facility is 10,000 gallons or less, no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons, and no single discharge exceeding 1,000 gallons and no two discharges each exceeding 42 gallons within any twelve-month period in the three years prior to the SPCC plan.

Tier II – The aggregate aboveground oil storage capacity of the facility is 10,000 gallons or less. Has a single tank or container with a capacity greater than 5,000 gallons. and no single discharge exceeding 1,000 gallons and no two discharges each exceeding 42 gallons within any twelve-month period in the three years prior to the SPCC plan. Portions of the plan may need to be certified by a Professional Engineer (PE) (example environmental equivalence or impracticability statement).

PE Certified – The aggregate aboveground oil storage capacity of the facility is greater than 10,000 gallons and the SPCC Plan must be certified by a PE.





# SPCC Plan Templates

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

|                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Sections I, II, and III:</b> Required for all Tier I qualified facilities                                                                                                                                           |
| <b>Section A:</b> Onshore facilities (excluding production)                                                                                                                                                            |
| <b>Section B:</b> Onshore oil production facilities (excluding drilling and workover facilities)                                                                                                                       |
| <b>Section C:</b> Onshore oil drilling and workover facilities                                                                                                                                                         |
| <b>Attachments:</b> 1 - Five Year Review and Technical Amendment Logs<br>2 - Oil Spill Contingency Plan and Checklist<br>3 - Inspections, Dike Drainage and Personnel Training Logs<br>4 - Discharge Notification Form |

APSA is **Green**

**Orange** and **Yellow** are not APSA

**Light Blue** – Required

**Green** – Required

**Orange** – Not APSA

**Yellow** – Not APSA



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February 26-29, 2024



# SPCC Guidance for Regional Inspectors

Office of  
Emergency  
Management

December 16, 2013



EPA 550-B-13-002

APRIL 12, 2021

## ABOVEGROUND PETROLEUM STORAGE ACT (APSA) PROGRAM GUIDANCE DOCUMENT



CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION  
OFFICE OF THE STATE FIRE MARSHAL

## Summary of SPCC Rule Requirements & SPCC Plan Elements (40 CFR 112)

### Section 112.1 – General applicability of the SPCC rule

- Describes equipment, oils, and facilities subject to as well as exempt from the SPCC rule
- Describes/references the criteria for harmful discharges to navigable water [112.1(b)]
- Describes the purpose of SPCC Plans [112.1(e)]

### Section 112.2 – Definitions

- Definition of terms used in the SPCC rule (some terms defined or clarified in other SPCC rule sections; e.g. qualified facilities, non-transportation-related tank truck, etc.)

### Section 112.3 – Requirement to prepare an SPCC Plan

- Compliance dates/deadlines for various facility types [112.3(a)-(b)]
- PE review and certification requirements [112.3(d)]
- Required SPCC Plan locations [112.3(e)]
- Time extensions granted by US EPA RA [112.3(f)]
- Qualified facilities [112.3(g)]

### Section 112.4 – Amendment of SPCC Plan by US EPA Regional Administrator

- Information and SPCC Plan submittal requirements to US EPA RA and state/local agencies after certain discharges [112.4(a)-(c)]
- Requirement to amend the SPCC Plan if required by US EPA RA [112.4(d)-(f)]

### Section 112.5 – Amendment of SPCC Plan by facility owner/operator

- Required SPCC Plan amendment and implementation after changes [112.5(a)]
- 5-year review and evaluation by owner/operator and implement amendments [112.5(b)]
- Required PE certification of any technical amendments [112.5(c)]

### Section 112.6 – Qualified facilities

- Specific requirements unique to Tier I qualified facilities and reference to 112.7 and 112.8 requirements applicable to Tier I qualified facilities [112.6(a)]
- Specific requirements unique to Tier II qualified facilities and reference to 112.7 and 112.8 requirements applicable to Tier II qualified facilities [112.6(b)]

### Section 112.7 - General requirements (for SPCC Plans) for all facilities

- Management commitment, SPCC Plan format, and deferred equipment or procedure requirements [112.7]
- Discussion of facility conformance to the SPCC rule [112.7(a)(1)]
- Environmental equivalence – Conditionally allow deviations from specific sections and requirements with equivalent/alternative means [112.7(a)(2)]
- Facility description and diagram [112.7(a)(3)]
- Type of oil and storage capacity of each container [112.7(a)(3)(i)]
- Discharge prevention measures including procedures for routine handling of oil [112.7(a)(3)(ii)]
- Discharge/drainage controls including secondary containment and discharge control procedures [112.7(a)(3)(iii)]
- Countermeasures for discharge discover, response, and cleanup [112.7(a)(3)(vi)]
- Disposal methods for recovered materials [112.7(a)(3)(v)]
- Emergency response/notification contact list and phone numbers [112.7(a)(3)(vi)]
- Information and procedures for discharge reporting [112.7(a)(4)]
- Organization of discharge procedures in SPCC Plan so readily useable in an emergency [112.7(a)(5)]
- Spill predictions and associated equipment failure descriptions (discharge direction, rate of flow, quantity of oil, etc.) [112.7(b)]

## Summary of SPCC Rule Requirements and SPCC Plan Elements

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- Requirements and standards for containment and/or diversionary structures; general containment for most likely release/discharge; examples of containment/diversionary structures [112.7(c)]
- Impracticability determination – Explanation and alternate requirements for secondary containment [112.7(d)]
- Inspections/tests procedures and records requirements [112.7(e)]
- Personnel training and discharge prevention briefings [112.7(f)]
- Facility security [112.7(g)]
- Facility tank car and tank truck loading/unloading rack requirements [112.7(h)]
- Brittle fracture evaluation after repair, alteration, reconstruction, or change in service for field-erected tanks [112.7(i)]
- Discussion requirements for conformance to applicable requirements and other more stringent federal, state, or local requirements [112.7(j)]
- Conditional alternative requirements for general secondary containment for qualified oil-filled operational equipment [112.7(k)]

### Section 112.8 – SPCC Plan requirements for onshore facilities

- Requirement to meet the 112.7 general requirements and the 112.8 specific discharge prevention and containment requirements [112.8(a)]
- Facility drainage restrictions, required procedures, and methods [112.8(b)(1) – (5)]
- Bulk storage container compatibility with stored materials and conditions [112.8(c)(1)]
- Requirements and standards for sized secondary containment for bulk storage containers and tanks (100% capacity plus precipitation freeboard) [112.8(c)(2)]
- Requirements for and limitations on drainage of uncontaminated rainwater from diked areas [112.8(c)(3)]
- Corrosion protection requirements for buried or partially buried/bunkered metallic storage tanks [112.8(c)(4)&(5)]
- Specific requirements and examples of regular or periodic integrity testing or inspection of each tank or container; determination of methods and qualifications in accordance with industry standards; test/inspection recordkeeping, including comparison records [112.8(c)(6)]
- Controlling leaks from/through internal heating coils [112.8(c)(7)]
- Engineer/update container installation in accordance with good engineering practice; specific allowable and required methods for overflow prevention and testing of liquid level sensing devices [112.8(c)(8)]
- Effluent treatment facility observation requirement [112.8(c)(9)]
- Prompt correction of visible discharges from containers and components; removal of accumulations of oil in diked areas [112.8(c)(10)]
- Required position/locating of portable and mobile containers and tanks to prevent a discharge to navigable waters; required sized secondary containment (except for mobile refuelers and non-transportation tank trucks) [112.8(c)(11)]
- Protective wrapping/coating requirements for buried pipping and inspections if uncovered or exposed [112.8(d)(1)]
- Out of service or standby terminal connection requirements [112.8(d)(2)]
- Design requirement for pipe supports – minimize abrasion/corrosion, allow for expansion/contraction [112.8(d)(3)]
- Regular inspection of aboveground valves, piping, and appurtenances and integrity and leak testing of buried piping when installed, modified, relocated, replaced, etc. [112.8(d)(4)]
- Warning vehicles to prevent endangerment of piping and oil transfers [112.8(d)(5)]

SPCC CROSS-REFERENCE

| Provision           | Plan Section                                   | Page          |
|---------------------|------------------------------------------------|---------------|
| 112.1               | Introduction .....                             | 1             |
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| 112.7(a)(3)         | Plan Requirements - Map .....                  | Appendix A    |
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| 112.8(c)(9)         | Treatment Facilities .....                     | 11            |
| 112.8(c)(10)        | Inspections and Records .....                  | 8             |
| 112.8(c)(11)        | Mobile Containers .....                        | 11            |
| 112.8(d)(1)         | Piping Description .....                       | 8             |
| 112.8(d)(2)         | Security .....                                 | 10            |
| 112.8(d)(3)         | Piping Description .....                       | 8             |
| 112.8(d)(4)         | Piping Description .....                       | 8             |
| 112.8(d)(5)         | Piping Description .....                       | 8             |
| 112.20              | Introduction (Substantial Harm Criteria).....  | 1, Appendix E |

112.7 - You must prepare a Plan in accordance with good engineering practices. If you do not follow the sequence specified in this section for the plan, you must Prepare an equivalent Plan that meets all of the applicable requirements and supplement it with a section cross-referencing the location of requirements listed in this part.

# Spill Prevention, Control, and Countermeasure Plan

Operations and Control Center  
California

Prepared for:

March 2022  
022006

Phone:

# Spill Prevention, Control, and Countermeasure Plan

Operations and Control

Center

, California

Prepared for:

Operations and Control Center

Prepared by:

March 2022

QA/QC: MXK\_\_  
Reference: 022006



## Spill Response and Reporting

### What to Do in Case of a Spill

*Do Not Become A Victim*

### Training

- Spill response must be performed by appropriately trained personnel
- Operating personnel may respond to minor non-hazardous spills
- Hazardous spills require the appropriate level of HAZWOPER training

### First

#### If there is an immediate danger:

- leave the area immediately;
- contact your supervisors, and they will call 911; and
- take measures to prevent others from entering area.

#### If there is no immediate danger:

- call a supervisor;
- evaluate source of spill;
- if the spill can be stopped safely (for example, by closing a shutoff valve) and you are appropriately trained, stop the spill—if not, wait for help.

### After Immediate Action Has Been Taken

#### 1. Evacuate non-essential personnel from danger:

- Immediately notify any people that may be in harm's way of pending danger due to the spill.
- Evacuate to a location upwind of the spill area. Take roll to account for all site personnel.
- Assist those that require help to avoid risk from spilled materials, chemicals, or possible burn, fire, or explosion hazard.
- Stay away from the scene of the spill until the "ALL CLEAR" has been issued by your supervisor or other authorized person.

#### 2. Isolate the source of the spill:

- Where possible, stop the source of the spill.
- Turn off pumps, close shut-off valves, upright toppled containers, or take other appropriate steps to limit further release to the environment.
- Eliminate ignition sources whenever flammable vapors are suspected.

#### 3. Contain the spill:

- Limit the area impacted by a spill with earthen berms, trenches, or any available absorbent materials.
- Isolate spill-contaminated areas from vehicular traffic until remediation is complete.
- Block any affected storm drains, drop inlets, or sewer inlets.

### Reporting a Spill

- Notify your Supervisor immediately.
  - You should be ready to provide the relevant facts regarding the incident.
- Your Supervisor will then determine what (if any) additional notifications are required.

For all spills **over 5 gallons**, one of the following personnel **MUST** be notified immediately. For **ANY** spill to a water body (including exposed ground water in pits, ponds, streams, or dry stream beds), one of the following personnel must be notified immediately. Telephone numbers are provided for [REDACTED] Municipal Water District's Emergency Contacts, below.

|            |                                 |                    |                  |
|------------|---------------------------------|--------------------|------------------|
| [REDACTED] | District Superintendent         | Office: [REDACTED] | Cell: [REDACTED] |
| [REDACTED] | District Operations Supervisor  | Office: [REDACTED] | Cell: [REDACTED] |
| [REDACTED] | District Maintenance Supervisor | Office: [REDACTED] | Cell: [REDACTED] |

Reporting the spill to the appropriate agencies is the responsibility of one of these personnel.

### Complete the Spill Report Form

- Document any spill incident on the Spill Report Form in **Appendix 2** as soon as possible after the spill.
- Spill Reports should be submitted to the District Superintendent **within 24 hours** of the occurrence of a spill incident.

### Remediating a Spill

- The Owner/Operator will determine the appropriate steps to mitigate a spill incident. This may involve excavation and/or treatment of spill-contaminated materials. Follow-up actions will also be detailed on the spill report.

### Emergency Contacts

|            |                                 |                    |                  |
|------------|---------------------------------|--------------------|------------------|
| [REDACTED] | District Superintendent         | Office: [REDACTED] | Cell: [REDACTED] |
| [REDACTED] | District Operations Supervisor  | Office: [REDACTED] | Cell: [REDACTED] |
| [REDACTED] | District Maintenance Supervisor | Office: [REDACTED] | Cell: [REDACTED] |



**Agency Spill Notification Requirements**

| Agency                                                                                 | Phone Number         | Contact                                                                       | Type of Notification | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------|----------------------|-------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Local<br>County Division of Environmental Health                                       | 911 (24-hour number) |                                                                               | Verbal               | Immediately notify HCDEH of any oil spill of 42 gallons or more, or a spill of any size that has the potential for injury or environmental impact.                                                                                                                                                                                                                                                                                                           |
| Police                                                                                 | 911                  |                                                                               | Written              | Submit written report to the agency within 5 working days of a spill or release to waters of the state.                                                                                                                                                                                                                                                                                                                                                      |
| Fire Department                                                                        | 911                  |                                                                               |                      | If support is needed.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| State<br>California Emergency Management Agency (Cal EMA)<br>Local Sheriff's Dept./OES |                      |                                                                               | Verbal               | If support is needed.                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                                        |                      |                                                                               | Written              | Immediately notify Cal EMA of the following:<br><ul style="list-style-type: none"> <li>Any oil spill of 42 gallons or more, including spills that remains on facility property;</li> <li>Any oil spill of any quantity to waters of the state.</li> </ul> Submit a written follow-up report as soon as possible but no later than 30 days following emergency response. Use <i>Emergency Release Follow-up Notice Reporting Form</i> provided in Appendix 2. |
| Federal<br>National Response Center (NRC)                                              | (800) 424-8802       |                                                                               | Verbal               | Notify the NRC of the following:<br><ul style="list-style-type: none"> <li>Any spill that creates a sheen on water, per 40 Code of Federal Regulations 110.3.</li> <li>Any spill that equals or exceeds CERCLA* Federal Reportable Quantities.</li> </ul> NRC will notify the local EPA <sup>5</sup> or USCG <sup>6</sup> in jurisdiction where spill occurred, as appropriate.                                                                              |
| U.S. Environmental Protection Agency, Region 9 Oil Program                             |                      | Peter Reich<br>(tel:hpeter@epa.gov) or Mark Calhoun<br>(calhoun.mark@epa.gov) | Written              | If Facility has 2 discharges of over 42 gallons each, in a 12-month period, or one release of >1,000 <sup>4</sup> gallons; the facility must submit its spill prevention, control, and countermeasure plan to the EPA for review, per 40 Code of Federal Regulations 112.4.                                                                                                                                                                                  |

\* CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act  
<sup>4</sup> EPA: U.S. Environmental Protection Agency  
<sup>5</sup> USCG: U.S. Coast Guard  
<sup>6</sup> -, greater than

**Emergency Notifications**

Notifications to state and/or federal authorities may only be made with authorization from the general manager.

- A. Fire Department 911
- B. California Emergency Management Agency (Cal-EMA) [REDACTED]
  - Immediately notify Cal-EMA of the following:
    - Any oil spill of 42 gallons or more, including spills that remain on facility property.
    - Any oil spill of any quantity to waters of the state.
  - Submit written report to Cal-EMA within 5 working days of a spill or release outside of secondary containment. Use the Reporting Form in Appendix 2.
- C. [REDACTED] Division of Environmental Health [REDACTED]
  - As the Certified Unified Program Agency (CUPA), the Health Department must be notified of any incident that triggers implementation of site's spill response plan.
  - Submit written incident report to the [REDACTED] County Division of Environmental Health [REDACTED] within 15 days of any hazardous materials incident that requires implementation of the spill response plan.
- D. U.S. Environmental Protection Agency (EPA)—National Response Center (800) 424- 8802
  - If a spill impacts (causes a sheen) the waters of the United States, the spill must be reported to the National Response Center as soon as possible.

And if appropriate notify:

- E. California Highway Patrol 911
  - All releases on-highway
- F. Department of Toxic Substance Control (800) 728-6942  
California State Main Office
  - All hazardous waste tank releases
- G. City of [REDACTED] [REDACTED]
  - If a spill enters the City's storm drain system

The following information is required when you notify the state:

- Identity of caller
- Location, date and time of spill, release, or threatened release
- Substance and quantity involved
- Chemical name
- Description of what happened

[REDACTED]

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## Log of Plan Review and Amendments

### Non-Technical Amendments

Non-technical amendments are not certified by a Professional Engineer.

Examples of changes may include, but are not limited to, phone numbers, name changes, any non-technical text change(s), and any facility reconfiguration that facility management determines does not materially affect the facility's potential to discharge oil.

### Technical Amendments

Technical amendments are certified by a Professional Engineer (§112.5(c)).

Amend the SPCC plan when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge.

Examples of changes may include, but are not limited to, commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacements, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or addition/deletion of standard operation or maintenance procedures at the facility. It is the responsibility of the facility to determine, and confirm with the regulatory authority as necessary, what constitutes a technical amendment. The preamble of the rule states that an amendment is required only "when there is a change that materially affects the facility's potential to discharge oil" (67 FR 47091).

An amendment made under this section will be prepared within six (6) months of the change and implemented as soon as possible but not later than six (6) months following preparation of the amendment.

Technical amendments affecting various pages within the plan can be PE-certified on those pages, certifying those amendments only, and will be documented on the log form below.

### Management Review

Management will review this SPCC plan at least every five (5) years and document the review on the form below (§112.5(b)).

| Review/<br>Amendment<br>Date | Signature | Amendment<br>Required?<br>(Y/N) | Description of<br>Amendment, if<br>Required | Affected<br>Page(s) | PE Certification<br>Required? (Y/N) |
|------------------------------|-----------|---------------------------------|---------------------------------------------|---------------------|-------------------------------------|
| September 21,<br>2016        |           | --                              | SPCC original                               | all                 | Y                                   |
| March 30, 2022               |           | Y                               | Technical Amendment                         | all                 | Y                                   |



## Abbreviations and Acronyms

### Units of Measure

< less than  
MW Mega Watt

### Additional Terms

AST aboveground storage tank  
CAL FIRE California Department of Forestry and Fire Protection  
CFR Code of Federal Regulations  
DOT U.S. Department of Transportation  
EC Safety and Environmental Coordinator  
EPA U.S. Environmental Protection Agency  
FEI formal external inspection  
FM Facility Manager  
FR Federal Register  
FRP facility response plan  
[REDACTED]  
NFPA National Fire Protection Association  
NOAA National Oceanic and Atmospheric Administration  
NPDES National Pollutant Discharge Elimination System  
NR no reference  
SPCC spill prevention, control, and countermeasure  
STI Steel Tank Institute  
USGS United States Geological Survey

[REDACTED]

[REDACTED]

## Management Approval

This spill prevention, control, and countermeasure plan (SPCC) has been prepared by [REDACTED]  
[REDACTED] Operations and Control Center located at [REDACTED]

Owner/Operator responsible for Facility:

[REDACTED]  
[REDACTED]  
[REDACTED]

This SPCC plan has the full approval of management at a level with authority to commit the necessary manpower, equipment, and resources to fully implement the plan. This SPCC plan will be implemented as described herein and will be reviewed and evaluated at least once every five years (per 40 Code of Federal Regulations (CFR) Part 112.5).

Signature [REDACTED]  
[REDACTED], District Superintendent

Date 4-1-22

[REDACTED]

[REDACTED]



## Professional Engineer Certification

Facility Name: [REDACTED] Operations and Control Center  
Facility Address: [REDACTED]

By means of this Professional Engineer Certification, I hereby attest to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this plan has been prepared in accordance with the requirements of this Part.
- My agent or I have visited and examined the facility(s).
- I have verified that this plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards.
- I have verified that the required inspection and testing procedures have been established as described in Sections 11.0 and 17.5.
- I have verified that the plan is adequate for the facility.



(Seal)

[REDACTED]  
Printed Name of Registered Professional Engineer

[REDACTED]  
Signature of Registered Professional Engineer

Date: 04/04/2022      Registration No.: 78956      State: CA



## 1.0 Introduction and Applicability-40 CFR 112.1(d)

In 1973, the U.S. Environmental Protection Agency (EPA) issued the Oil Pollution Prevention Regulation, which is codified in Title 40 of the Code of Federal Regulations (CFR) Part 112, to address the oil spill prevention provisions contained in the Clean Water Act of 1972. The regulation forms the basis of the EPA's oil spill prevention, control, and countermeasures (SPCC) program, which seeks to prevent oil spills from certain aboveground and underground storage tanks discharging to the navigable waters of the United States.

The regulation was amended in 2010, requiring that a facility incorporate elements of the new regulations into its SPCC plan prior to November 2011. The EPA issued this extended compliance deadline to update SPCC plans, incorporate the new requirements, and begin implementation of the program. In particular, the regulation applies to non-transportation-related facilities that:

- have an aggregate aboveground storage capacity of more than 1,320 gallons; and
- could reasonably be expected to discharge oil in harmful quantities into navigable waters of the United States.

The [REDACTED] Operations and Control Center [REDACTED] facility is considered a regulated facility because it has an aggregate aboveground oil storage capacity of more than 1,320 gallons and is in close proximity to the [REDACTED] which meets the definition of a navigable waterway. Title 40 CFR 112 requires each owner or operator of a regulated facility to prepare an SPCC plan. An SPCC plan is required to address the facility's design, operation, and maintenance procedures established to prevent spills from occurring, as well as countermeasures to control, contain, clean up, and mitigate the effects of an oil spill that could affect navigable waters. This plan is a detailed written description of how the facility operations comply with the guidelines of the Oil Pollution Prevention Regulations. The format of this SPCC plan follows the sequence of 40 CFR 112.

All owners or operators of non-transportation-related oil storage facilities must complete a Certification of the Applicability of the Substantial Harm Determination and maintain the certification form with the SPCC plan. If a facility meets the substantial harm criteria, the owner or operator must prepare a facility response plan (FRP) prior to beginning operation (40 CFR 112.20).

As indicated by the certification provided in Appendix 1, the facility does not meet the substantial harm criteria and, therefore, does not require an FRP.

## 2.0 General Facility Information

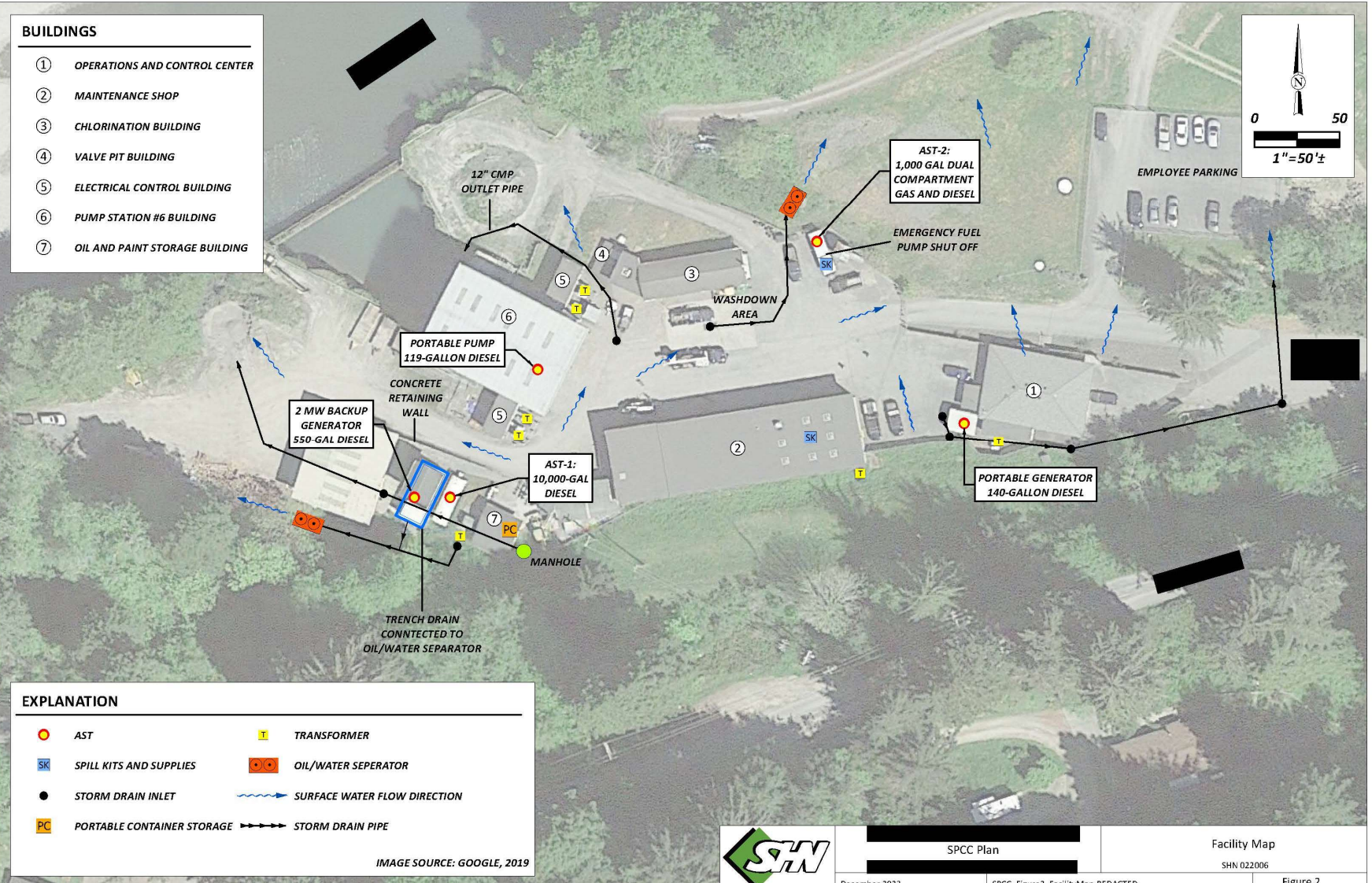
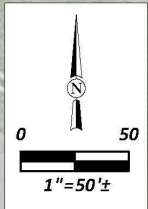
The [REDACTED] facility is located at [REDACTED]. The facility is located at latitude [REDACTED]° north, longitude [REDACTED]° west. The facility is situated south of U.S. Highway [REDACTED] and north of [REDACTED]. The site is situated south of and adjacent to the [REDACTED]. The [REDACTED] flows northwest for several miles before emptying into the [REDACTED] north of the community of [REDACTED].

Regional topography and drainage patterns are shown on Figure 1, and the Facility Site Map is shown on Figure 2.



**BUILDINGS**

- ① OPERATIONS AND CONTROL CENTER
- ② MAINTENANCE SHOP
- ③ CHLORINATION BUILDING
- ④ VALVE PIT BUILDING
- ⑤ ELECTRICAL CONTROL BUILDING
- ⑥ PUMP STATION #6 BUILDING
- ⑦ OIL AND PAINT STORAGE BUILDING



**EXPLANATION**

- |                            |                              |
|----------------------------|------------------------------|
| AST                        | TRANSFORMER                  |
| SPILL KITS AND SUPPLIES    | OIL/WATER SEPARATOR          |
| STORM DRAIN INLET          | SURFACE WATER FLOW DIRECTION |
| PORTABLE CONTAINER STORAGE | STORM DRAIN PIPE             |

IMAGE SOURCE: GOOGLE, 2019



|                                   |  |              |
|-----------------------------------|--|--------------|
| SPCC Plan                         |  | Facility Map |
| December 2023                     |  | SHN 022006   |
| SPCC_Figure2_FacilityMap-REDACTED |  | Figure 2     |

P:\GIS\PROJ\_1\IND\SPCC\_Figure2\_FacilityMap-REDACTED.mxd User: mrose DATE: 12/14/23 9:40AM



## 2.1 Description of Facility Operations

The [redacted] has operated the site as the [redacted] facility since [redacted]. The [redacted] pumps groundwater from below the [redacted] for domestic water supply to the [redacted], and [redacted] of [redacted], and [redacted]. The [redacted] also delivers [redacted] use to the [redacted].

The [redacted] operates and maintains two petroleum aboveground storage tanks (ASTs) at the facility. A 10,000-gallon AST, added in 2002, provides diesel fuel for the two-megawatt backup generator and is located adjacent (southeast) to the generator. The dual-compartment 1,000-gallon AST holds a maximum of 250 gallons of unleaded gasoline and a maximum of 750 gallons of diesel fuel, which provide fuel to district vehicles.

A 2-Mega-Watt (MW) backup generator with a 550-gallon diesel fuel tank, a 140-gallon portable generator, and a 119-gallon portable pump are each equipped with a double-walled fuel tank located underneath the equipment. Additional bulk oil storage includes 55-gallon portable containers stored in the Oil and Paint Building. Maintenance activities occurring at the facility include heavy equipment and operational machine service.

Oil-filled electrical equipment in use at the facility includes two 523-gallon transformers, two 202-gallon transformers, two 123-gallon transformers, and a 584-gallon transformer.

## 2.2 Designated Person(s) Accountable for Oil Spill Prevention at the Facility

|                                            |                     |
|--------------------------------------------|---------------------|
| [redacted] District Superintendent         |                     |
| During Business Hours:                     | [redacted] (office) |
| After Business Hours:                      | [redacted] (cell)   |
| [redacted] District Operations Supervisor  |                     |
| During Business Hours:                     | [redacted] (office) |
| After Business Hours:                      | [redacted] (cell)   |
| [redacted] District Maintenance Supervisor |                     |
| During Business Hours:                     | [redacted] (office) |
| After Business Hours:                      | [redacted] (cell)   |

Oil-filled electrical equipment in use at the facility includes two 523-gallon transformers, two 202-gallon transformers, two 123-gallon transformers, and a 584-gallon transformer.

## 3.0 Amendments to Plan Required by the Regional Administrator-40 CFR 112.4

If a facility has discharged more than 1,000 U.S. gallons of oil in a single event, or more than 42 U.S. gallons of oil twice within a 12-month period, the facility will submit documentation to the EPA (Regional Administrator). This documentation shall include the following information:

- Facility name
- Name of person who is reporting
- Facility location
- Maximum storage capacity of the facility and normal daily throughput

- Corrective action and countermeasures taken, including description of equipment repairs and replacement
- Adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary
- The cause of the discharge including a failure analysis of the system or subsystem in which the failure occurred
- Additional preventive measures taken or completed to minimize the possibility of recurrence
- Other information the Regional Administrator may reasonably require pertinent to the SPCC plan or discharge

The Regional Administrator may then require the facility to amend its SPCC plan. The facility has had no reported release or spill of petroleum products that meets the above criteria.

#### 4.0 Amendments to Plan by Owner—40 CFR 112.5

Facility management will conduct a review of this SPCC plan at a minimum of once every 5 years. Any amendments to this plan will be documented on the "Log of Plan Review and Amendments" form at the beginning of this plan. Minor changes, such as clerical errors, personnel changes, or other contact information, may be changed by management.

Any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of oil requires that the SPCC plan be modified within 6 months to reflect the change. The amended plan must be certified by a licensed Professional Engineer. Such amendments shall be fully implemented as soon as possible but not later than 6 months following preparation of the amendment. The "Log of Plan Review and Amendments" form will be used to track the revisions to the plan.

#### 5.0 Spill History

Under California and federal laws and regulations, there are distinct and different spill reporting requirements and thresholds summarized below. A reportable spill is any spill satisfying at least one of the following criteria:

- spill to navigable waters (any quantity);
- causes a sheen, sludge, or emulsion on the surface of the water or adjoining shorelines;
- two, 42-gallon spills in 12 months or one, 1,000 gallon or larger spill that reaches navigable waters or adjoining shorelines;
- any release that poses a significant hazard to human health and safety, property, or the environment;
- any oil spill of 42 gallons or more, including spills that remain on facility property; or
- violates an applicable water quality standard.<sup>1</sup>

<sup>1</sup> Water quality standards consist of three core components. These include designated uses of a water body, criteria to protect designated uses, and antidegradation requirements to protect existing uses and high quality/high value waters (EPA, 2013).

The facility had no reportable spill during the past 12 months. Any spills that are not reportable (for example, do not pose a threat to human health or the environment, are generally less than 10 gallons of oil, are easily stopped and controlled at the time of discharge, and are not likely to reach water) should be documented in a spill log maintained by the District Superintendent.

The facility has not discharged more than 1,000 U.S. gallons of oil in a single discharge event, as described in 40 CFR §112.1(b). Furthermore, the facility has not discharged more than 42 U.S. gallons of oil in each of two discharge events, as described in 40 CFR §112.1(b), occurring within any 12-month period.

Discharge events described in 40 CFR §112.1(b) include (but are not limited to) discharges of oil into or upon the navigable waters of the U.S. or adjoining shorelines, or into or upon the waters of the contiguous zone, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States. If such discharge(s) occur, the facility owner is to submit information about the discharge(s) to the EPA Regional Administrator within 60 days as prescribed by 40 CFR §112.4(a).

#### 6.0 Overview of Facility Oil Storage—40 CFR 112.7(a)(3)

At the facility, oil is contained in several aboveground storage tanks (ASTs), portable containers, 55-gallon drums, and oil-filled electrical equipment. Bulk oil storage capacities, contents, locations, and materials of construction are summarized in Table 1. The locations of the storage areas are illustrated on Figure 2.

**Table 1. Summary of Bulk Oil Storage Containers**  
[REDACTED] California

| Tank ID             | Capacity (gallons) | Contents                                  | Type                                           | Location                                                       | Sized Secondary Containment |
|---------------------|--------------------|-------------------------------------------|------------------------------------------------|----------------------------------------------------------------|-----------------------------|
| AST-1 <sup>a</sup>  | 10,000             | Diesel                                    | Double-wall Steel                              | East of and adjacent to 2MW Generator                          | Yes                         |
| AST-2               | 1,000              | Gasoline (250-gallon) Diesel (750-gallon) | Double-wall Steel (dual compartment)           | East of Chlorination Building                                  |                             |
| 2MW Generator       | 550                | Diesel                                    | Double-wall Steel                              | West of and adjacent to AST-1                                  | Yes                         |
| Portable Generator  | 140                | Diesel                                    | Double-wall Steel                              | West of and adjacent to Operations and Control Center Building | Yes                         |
| Portable Pump       | 119                | Diesel                                    | Double-wall Steel                              | Adjacent to Pump Station #6 Building                           | Yes                         |
| Portable Containers | 55                 | Various oils                              | DOT <sup>b</sup> steel drums polyethylene tote | Oil and Paint Storage Building                                 | Yes                         |

<sup>a</sup> AST: aboveground storage tank

<sup>b</sup> DOT: U.S. Department of Transportation

|                     |    |              |                                                |                                |     |
|---------------------|----|--------------|------------------------------------------------|--------------------------------|-----|
| Portable Containers | 55 | Various oils | DOT <sup>b</sup> steel drums polyethylene tote | Oil and Paint Storage Building | Yes |
|---------------------|----|--------------|------------------------------------------------|--------------------------------|-----|

[REDACTED]

[REDACTED]

## 7.0 General Spill Prevention Controls and Countermeasures—40 CFR 112.7

Preventing oil spills and keeping releases from reaching navigable waters are inherent features in the design of the facility, its drainage systems, and the facility's operational procedures. These operational procedures include precautionary measures to prevent anticipated overfills, unexpected discharges (due to equipment failure), as well as spills while servicing equipment and machinery.

This SPCC plan identifies first responder emergency actions, in-house spill reporting and documentation procedures, and external (agency) notifications that are required in the event of a regulated spill or release. A spill report form is provided in Appendix 2 of this SPCC plan. The emergency response plan and emergency notification contacts for HBMWWD personnel and regulatory agency personnel are summarized in the front of this SPCC plan.

## 8.0 Prediction of Spill Characteristics—40 CFR 112.7(b)

Potential releases from the containers and associated ancillary equipment located at the facility are described in Table 2. For each type of potential equipment failure, a prediction of the direction, rate of flow, and total quantity of oil that could be discharged are provided.

**Table 2. Potential Spill Scenarios**  
[REDACTED], California

| Source                         | Type of Failure      | Volume <sup>a</sup><br>(gallons) | Rate of Flow<br>(gallons per<br>minute) | Direction of Flow <sup>b</sup><br>Method of<br>Containment                         |
|--------------------------------|----------------------|----------------------------------|-----------------------------------------|------------------------------------------------------------------------------------|
| <b>Bulk Storage Containers</b> |                      |                                  |                                         |                                                                                    |
| AST-1                          | Dispensing from pump | <1 <sup>d</sup> to 5             | <1 to 5                                 | Into trench drain and into oil water separator or onto surrounding vegetation      |
|                                | Transfers to tank    | <50 to 1,000                     | <50 to 1,000                            |                                                                                    |
|                                | Tank rupture         | 10,000                           | <1 to 10,000                            | Into sized secondary containment                                                   |
| AST-2                          | Dispensing from pump | <1 to 5                          | <1 to 5                                 | Onto concrete slab and onto surrounding vegetation                                 |
|                                | Transfers to tank    | <25 to 500                       | <25 to 500                              |                                                                                    |
|                                | Tank rupture         | 1,000                            | <1 to 1,000                             | Into sized secondary containment                                                   |
| 2MW Generator                  | Dispensing from pump | <1 to 5                          | <1 to 5                                 | Into sized secondary containment or into trench drain and into oil water separator |
|                                | Transfers to tank    | <10 to 50                        | <10 to 50                               |                                                                                    |
|                                | Tank rupture         | 550                              | <1 to 550                               |                                                                                    |



**Table 2. Potential Spill Scenarios**, California

| Source                                  | Type of Failure         | Volume <sup>a</sup><br>(gallons) | Rate of Flow<br>(gallons per<br>minute) | Direction of Flow <sup>b</sup><br>Method of<br>Containment                                                             |
|-----------------------------------------|-------------------------|----------------------------------|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Portable<br>Generator                   | Dispensing from<br>pump | <1 to 5                          | <1 to 5                                 | Into sized secondary<br>containment or onto<br>concrete slab and<br>surrounding<br>vegetation; spill kits<br>available |
|                                         | Transfers to tank       | <10 to 50                        | <10 to 50                               |                                                                                                                        |
|                                         | Tank rupture            | 140                              | <1 to 140                               |                                                                                                                        |
| Portable Pump                           | Dispensing from<br>pump | <1 to 5                          | <1 to 5                                 | Into sized secondary<br>containment or onto<br>concrete floor; spill<br>kits available                                 |
|                                         | Transfers to tank       | <1 to 15                         | <1 to 15                                |                                                                                                                        |
|                                         | Tank rupture            | 119                              | <1 to 119                               |                                                                                                                        |
| Portable<br>Containers                  | Dispensing              | <1 to 3                          | <1 to 3                                 | Into sized secondary<br>containment area<br>(concrete floor<br>inside building) or<br>spill pallet                     |
|                                         | Puncture or rupture     | <1 to 55                         | <1 to 55                                |                                                                                                                        |
| <b>Operational Equipment Containers</b> |                         |                                  |                                         |                                                                                                                        |
| Transformer#1                           | Puncture or rupture     | <1 to 523                        | <1 to 523                               | Onto concrete slab<br>and north onto<br>surrounding<br>vegetation; spill kits<br>available                             |
| Transformer#1A                          | Puncture or rupture     | <1 to 202                        | <1 to 202                               |                                                                                                                        |
| Transformer#2                           | Puncture or rupture     | <1 to 523                        | <1 to 523                               |                                                                                                                        |
| Transformer#2A                          | Puncture or rupture     | <1 to 202                        | <1 to 202                               |                                                                                                                        |
| Transformer#3                           | Puncture or rupture     | <1 to 584                        | <1 to 584                               | Into curbed<br>concrete secondary<br>containment and<br>into oil water<br>separator                                    |
| Transformer#4                           | Puncture or rupture     | <1 to 123                        | <1 to 123                               | Onto concrete slab<br>and north onto<br>surrounding<br>vegetation; spill kits<br>available                             |
| Transformer#5                           | Puncture or rupture     | <1 to 123                        | <1 to 123                               |                                                                                                                        |

<sup>a</sup> It is assumed that if tanks are filled/emptied while attended that overfilling of tanks and other spills associated with product transfer would be detected within approximately one minute.  
<sup>b</sup> Spills occurring inside buildings would likely remain on the interior floors and not flow outside of the building.  
<sup>c</sup> AST: aboveground storage tank  
<sup>d</sup> <: less than

|                |                     |           |           |                                                                                            |
|----------------|---------------------|-----------|-----------|--------------------------------------------------------------------------------------------|
| Transformer#1  | Puncture or rupture | <1 to 523 | <1 to 523 | Onto concrete slab<br>and north onto<br>surrounding<br>vegetation; spill kits<br>available |
| Transformer#1A | Puncture or rupture | <1 to 202 | <1 to 202 |                                                                                            |
| Transformer#2  | Puncture or rupture | <1 to 523 | <1 to 523 |                                                                                            |
| Transformer#2A | Puncture or rupture | <1 to 202 | <1 to 202 |                                                                                            |
| Transformer#3  | Puncture or rupture | <1 to 584 | <1 to 584 | Into curbed<br>concrete secondary<br>containment and<br>into oil water<br>separator        |
| Transformer#4  | Puncture or rupture | <1 to 123 | <1 to 123 | Onto concrete slab<br>and north onto<br>surrounding<br>vegetation; spill kits<br>available |
| Transformer#5  | Puncture or rupture | <1 to 123 | <1 to 123 |                                                                                            |

## 9.0 Containment and/or Diversionary Structures or Equipment—40 CFR 112.7(c)

Containment and diversionary structures and equipment have been installed at the facility to prevent oil from reaching navigable waterways, as described in this section. The containment systems at this facility are adequate to contain oil from a typical failure so that any release will not escape before cleanup occurs.

### 9.1 Description of Containment

The facility's containment system includes sized secondary containment with enough capacity to contain 100% of any bulk storage container volume, including ASTs and portable containers.

General containment for non-bulk storage containers, such as transformers, includes the use of concrete containment areas, drip pans, oil water separators, oil handling procedures, and spill response equipment. Spills occurring inside buildings would likely remain on the interior floors and not flow outside of the building.

#### 9.1.1 Aboveground Storage Tanks (AST-1 and AST-2)

The 10,000-gallon AST-1 and the 1,000-gallon AST-2 are constructed of double-walled steel, and failure of the internal tank would be contained within the AST's outer shell. The interstitial space between the tank wall is equipped with a visual leak detection system. AST-1 is listed as a fire-resistant secondary containment tank and a registered fire proofing material has been installed between the shell and liner of AST-2.

#### 9.1.2 2-MW Generator

The 2-MW backup generator is provided with a below the floor, double-walled fuel tank. An alarm system has been installed on the interior floor to detect the presence of liquid (fuel, oil, or coolant) should any of these systems leak or rupture.

#### 9.1.3 Portable Container Storage Areas

A 140-gallon portable backup generator and a 119-gallon portable backup pump are each provided with a double-wall fuel tank. Absorbent booms are available at the facility to contain spills and reduce the potential for offsite migration from this equipment.

Several 55-gallon drums and smaller containers of various oils are stored inside a portable container storage area located inside the Oil and Paint Storage Building. These containers are located inside a covered concrete containment area that provides more than 55 gallons of secondary containment capacity, which is sufficient volume for the largest tank.

#### 9.1.4 Oil-Filled Operational Equipment

Oil-filled equipment, including transformers, are not subject to bulk storage container requirements as described in 40 Code of Federal Regulations (CFR) part 112.2 and do not require sized secondary

containment. However, general secondary containment requirements are intended to address, in accordance with good engineering practice, the most likely oil discharges from this type of oil-filled equipment. The locations of this equipment are illustrated on Figure 2.

Oil-filled electrical equipment with a capacity of 55 gallons or greater in use at the facility includes transformers in various locations across the site. They each have a single-walled steel plate oil tank and are situated on a concrete pad. The transformers are inspected on a regular basis by [REDACTED] personnel to ensure reliability and integrity of the oil container. Sorbent material is located near the transformers to help prevent the discharge of any spilled oil to the surrounding waters.

### 9.2 Spill Response Equipment

The facility's spill response equipment and plan include the following:

- Spill kits are located near the aboveground storage tanks and Maintenance shop. Spill kits include granular sorbent materials, absorbent booms and pads, a shovel, and a broom. Additionally, a loader can be used to create berms and dams for the larger spills.
- The emergency response plan (at the front of this SPCC plan) includes emergency procedures and contact names and cell phone/telephone numbers.

### 9.3 Spill Prevention Best Management Practices

All SPCC-regulated ASTs and bulk storage containers are situated within double-walled secondary containment, on spill containment pallets, and/or off the grade or slab floor, such that the containers, tanks, and equipment are not in direct contact with ponding water and bare soil. Some portable containers (55-gallon drums) are set on concrete or paved areas until being transferred to their storage location. Storing tanks and containers off the ground, and within secondary containment, allows facility personnel to conduct monthly visual inspections to detect problems and/or leakage. Any spill will be identified during routine inspections and cleaned up immediately.

## 10.0 Oil Spill Contingency Plan—40 CFR 112.7(d)

Whenever there is an imminent or actual emergency that could cause a fire and/or release of oil into navigable waters, either the District Superintendent or designee will conduct the following:

- Identify the source and estimate the quantity and the extent of the release.
- Conduct internal notifications of [REDACTED] response personnel, as necessary.
- Stop the release if it is a simple task, such as righting a container or turning a valve.
- Isolate equipment and restrict any source of ignition.
- Call the emergency responders, as described in the "Emergency Response Plan" found in the front of this SPCC plan and perform primary emergency response activities.
- Ensure everyone is accounted for and evacuate all non-essential personnel.

[REDACTED] personnel receive training on how to respond to a spill. A person who discovers a spill is instructed to notify one of the supervisors, who will contact the [REDACTED] Superintendent. An evacuation signal will be given verbally throughout the facility.



In the event of a significant release, the [redacted] Superintendent will direct personnel to contact the emergency responders listed on the call list in the "Emergency Response Plan" found in the front of this SPCC plan. The [redacted] Fire Department and the [redacted] County Environmental Health Division (Regional Hazardous Response Team) are trained emergency responders, and they shall immediately be notified regarding the severity of the situation. The [redacted] Fire Department will assist the [redacted] Superintendent, and the trained responders will conduct all subsequent spill response activities. [redacted] personnel may be part of the response team if they have the proper training and certification.

The [redacted] and [redacted] Fire Department may need to work with other trained responders and agencies such as the Regional Hazardous Response Team (RHRT) to assist with the emergency situation. If a potential crime has been committed, the police department shall be notified immediately. Emergency notification contacts for the regulatory agencies are summarized in the "Emergency Response Plan" at the front of this SPCC plan. During and after the release, [redacted] will:

- gather pertinent information about the spill event and response activities, using the "Spill Report Form" provided in Appendix 2; and
- provide spill notifications to the local and state agencies using the information gathered.

[redacted] will complete a spill incident follow-up report to assess the cause of the spill, document the effectiveness of the response effort, and identify measures that could be taken in the future to prevent a similar spill. If a spill exceeding 1,000 gallons, or two discharges of oil to navigable waters or adjoining shorelines each exceeding 42 gallons occur within any 12-month period, then a follow-up report will be submitted to local, state and federal agencies, as described in in the "Emergency Response Plan" found in the front of this SPCC plan.

### 11.0 Inspections and Records–40 CFR 112.7(e)

Visual observations will be made of the aboveground storage tanks, bulk storage containers, oil-filled equipment, and containment areas by operating personnel daily based on site protocol. In addition to observations during the normal course of operation, ASTs, bulk storage containers, oil-filled equipment and containment areas are subject to periodic inspections at monthly and annual intervals. Appendix 3 presents the inspection checklists based on the standards produced by the Steel Tank Institute (STI, 2018).

The inspector will visually examine various components of the system, including the tanks, piping, valves, vents, supports, and foundations. The tanks and associated features will be closely examined for rust, corrosion, deterioration, and leakage. Inspections will be recorded and signed by the inspector or appropriate supervisor on the Inspection Checklist (Appendix 3). Records of inspections will be kept with the SPCC plan for at least three years. Any deficiencies noted will be promptly investigated and repaired.

### 12.0 Personnel Training and Spill Prevention Procedures–40 CFR 12.7(f)

The [redacted] Superintendent is responsible for operating and maintaining the tanks. The person responsible for overall spill prevention at this facility is:

[redacted] (office) [redacted] (cell)

The following individuals have been designated as the alternate:

[redacted] (office) [redacted] (cell)  
[redacted] (office) [redacted] (cell)

The [redacted] Superintendent is responsible for personnel training and to instruct employees that handle oil in the safe operation of the tank-filling system, spill cleanup, and reporting procedures. Training includes: the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of the SPCC plan (Appendix 4).

Spill prevention training will be given to oil-handling personnel on a yearly basis. The briefings should describe known discharges or failures, any known malfunctioning components, and any recently developed precautionary measures.

Employees are instructed to notify their supervisor when a significant oil release is discovered, and they are trained when, where, and how to evacuate. An evacuation signal will be given verbally throughout the complex. Emergency numbers are posted.

Annual refresher training consists of the above-mentioned programs, including an adequate understanding of this SPCC plan. The employee training record is kept for a period of three years.

### 13.0 Security–40 CFR 112.7(g)

The facility is enclosed with chain-link fencing topped with barbed wire. Gates are closed and locked when not in use. The facility is staffed by trained personnel 24 hours a day. Access to the 2MW generator enclosure is locked. The fuel dispenser pumps can only be activated by approved personnel only. The fill port of the AST-1 is locked when not in service. The facility has sufficient lighting to allow the discovery of spills during the hours of darkness by operating personnel. Lighting is also sufficient to deter spills caused by acts of vandalism.

### 14.0 Facility Loading/Unloading Rack–40 CFR 112.7(h)

This site does not have a loading/unloading rack. Tank trucks are commercial carriers regulated by the U.S. Department of Transportation (DOT). Fuel is delivered by a tank truck and unloaded into the storage tanks. Fuel transfer procedures are listed in Section 18.0.

### 15.0 Brittle Fracture Evaluation–40 CFR 112.7(i)

No tank at the facility has been field-constructed; therefore, there is no requirement for conducting brittle fracture evaluations.

## 16.0 Facility Drainage—40 CFR 112.8(b)

Surface drainage from the wash down area flows to a drainage inlet located in the central portion of the facility and then into an oil/water separator. A portion of the site drains to a small drainage inlet that flows to an open culvert between the Chlorination and Pump Station No. 6 buildings, out-letting in the Pump Station 6 forebay. A portion of the site's surface drainage flows down the southside of the access road, until the flow crosses northerly over the road and continues northwesterly through a vegetated field. Drainage from the vegetated field flows overland or as shallow concentrated flow to the [REDACTED]

There are no diked storage areas at this facility. Flapper type drain valves are not used at this site. Discharge from the site is by gravity through a stormwater drainage system and as overland flow. Drainage from the facility, which could contain significant quantities of oil is routed through the oil/water separator. The impounded stormwater is inspected, and any petroleum product is removed prior to allowing flow to discharge into a vegetated field and continue overland to the [REDACTED]. The surface inlet drains at the facility are located in areas that are not subjected to periodic flooding.

Discharge from the facility flows into a field and continues overland by gravity through vegetation before reaching any water courses. There are no pumps used to transfer drainage at this facility. Drainage from the facility does not empty directly into an open body of water.

Regional topography and drainage patterns are shown on Figure 1, and site drainage patterns are shown on Figure 2.

## 17.0 Bulk Storage Containers—40 CFR 112.8(c)

This section provides details on spill prevention measures for the bulk storage containers in use at the facility.

### 17.1 Tank Configuration

AST records and photographs can be found in Appendix 5.

#### 17.1.1 AST-1

This shop-fabricated 10,000-gallon doubled-walled horizontal cylindrical steel tank is a UL-2085 listed Fireguard AST and was manufactured in 2001 by Modern Welding Company. AST-1 is located adjacent to the 2MW generator in the southwest portion of the facility (Figure 2).

This tank is equipped with a fill port on top of the tank that is piped down the front to a locked overspill secondary containment bucket. Fuel dispensing is piped from the top of the tank, down the side, and through a small section of trench drain before it connects to the 2MW generator bulk storage tank at ground level. Primary and emergency vents, manway, and interstice monitoring port are on top of the tank. This AST is equipped with a direct vision gauge that helps the operator prevent overfilling of the tank beyond 90 percent of its total capacity. The bottom of this AST is on metal supports to allow inspection beneath the tank, and to reduce the likelihood of corrosion of the tank bottom and consequent failure of the tank. The concrete containment wall protects the AST from vehicle impacts.

There are no diked storage areas at this facility. Flapper type drain valves are not used at this site. Discharge from the site is by gravity through a stormwater drainage system and as overland flow. Drainage from the facility, which could contain significant quantities of oil is routed through the oil/water separator. The impounded stormwater is inspected, and any petroleum product is removed prior to allowing flow to discharge into a vegetated field and continue overland to the [REDACTED]. The surface inlet drains at the facility are located in areas that are not subjected to periodic flooding.

Discharge from the facility flows into a field and continues overland by gravity through vegetation before reaching any water courses. There are no pumps used to transfer drainage at this facility. Drainage from the facility does not empty directly into an open body of water.

#### 17.1.1 AST-1

This shop-fabricated 10,000-gallon doubled-walled horizontal cylindrical steel tank is a UL-2085 listed Fireguard AST and was manufactured in 2001 by Modern Welding Company. AST-1 is located adjacent to the 2MW generator in the southwest portion of the facility (Figure 2).

### **17.1.2 AST-2**

This 1,000-gallon, doubled-walled horizontal cylindrical steel tank is a FireSafe split tank system manufactured by Ned Pepper, Inc. The dual-compartment AST holds a maximum of 250 gallons of unleaded gasoline and a maximum of 750 gallons of diesel fuel that provides fuel to district vehicles. AST-2 is situated under cover in the northern portion of the facility (Figure 2).

Fill ports and dispensing ports are located on top of the tank. This AST is equipped with a direct vision gauge that helps the operator prevent overfilling of the tank beyond 90 percent of its total capacity. This tank is elevated above the concrete slab on integral, steel, saddle type supports, and is equipped with primary vents and emergency vents, and interstitial monitoring ports. The bottom of this AST is on metal supports to allow inspection beneath the tank, and to reduce the likelihood of corrosion of the tank bottom.

### **17.1.3 2MW Generator**

The 2-MW backup generator is provided with a below the floor, double-walled fuel tank. An alarm system has been installed on the interior floor to detect the presence of liquid (fuel, oil, or coolant) should any of these systems leak or rupture.

## **17.2 Buried and Partially-Buried Metallic Storage Tanks**

There is no underground storage tank or partially buried metallic tank currently in use at the facility.

## **17.3 Mobile and Portable Bulk Oil Storage Containers**

Mobile or portable oil storage containers (such as, 55-gallon drums), and a portable generator and backup pump are used at this facility. Drum storage occurs inside the Oil and Paint Storage Building, which has a concrete floor slab. The building provides sufficient capacity to contain 100% of a spill from the largest single container.

Both the portable backup generator and portable backup pump are each provided with a double-wall fuel tank. Absorbent booms are available at the facility to contain spills and reduce the potential for offsite migration from this equipment.

## **17.4 Tank Compatibility with Contents**

All SPCC-regulated ASTs are constructed of welded steel. All containers are compatible with the stored products, and all tanks are labeled to indicate their tank contents.

Tank contents are clearly identified and labeled in accordance with the National Fire Protection Association (NFPA) 704 hazard rating system.



### 17.5 Drainage of Accumulated Precipitation

In the event any containment structures need to be manually drained or pumped out, the drainage is subject to the following procedure:

- Inspect collected water for visible sheen or other signs of contamination.
- If sheen is present, use sorbent materials (pads or booms) or other approved method to remove hydrocarbons and investigate the cause.
- Verify no ongoing leakage is occurring.
- Install and activate manual pump if necessary and observe discharge.
- When completely drained of stormwater, close valve or remove pump and hoses.
- Record date of drainage release on the Secondary Containment Drainage Log (Appendix 3). Records shall be kept for at least three years showing each time one of the basins is drained or manually pumped out.

### 17.6 Tank Inspection/Integrity Testing Program

A tank inspection/integrity testing program has been established for the SPCC-regulated ASTs at this facility. The program was established for steel tanks in accordance with the industry standards issued by the STI, "SP001 (Latest Edition) Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids."

#### 17.6.1 Visual Inspections

##### 17.6.1.1 Bulk Storage Containers

Current facility procedures include visual observations of the aboveground storage tanks, bulk storage tanks, and oil-filled equipment during daily operations. The intent of the daily observations is to verify the absence of any critical situations requiring immediate attention.

More rigorous inspection of the aboveground storage tanks and bulk storage containers is required on a monthly and annual basis. The person designated to perform inspections shall document the inspection on the included checklists in Appendix 3. Inspection records must be kept for three years per 40 CFR 112.7 (e). Daily inspections do not need to be documented.

##### 17.6.1.2 Portable Bulk Storage Containers

Portable bulk storage containers at the facility includes a portable pump, a portable generator, and 55-gallon steel drums containing miscellaneous oils. The storage containers shall be inspected monthly, and the inspection shall be recorded on the monthly checklist.

##### 17.6.1.3 Oil/Water Separator

Although not controlled under the SPCC regulation, the two oil/water separators will be monitored to determine whether there is existing oil content or evidence of an oil discharge. Separators are shown on Figure 2.

Maintenance is required when accumulated sediment and sludge at the bottom of the system or floating oil layer has reached the manufacturer's recommended volume to be removed; spills or leaks are noticed in the system, oil or other pollutants are discharging from the system outlet; or obstructions from trash or debris are visible at the inlet or outlet.

In the event any containment structures need to be manually drained or pumped out, the drainage is subject to the following procedure:

- Install and activate manual pump if necessary and observe discharge.

Routine maintenance includes removing captured oils, grease, and sludge from separation chambers and disposing of it properly; removing floating oil layer or emptying oil container; replacing oil absorbing pads before completely saturated; ensuring inlets and outlets are free of sediment, debris and trash; and removing sediment and sludge at bottom of system. Records of maintenance activities are kept with the SPCC.

#### **17.6.2 Non-destructive Certified Testing**

In addition to monthly and annual inspections, AST-1 with capacity 10,000-gallons requires a formal exterior inspection (FEI) to be completed by a certified inspector, at a minimum, every 20 years, unless damage or degradation of the tank identified during visual inspection requires more rigorous testing.

#### **17.7 Internal Heating Coils**

No AST-regulated storage tank at this facility has internal heating coils.

#### **17.8 Overfill Prevention Devices**

Overfill prevention is achieved through the use of the following equipment and procedures to determine liquid levels:

- Spill potential due to overfilling is reduced by confirming the ordered product quantity and verifying the delivery quantity on the tanker truck's delivery order papers.
- All ASTs are equipped with a direct vision gauge that helps the operator prevent overfilling of the tank beyond 90 percent of its total capacity.
- All fuel transfers are overseen by [REDACTED] personnel.
- The delivery trucks are equipped with overfill prevention valves which slow and shut off flow into the tanks when the electronic equipment senses the level of the tank nearing full capacity. The tank truck operators remain with, and monitor, the unloading operation at all times.
- Pumping is commenced at a reduced rate. Upon determination that the transfer system is not leaking, the rate of transfer is slowly increased.
- As transfer operations near completion, the pumping rate is slowed in order to avoid overfilling or the development of spill producing air pockets within the receiving container.
- Absorbent pads, broom and shovel, and cleanup equipment and materials are ready for use on site. Personnel engaged in the transfer have ready access to oil absorbent materials and are familiar with their usage.

#### **17.9 Effluent Treatment Facilities**

This facility does not have an onsite effluent treatment facility.

#### **17.10 Correction of Visible Oil Leaks**

Non-incidentual spills or leaks will be reported to the supervisor in charge, who will contact the District Superintendent. Leaks and spills will be repaired and/or cleaned up immediately. Facility personnel will

◀ [REDACTED] [REDACTED]

take measures to minimize and mitigate the release while awaiting repair. Oil-spill cleanup supplies (spill kits) are located in several areas of the facility. Vendors should carry spill kits when transferring bulk petroleum products.

### 17.11 Piping

The pipes from the 10,000-gallon AST to the 2MW generator are enclosed and are not buried or exposed to soil. Pipes that are not in service for an extended period are capped or blind flanged and marked as to their origin. Pipe supports are properly designed to minimize abrasion and corrosion and are in goodoperating condition.

Personnel regularly inspect aboveground piping and appurtenances and other metal surfaces for evidence of corrosion or leaks. Any needed repairs are made promptly. These visual inspections are documented on the inspection checklist.

## 18.0 Facility Transfer Operations–40 CFR 112.8(d)

Facility transfer operations are associated with the bulk petroleum product containers and ASTs. This section discusses the procedures that shall be used during bulk truck transfers of petroleum from the tank truck to the ASTs.

A spill event could occur during AST filling operations due to operator error or due to faulty hoses or connections. Spill potential due to overfilling is reduced by confirming the ordered product quantity and verifying the delivery quantity on the tanker truck's delivery order papers. The ASTs have gages indicating the amount of product within. The delivery trucks are equipped with overfill prevention valves which slow and shut off flow into the tanks when the electronic equipment senses the level of the tank nearing full capacity.

Tank truck unloading operations are performed under contract to a licensed distributor of petroleum products utilizing unloading procedures and maintaining standards meeting all requirements and regulations of the United States Department of Transportation. The driver is responsible for the inspection of all hoses and connections before filling and prior to departure from the facility and delivery trucks are equipped with a spill kit and with brake interlock hookups that reduce the potential for the truck to move while the delivery hose is connected.

The fill port of the 10,000- gallon AST is fitted with a 10-gallon overfill catchment basin (Baker Box) designed to capture small spills and direct them back into the AST.

In case of emergency, unleaded gasoline or diesel fuel may be dispensed to District vehicles and equipment from the onsite 1,000-gallon dual-compartment AST. Operators stay with the vehicle/equipment and monitor the fuel dispensing operation at all times. Petroleum product spills are cleaned up immediately. The fueling area is inspected daily.

A copy of these fuel transfer guidelines should be used during the training process.

## 19.0 Schedule for Implementation–40 CFR 112.3 and 112.7

The following SPCC recommendations have been completed or are being scheduled for implementation at the facility.

Complete a Formal External Inspection (FEI) on AST-1 in 2022.

## 20.0 References

- Federal Archives. (1973). "Code of Federal Regulations, Title 40, Protection of Environment Chapter I Subchapter D Part 112 Oil Pollution Prevention." Washington, D.C.:National Archives.
- Steel Tank Institute. (2018). "SP001 (Latest Edition) Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids." Lake Zurich, IL:STI.
- U.S. Environmental Protection Agency. (2013). "Spill Prevention, Control, and Countermeasure (SPCC) Guidance for Regional Inspectors." NR:EPA.
- United States Geological Survey. (NR). Burney and Burney Mountain West 7.5 Minute Quadrangle. NR:USGS.



# Certification of the Applicability of the Substantial Harm Criteria

# 1

| Certification of the Applicability of the Substantial Harm Criteria                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| Facility Name:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | [REDACTED] and Control Center |
| Facility Address:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | [REDACTED]                    |
| 1. Does the facility transfer oil over water to or from vessels <b>and</b> does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                               |
| 2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons <b>and</b> does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                                                                                                                                               |                               |
| 3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons <b>and</b> is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to the Department of Commerce/National Oceanic and Atmospheric Administration (DOC/NOAA) "Guidance for Facility and Vessel Response Plans; Fish and Wildlife and Sensitive Environments" (59 Federal Register [FR] 14713, March 29, 1994) and the applicable Area Contingency Plan.<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |                               |
| 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons <b>and</b> is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake? <sup>2</sup><br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                                                                   |                               |
| 5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons <b>and</b> has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?<br><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO                                                                                                                                                                                                                                                                                                                                                                                                            |                               |
| <b>Certification</b><br>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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | [REDACTED] Superintendent     |
| Name (please type or print)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | [REDACTED] Title              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 4-1-22 Date                   |

<sup>2</sup> For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

[REDACTED]

# Spill Report Form **2**

## SPILL REPORT FORM

Complete each section in detail for each agency called. Attach copy of FAX, if used.

1. Number called \_\_\_\_\_, Agency \_\_\_\_\_
2. Person taking report \_\_\_\_\_
3. Time \_\_\_\_\_, Date \_\_\_\_\_
4. Describe spill as given to agency:  
\_\_\_\_\_  
\_\_\_\_\_
5. Source of spill \_\_\_\_\_ Has it been stopped? \_\_\_\_\_
6. Type of product \_\_\_\_\_ Time first observed \_\_\_\_\_
7. Estimated amount of spill \_\_\_\_\_
8. Weather: Dry\_\_\_\_ Rain\_\_\_\_ Temperature\_\_\_\_ Wind\_\_\_\_
9. Describe actions taken to stop spill and cleanup:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
10. Describe effects of spill on soil and water and direction of spill, if known:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
11. Known fire, injuries, health hazards, or damage caused by spill  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
12. Other individuals and organizations contacted thus far:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Reporting Individual \_\_\_\_\_



## STI SP001 Monthly Inspection Checklist

**General Inspection Information:**

|                                                              |                              |                          |
|--------------------------------------------------------------|------------------------------|--------------------------|
| Inspection Date: _____                                       | Prior Inspection Date: _____ | Retain until date: _____ |
| Inspector Name (print): _____                                | Title: _____                 |                          |
| Inspector's Signature _____                                  |                              |                          |
| Tank(s) Inspected ID _____                                   |                              |                          |
| Regulatory facility name and ID number (if applicable) _____ |                              |                          |

**Inspection Guidance:**

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- > For equipment not included in this Standard, follow the manufacturer recommended inspection/leasing schedules and procedures.
- > The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- > Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- > Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.
- > After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

| ITEM                                                                                                                                                                           | STATUS                                                                                | COMMENTS / DATE CORRECTED |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------|
| <b>Tank and Piping</b>                                                                                                                                                         |                                                                                       |                           |
| 1 Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? <i>If "No", identify tank and describe leak and actions taken.</i> | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |                           |
| 2 Is the tank liquid level gauge legible and in good working condition?                                                                                                        | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |                           |
| 3 Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?                                                                 | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |                           |







|                                            |                                                                                                                                                                                                        |                                                                                       |  |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--|
| 3                                          | Tank supports in satisfactory condition?                                                                                                                                                               | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 4                                          | Is water able to drain away from tank if tank is resting on a foundation or on the ground?                                                                                                             | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 5                                          | Is the grounding strap between the tank and foundation supports in good condition?                                                                                                                     | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| <b>Tank Shell, Heads and Roof</b>          |                                                                                                                                                                                                        |                                                                                       |  |
| 6                                          | Free of visible signs of coating failure?                                                                                                                                                              | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |  |
| 7                                          | Free of noticeable distortions, buckling, denting, or bulging?                                                                                                                                         | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |  |
| 8                                          | Free of standing water on roof?                                                                                                                                                                        | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 9                                          | Are all labels and tags intact and legible?                                                                                                                                                            | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |  |
| <b>Tank Manways, Piping, and Equipment</b> |                                                                                                                                                                                                        |                                                                                       |  |
| 10                                         | Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?                                                                                                                    | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| <b>Tank Equipment</b>                      |                                                                                                                                                                                                        |                                                                                       |  |
| 11                                         | Normal and emergency vents free of obstructions?                                                                                                                                                       | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |  |
| 12                                         | Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?                                                                                                                              | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 13                                         | Are flame arrestors free of corrosion and are air passages free of blockage?                                                                                                                           | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 14                                         | Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that manways are moving freely (including long-bolt manways). | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |
| 15                                         | Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connectors intact? If equipment has a test function, does it activate to confirm operation?    | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |  |

### STI SP001 Annual Inspection Checklist

**General Inspection Information:**

Inspection Date: \_\_\_\_\_ Prior Inspection Date: \_\_\_\_\_ Retain until date: \_\_\_\_\_

Inspector Name (print): \_\_\_\_\_ Title: \_\_\_\_\_

Inspector's Signature: \_\_\_\_\_

Tank(s) Inspected ID: \_\_\_\_\_

Regulatory/facility name and ID number (if applicable) \_\_\_\_\_

**Inspection Guidance:**

- > This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- > For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- > The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- > Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- > In order to comply with EPA-SPCC (Spill Prevention, Control and Countermeasures) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- > Non-conforming items **important to tank or containment integrity** require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- > Retain the completed checklists for at least 36 months.
- > Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- > **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

| ITEM                            | STATUS                                                   | COMMENTS/DATE CORRECTED                                                               |
|---------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------|
| <b>Tank Foundation/Supports</b> |                                                          |                                                                                       |
| 1                               | Free of tank settlement or foundation washout?           | <input type="checkbox"/> Yes <input type="checkbox"/> No                              |
| 2                               | Concrete pad or ring wall free of cracking and spalling? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A |





## STI SP001 Monthly Inspection Checklist (6<sup>th</sup> Edition)

### General Inspection Information:

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

Inspector Name (print): \_\_\_\_\_

Inspector's Signature \_\_\_\_\_

Tank(s) inspected or ID #s \_\_\_\_\_

### Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- **After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.**

| ITEM                                                                                                                                                                                                                             | STATUS                                                                               | COMMENTS/DATE CORRECTED |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------------|
| <b>Tank and Piping</b>                                                                                                                                                                                                           |                                                                                      |                         |
| Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks?<br><i>Note: If "No", identify tank and describe leak and actions taken</i>                                             | <input type="checkbox"/> Yes <input type="checkbox"/> No                             |                         |
| Is the tank liquid level gauge legible and in good working condition?                                                                                                                                                            | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?                                                                                                                     | <input type="checkbox"/> Yes <input type="checkbox"/> No                             |                         |
| Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives. | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?                                                                                            | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.                                                    | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| <b>Equipment on Tank</b>                                                                                                                                                                                                         |                                                                                      |                         |
| If overflow equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.                                                                      | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| Is overflow prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.                                                                      | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?                                                                                                                                | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |                         |
| Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? Note: If "No", identify location and describe leak.                                                                                    | <input type="checkbox"/> Yes <input type="checkbox"/> No                             |                         |

|                                                                                                                                                                                                                  |                                                                                      |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--|
| Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?                                                                                                                | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| <b>Containment (Dicking/Impounding)</b>                                                                                                                                                                          |                                                                                      |  |
| Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?                                                                                           | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| Are dike drain valves closed and in good working condition?                                                                                                                                                      | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| Are containment egress pathways clear and any gates/doors operable?                                                                                                                                              | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| <b>Concrete Exterior AST (CE-AST)</b>                                                                                                                                                                            |                                                                                      |  |
| Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?                                                                                                       | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?                                                                 | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| Visual inspect all tank top openings including nipples, manways, tank top overflow containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA |  |
| <b>Other Conditions</b>                                                                                                                                                                                          |                                                                                      |  |
| Is the system free of any other conditions that need to be addressed for continued safe operation?                                                                                                               | <input type="checkbox"/> Yes <input type="checkbox"/> No                             |  |

### Additional Comments:

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**Secondary Containment Drainage Log**

Employee Name: \_\_\_\_\_ Date and Time: \_\_\_\_\_

Location: \_\_\_\_\_

What was the appearance of the water at the time of pumping or discharge? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Was there visible oil sheen on the surface or other noticeable pollution in the water?  Yes  No

Operator Signature: \_\_\_\_\_

Supervisor Signature: \_\_\_\_\_

\*Keep this completed form with SPCC for a minimum of 3 years.



[REDACTED]  
[REDACTED] Operations and Control Center  
[REDACTED] Training Agenda

Date 2-1 2022

Spill Prevention Control and Countermeasure (SPCC) Plan

- Operations and maintenance and inspection of equipment to prevent discharges;
- Discharge procedure protocols;
- Applicable pollution control laws, rules, and regulations; general facility operations; and,
- The contents of the facility SPCC Plan.

| Name (Print) | Name (Signature) | Job Title / Job Description |
|--------------|------------------|-----------------------------|
| [REDACTED]   | [REDACTED]       | Superintendent              |
| [REDACTED]   | [REDACTED]       | MECHANIC                    |
| [REDACTED]   | [REDACTED]       | Supervisor                  |
| [REDACTED]   | [REDACTED]       | Mechanic                    |
| [REDACTED]   | [REDACTED]       | ASST. SUPERVISOR            |
| [REDACTED]   | [REDACTED]       | SHN                         |
| [REDACTED]   | [REDACTED]       | SHN                         |
|              |                  |                             |
|              |                  |                             |
|              |                  |                             |
|              |                  |                             |

|                                                                                                                                                                                                                                       |                                                                                                                                                                                        |                                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| OWNER'S TANK ID <b>AST-32</b>                                                                                                                                                                                                         | OTHER ID                                                                                                                                                                               | INITIAL SERVICE DATE <b>Sept 89</b>     |
| Manufacturer: <b>Ned Pepper Inc</b>                                                                                                                                                                                                   | Contents: <b>750 lbs</b>                                                                                                                                                               | Construction Date                       |
| Dimensions: <b>1000-g</b>                                                                                                                                                                                                             | Capacity: <b>1000-g</b>                                                                                                                                                                | Last Change of Product Date:            |
| Design: <input type="checkbox"/> UL <input type="checkbox"/> SWRI <input type="checkbox"/> API <input checked="" type="checkbox"/> Other <b>Split</b> <input type="checkbox"/> Unknown                                                | <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular                                                                                                                 | <b>Fire safe</b>                        |
| Construction: <input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date installed: _____            | <input type="checkbox"/> Coated Steel <input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other <b>Steel outer shell</b> |                                         |
| <input type="checkbox"/> Double Bottom <input checked="" type="checkbox"/> Double-Wall                                                                                                                                                | <input type="checkbox"/> Drift inside: Date lining installed: <b>the used 104 steel liner tank</b>                                                                                     |                                         |
| Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete                                                                                                            | CRDM: <input checked="" type="checkbox"/> yes <input type="checkbox"/> no                                                                                                              |                                         |
| Tank elevated on supports: <input checked="" type="checkbox"/> yes <input type="checkbox"/> no                                                                                                                                        | If yes, type: <input type="checkbox"/> Release Prevention Barrier <input checked="" type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank                        |                                         |
| Support material: <input checked="" type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other                                                                                                          | <input checked="" type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input type="checkbox"/> other _____                                                              |                                         |
| Release Prevention Barrier: <input type="checkbox"/> yes <input checked="" type="checkbox"/> no If yes, Date installed: _____                                                                                                         | AST Category: <input checked="" type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3                                                   |                                         |
| If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____                                      |                                                                                                                                                                                        |                                         |
| <b>OWNER'S TANK ID</b>                                                                                                                                                                                                                | <b>OTHER ID</b>                                                                                                                                                                        | <b>INITIAL SERVICE DATE</b>             |
| <del>Manufacturer:</del>                                                                                                                                                                                                              | <del>Contents:</del>                                                                                                                                                                   | <del>Construction Date</del>            |
| <del>Dimensions:</del>                                                                                                                                                                                                                | <del>Capacity:</del>                                                                                                                                                                   | <del>Last Change of Product Date:</del> |
| <del>Design: <input type="checkbox"/> UL <input type="checkbox"/> SWRI <input type="checkbox"/> API <input type="checkbox"/> Other _____ <input type="checkbox"/> Unknown</del>                                                       | <del><input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular</del>                                                                                                      |                                         |
| <del>Construction: <input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date installed: _____</del> | <del><input type="checkbox"/> Coated Steel <input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other _____</del>         |                                         |
| <del><input type="checkbox"/> Double Bottom <input type="checkbox"/> Double-Wall</del>                                                                                                                                                | <del><input type="checkbox"/> Lined inside: Date lining installed: _____</del>                                                                                                         |                                         |
| <del>Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete</del>                                                                                                 | <del>CRDM: <input type="checkbox"/> yes <input type="checkbox"/> no</del>                                                                                                              |                                         |
| <del>Tank elevated on supports: <input type="checkbox"/> yes <input type="checkbox"/> no</del>                                                                                                                                        | <del>If yes, type: <input type="checkbox"/> Release Prevention Barrier <input type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank</del>                        |                                         |
| <del>Support material: <input type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other _____</del>                                                                                                    | <del><input type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input checked="" type="checkbox"/> other _____</del>                                                   |                                         |
| <del>Release Prevention Barrier: <input type="checkbox"/> yes <input type="checkbox"/> no If yes, Date installed: _____</del>                                                                                                         | <del>AST Category: <input type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3</del>                                                   |                                         |
| <del>If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____</del>                           |                                                                                                                                                                                        |                                         |

AST Record

Page 2 of 2

| OWNER INFORMATION     |            | FACILITY INFORMATION                          |            | INSTALLER INFORMATION |            |
|-----------------------|------------|-----------------------------------------------|------------|-----------------------|------------|
| Name                  | [REDACTED] | Name                                          | [REDACTED] | Name                  | [REDACTED] |
| Number and Street     | [REDACTED] | Number and Street                             | [REDACTED] | Number and Street     | [REDACTED] |
| City, State, Zip Code | [REDACTED] | City, State, Zip Code                         | [REDACTED] | City, State, Zip Code | [REDACTED] |
|                       |            | Regulatory facility ID number (if applicable) |            |                       |            |

**STI SP001 AST Record**

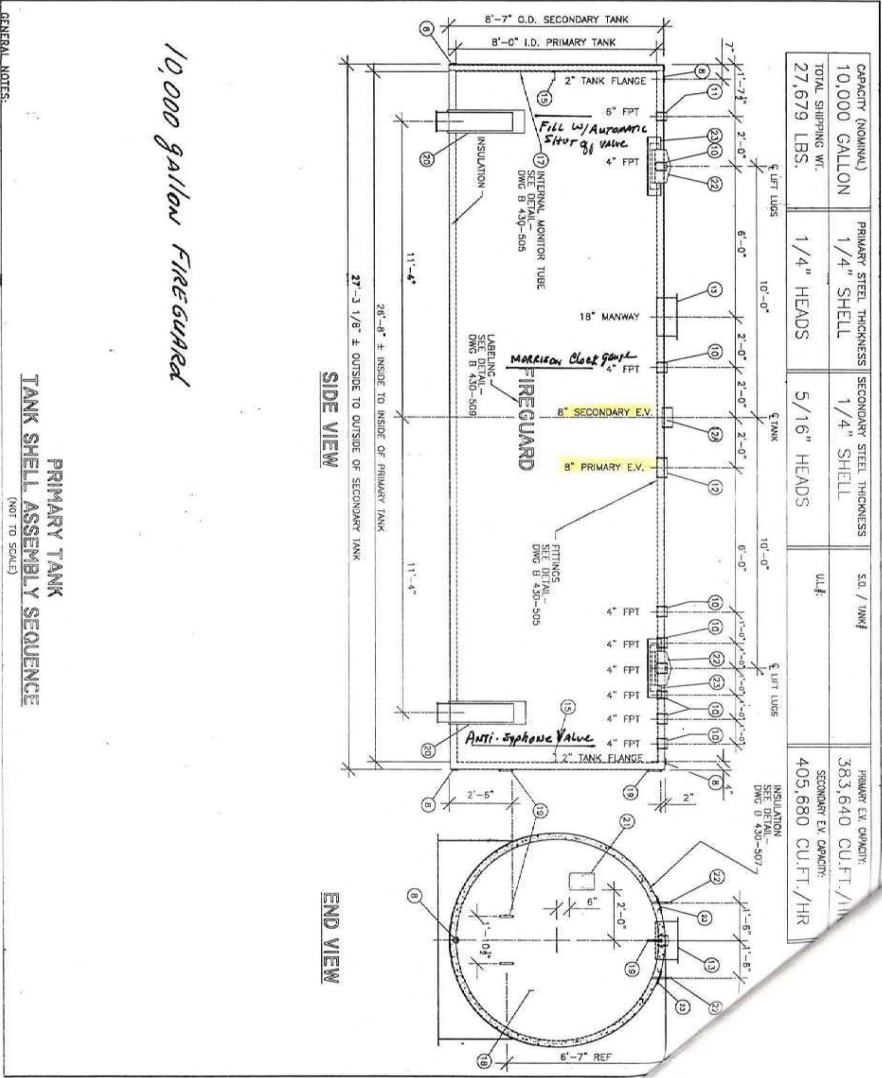
Form completed by (Name) [REDACTED]  
(Title) **AST-1835 Coated Tank Inspector**

Date **2/1/22**

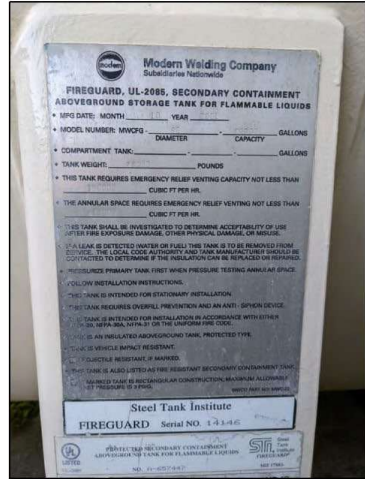
|                                                                                                                                                                                                                            |                                                                                                                                                                                |                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| OWNER'S TANK ID <b>AST-1</b>                                                                                                                                                                                               | OTHER ID                                                                                                                                                                       | INITIAL SERVICE DATE                            |
| Manufacturer: <b>Modern Welding Co</b>                                                                                                                                                                                     | Contents: <b>disc</b>                                                                                                                                                          | Construction Date: <b>10/2001</b>               |
| Dimensions: <b>3/4" diameter</b>                                                                                                                                                                                           | Capacity: <b>10,000-g</b>                                                                                                                                                      | Last Change of Product Date: <b>28,000 lbs.</b> |
| Design: <input checked="" type="checkbox"/> UL <b>2085</b> <input type="checkbox"/> SWRI <input type="checkbox"/> API <input type="checkbox"/> Other _____ <input type="checkbox"/> Unknown                                | <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical <input type="checkbox"/> Rectangular                                                          |                                                 |
| Construction: <input type="checkbox"/> Bare Steel <input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date installed: _____ | <input type="checkbox"/> Coated Steel <input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other <b>Fireguard</b> |                                                 |
| <input type="checkbox"/> Double Bottom <input checked="" type="checkbox"/> Double-Wall                                                                                                                                     | <input type="checkbox"/> Lined inside: Date lining installed: _____                                                                                                            |                                                 |
| Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete                                                                                                 | CRDM: <input checked="" type="checkbox"/> yes <input type="checkbox"/> no                                                                                                      |                                                 |
| Tank elevated on supports: <input checked="" type="checkbox"/> yes <input type="checkbox"/> no                                                                                                                             | If yes, type: <input type="checkbox"/> Release Prevention Barrier <input checked="" type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank                |                                                 |
| Support material: <input checked="" type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other _____                                                                                         | <input checked="" type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input type="checkbox"/> other _____                                                      |                                                 |
| Release Prevention Barrier: <input type="checkbox"/> yes <input checked="" type="checkbox"/> no If yes, Date installed: _____                                                                                              | AST Category: <input checked="" type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3                                           |                                                 |
| If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____                           |                                                                                                                                                                                |                                                 |

AST Record

Page 1 of 2



AST-1





AST-1



2

AST-1



3

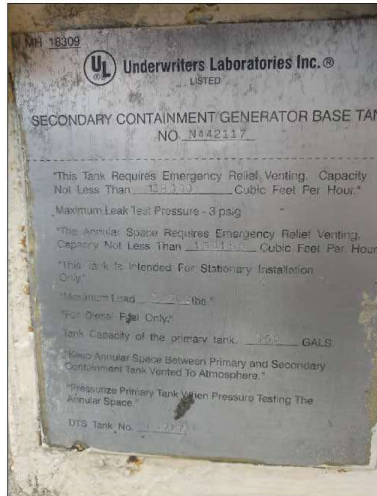
AST-1



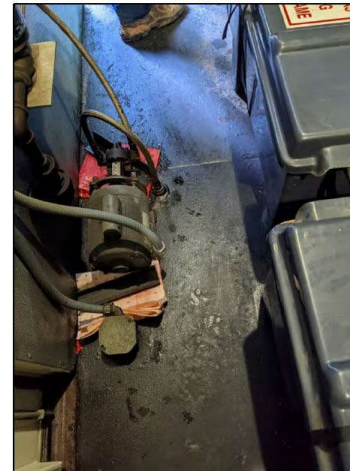
AST-1



2 MW Generator

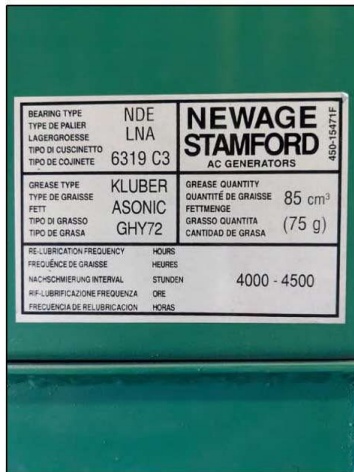
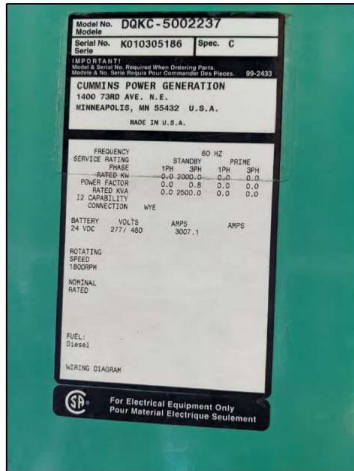


2 MW Generator





2 MW Generator



2 MW Generator





BOARD OF DIRECTORS

August 25, 1992

GENERAL MANAGER

State Water Resources Control Board  
Division of Clean Water Programs  
2014 T Street, Suite 130  
P.O. Box 944212  
Sacramento, Ca 94244-2120

Attention: [REDACTED]

Re: Above Ground Storage Tank Storage Statement

Dear Ms. [REDACTED]

The [REDACTED] District installed a one thousand gallon above ground storage tank in September 1991. The tank has two compartments, one of which holds 250 gallons of unleaded gasoline, the other holds 750 gallons of diesel fuel.

The tank is located at [REDACTED] California and the contact person for the tank facility is [REDACTED] who can be reached at [REDACTED]. The alternate contact person is [REDACTED].

I have enclosed a check for \$100 for the Storage Statement fee.

Sincerely,

[REDACTED]  
General Manager

AB/faa

copy: [REDACTED] RWQCB Santa Rosa

State of California  
AIR RESOURCES BOARD

Executive Order 6-70-136

Certification of Ned Pepper, Incorporated  
FireSafe Aboveground Tank  
Filling/Dispensing Vapor Recovery System

WHEREAS, the Air Resources Board (the "Board") has established, pursuant to Sections 39600, 39601, and 41954 of the Health and Safety Code, certification procedures for systems designed for the control of gasoline vapor emissions displaced during the filling of storage tanks at service stations ("Stage I vapor recovery systems") and for the control of gasoline vapor emissions from motor vehicle fueling operations ("Phase II vapor recovery systems") in its "Certification Procedures for Gasoline Vapor Recovery Systems at Service Stations" as last amended December 4, 1981 (the "Certification Procedures"), incorporated by reference in Section 94001 of Title 17, California Administrative Code;

WHEREAS, the Board has established, pursuant to Sections 39600, 39601, and 41954 of the Health and Safety Code, test procedures for determining compliance of Phase I and Phase II vapor recovery systems with emission standards in its "Test Procedures for Determining the Efficiency of Gasoline Vapor Recovery Systems at Service Stations" as last amended September 1, 1982 (the "Test Procedures"), incorporated by reference in Section 94000 of Title 17, California Administrative Code;

WHEREAS, Ned Pepper, Incorporated has applied for certification of the FireSafe aboveground gasoline tank for balance Phase I and Phase II operation;

WHEREAS, Section VIII-A of the Certification Procedures provides that the Executive Officer shall issue an order of certification if he or she determines that a vapor recovery system conforms to all of the requirements set forth in Sections I through VII; and

WHEREAS, I find that the Ned Pepper, Incorporated FireSafe aboveground gasoline tank system, when used with ARB Certified Phase I and Phase II vapor recovery components, conforms with all the requirements set forth in Sections I through VII of the Certification Procedures;

NOW, THEREFORE, IT IS HEREBY ORDERED that this certification applies to the Ned Pepper, Incorporated FireSafe aboveground gasoline tanks of 2,000 gallons or less capacity, including split tank systems. The system certified hereby is shown in Exhibit 1 attached. Air Resources Board

certified Phase I components from Exhibits 1 thru 3 of Executive Order G-70-97-A and certified Phase II components from Executive Order G-70 series are to be used.

IT IS FURTHER ORDERED that any emergency vent installed on the tanks be leak free at the operating pressure of the tank when tested in accordance with ARB Method 2-6, "Test Procedures for Gasoline Vapor Leak Detection Using Combustible Gas Detector" as last amended September 1, 1982 (the "Test Procedures"), incorporated by reference in Section 94000 of Title 17, California Administrative Code.

IT IS FURTHER ORDERED that the threaded stem normally used with the Bobtail truck bulk delivery nozzle be replaced with an OPW 633 BA coupling/adaptor along with an OPW 633 BD reducing coupler (or an equivalent arrangement that allows for no leakage of gasoline) to connect the Bobtail truck bulk delivery nozzle with the storage tank fill adaptor during transfer of gasoline from the delivery truck to the storage tank. An OPW 633 A or 633 F adaptor coupled with 633 B or 633 D adaptors or equivalent may be used for interchangeability of the nozzle stem and 633 BD reducing coupler.

IT IS FURTHER ORDERED that the general exterior of the storage tanks be painted white.

IT IS FURTHER ORDERED that compliance with the rules and regulations of the local air pollution control district and local fire officials with jurisdiction where the installed system is located, shall be made a condition of this certification.

IT IS FURTHER ORDERED that the use of a PV valve shall require the prior approval of the local fire chief, and that the tanks and piping shall comply with the appropriate General Industry Safety Orders and in particular the provisions of articles 144, 145, and 146 thereof.

IT IS FURTHER ORDERED that compliance with all applicable certification requirements and rules and regulations of the Division of Measurement Standards, the Office of the State Fire Marshal, and the Division of Occupational Safety and Health of the Department of Industrial Relations shall be made a condition of this certification.

IT IS FURTHER ORDERED that any alteration of the equipment, parts, design, or operation of the configurations certified hereby, is prohibited, and deemed inconsistent with this certification, unless such alteration has been approved by the undersigned or the Executive Officer's designee.

Executed this 15th day of April 1991, at Sacramento, California.

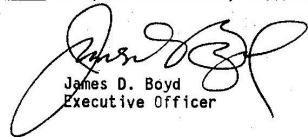
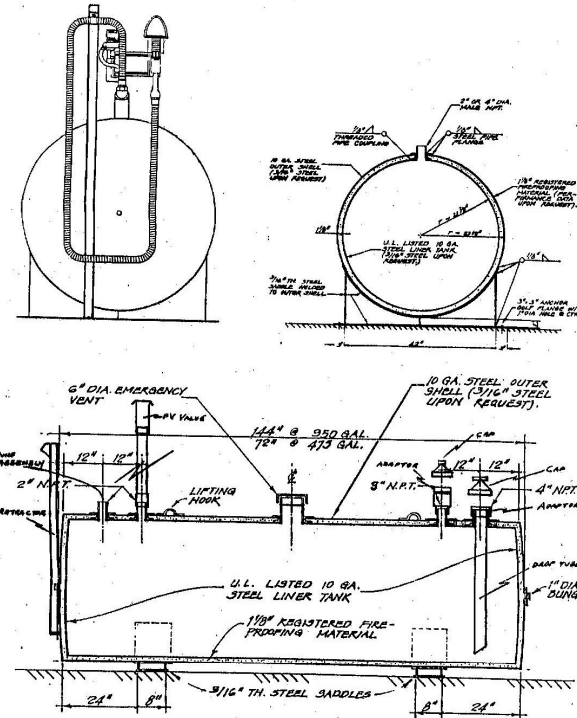
  
James D. Boyd  
Executive Officer

Exhibit 1  
Executive Order G-70-136

**FireSafe**  
BY NED PEPPER, INC.



Notes:

See Executive Order G-70-97-A (Exhibits 1, 2 & 3) for listing of ARB certified Phase I two-point and coaxial vapor recovery equipment and pressure/vacuum valves for storage tanks.

See Executive Order G-70 series for ARB certified Phase II vapor recovery equipment.

AST-2



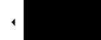
AST-2



AST-2



AST-2





AST-2



AST-2



Portable Pump



Portable Generator



Portable Container Storage Area



Transformers 1 and 1a





Transformers 2 and 2a

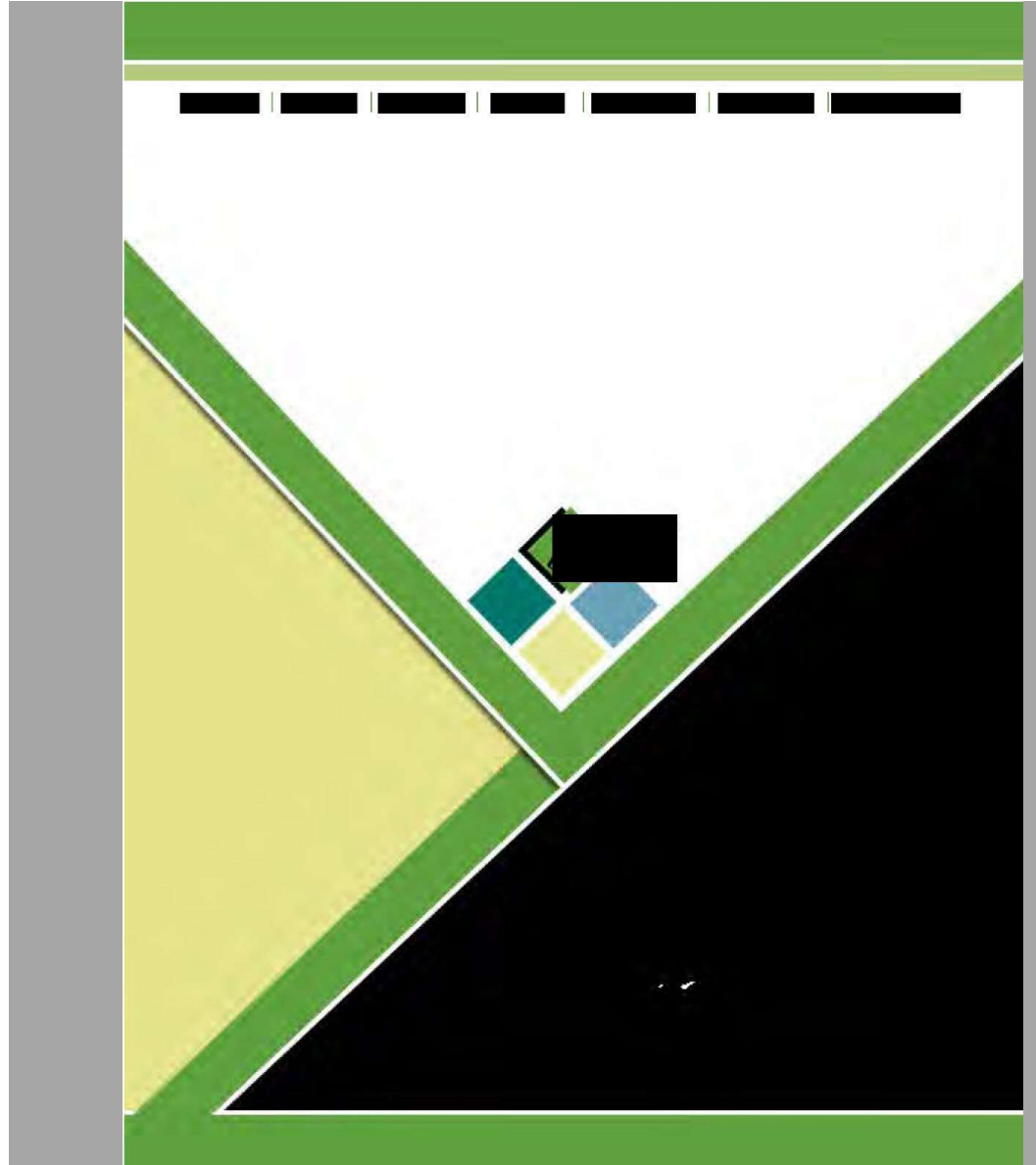


Transformer 3





Transformers 4 and 5



# BREAK TIME!



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

# Environmental Equivalence 40 CFR §112.7(a)(2)

## SPCC Guidance for Regional Inspectors

The environmental equivalence provision allows for deviations from specific requirements of the SPCC rule, as long as the alternative measures provide equivalent environmental protection. A PE must review the selection of environmentally equivalent measures and certify them as being consistent with good engineering practice.

EPA's 2004 letter to the Petroleum Marketers Association of America

[https://www.epa.gov/sites/production/files/2014-04/documents/h\\_danielgilligan\\_pmaa.pdf](https://www.epa.gov/sites/production/files/2014-04/documents/h_danielgilligan_pmaa.pdf)



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

# Impracticability Statement

If you determine that the installation of any of the structures or pieces of equipment to prevent a discharge is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under § 112.20, provide in your Plan the following:

- (1) An oil spill contingency plan following the provisions of part 109 of this chapter.
- (2) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.





# Determining Tank Category

AST categories used in Table 5.5 (Appendix A includes further explanation of some typical tank types and their corresponding AST category.):

- Category 1 - ASTs with spill control and CRDM
- Category 2 - ASTs with spill control, and without CRDM
- Category 3 - ASTs without spill control (note Category 3 ASTs may not meet regulatory requirements)



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

# Determining Tank Category

SPILL CONTROL - A means of preventing a release of liquid to the environment, including adjoining property and waterways. Spill control methods include:

- Remote impounding
- Secondary containment system
- Secondary containment dike/berm
- Open top steel diked AST
- Closed top steel diked AST with overfill prevention
- Double-wall AST with overfill prevention
- CE-AST with overfill prevention



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February 26-29, 2024

# Determining Tank Category

CONTINUOUS RELEASE DETECTION METHOD (CRDM) A means of detecting a release of liquid through inherent design. CRDM is passive because it does not require sensors or power to operate. Liquid releases are visually detected by facility operators (See Appendix A for additional information). The system shall be designed in accordance with good engineering practice. Several acceptable and commonly used CRDM systems are:

- Release prevention barrier (RPB) (described in definition of Release Prevention Barrier)
- Double-wall AST or double-bottom AST
- Elevated AST, with or without release prevention barrier
- Steel diked AST, open or closed top
- Concrete exterior AST (CE-AST) with an integral secondary containment and interstitial monitoring opening



# Determining Tank Category

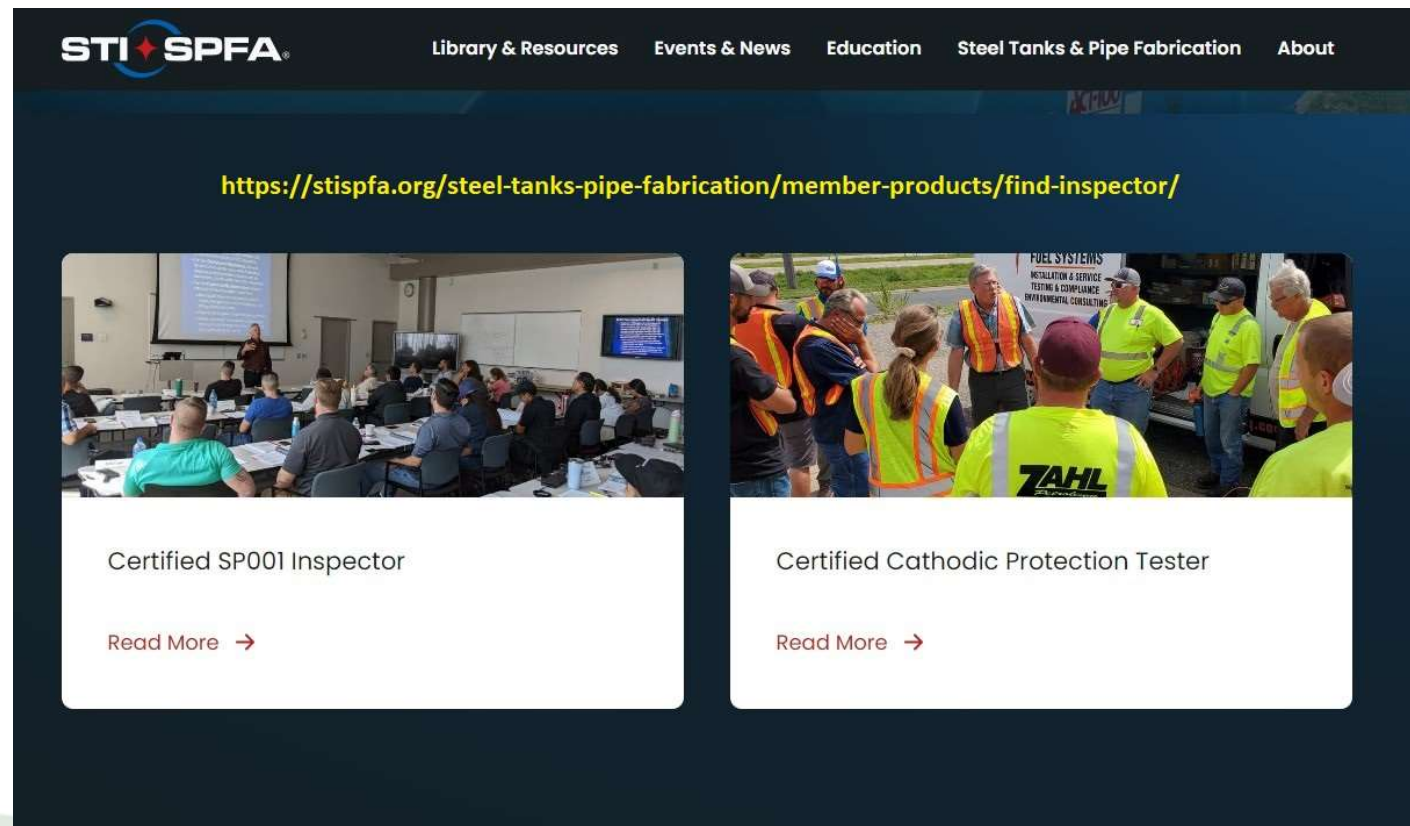
**RELEASE PREVENTION BARRIER (RPB)** A liquid containment barrier that is installed under the AST. Its purpose is to divert leaks toward the perimeter of the AST where they can be easily detected, as well as to prevent liquid from contaminating the environment. RPBs are composed of materials compatible with the liquid stored in the AST and meet appropriate engineering standards. Examples are steel (as in steel double-bottom tanks), concrete, elastomeric liners, or other suitable materials, provided the above criteria are met.



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024



# STI Inspector Search



The screenshot shows the STI SPFA website with a navigation bar containing: Library & Resources, Events & News, Education, Steel Tanks & Pipe Fabrication, and About. The main content area features a URL: <https://stispfa.org/steel-tanks-pipe-fabrication/member-products/find-inspector/>. Below the URL are two featured articles:

- Certified SP001 Inspector**  
Read More →
- Certified Cathodic Protection Tester**  
Read More →



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024

[REDACTED]

Reference: 022006

July 14, 2023

[REDACTED]

**Subject: Formal External Inspection Summary Report, [REDACTED]**

Dear [REDACTED]:

## 1.0 Introduction

As requested by [REDACTED] completed a formal external inspection (FEI) on one cylindrical, horizontal, shop-fabricated, aboveground fuel storage tank at [REDACTED]. [REDACTED] has prepared this FEI summary report in accordance with California Health and Safety Code Chapter 6.67 25270.4.5(a) and Code of Federal Regulations 40 CFR 112.8(c)(6).

The [REDACTED] facility is required to prepare a spill prevention, control, and countermeasures (SPCC) plan applying good engineering practices to prevent petroleum releases. The facility is required to conduct periodic inspections, annual inspections, and integrity testing/formal inspections on aboveground storage tanks (ASTs). The frequency of tank inspections is based on implementation of a scheduled inspection-testing program described in the SPCC plan.

On June 21, 2023, [REDACTED] conducted an FEI and integrity test on a Category 1, 10,000-gallon, double-walled steel diesel fuel tank (AST-1). The FEI was performed in accordance with the Steel Tank Institute's (STI) "Standard for the Inspection of Aboveground Storage Tanks, SP001, 6<sup>th</sup> Edition" (STI, 2018).

The purpose of conducting inspections is to identify the condition of, and changes to, the AST. Tank inspections and evaluation criteria are required to determine the suitability for continued service of the AST until the next scheduled inspection.

The following sections conform to guidelines found in the STI standard inspection procedure (SP001). A site map, inspection checklist, tank sketch and photographs, and STI SP001 periodic and annual inspection blank forms are included in the appendices.

[REDACTED]

[REDACTED]  
**Formal External Inspection Summary Report, [REDACTED]**

July 14, 2023

Page 2

Results of this inspection indicate AST-1 is suitable for continued service.

## 2.0 General Project Description

The [REDACTED] facility is located in [REDACTED]. The site is situated south of and adjacent to the [REDACTED] (Appendix 1).

An FEI was performed on a 10,000-gallon, cylindrical, horizontal, double-walled, steel AST (AST-1) by [REDACTED] Certified STI Inspector (No. AST-[REDACTED]). The facility SPCC Plan indicates a certified inspection will be performed in accordance with industry standards, at least every 20 years ([REDACTED] 2022).

A detailed checklist was developed and used to identify, record, and document all aspects of the inspection (Appendix 2). The facility SPCC plan was also evaluated.

A nameplate affixed to the shell of the diesel fuel tank (AST-1) to verify the standard of fabrication to which the tank was manufactured indicates that the tank was manufactured in 2001 by Modern Welding Company. The tank is labeled as a Fireguard, UL-2085, Secondary Containment Aboveground Storage Tank for Flammable Liquids, with capacity of 10,000 gallons. The AST measures 96 inches in diameter.

The inspection consisted of, at a minimum, evaluation of the primary tank, supports, and anchors; tank foundation and external supports; tank gauges and alarms; overfill valves and alarms; appurtenances; normal and emergency vents; release prevention barriers; and spill-control systems. Ultrasonic thickness testing (UTT) to measure shell thickness was not required.

A tank sketch from the manufacturer and photographs are provided in Appendix 3.

## 3.0 Foundation and Supports

Foundation and supports were inspected for indications of settlement, cracking, exposed rebar, or general disrepair, including wash-out and voids. There was no indication of settlement, exposed rebar, or wash-out. The ground is sloped away from the AST, and water does not accumulate. There is no soil resting against the AST, and there is no indication of drainage problems.

AST-1 is elevated and situated on steel supports, to allow inspection beneath the tank and to reduce the likelihood of corrosion on the tank bottom. The supports are welded to the shell and anchored securely onto the concrete foundation. No visible signs of stress, deterioration, or cracking was observed.

## 4.0 Secondary Containment and Continuous Release Detection Method

The horizontal AST is a double-walled steel tank with overfill protection. The outer tank provides integral secondary containment with capacity to hold the entire contents of the tank. The tank is

situated on a concrete pad and is elevated off the ground, providing a continuous-release detection method (CRDM) to identify spills or leaks on the containment area and pad foundation.

The containment area is in good condition, and no breach was observed in the secondary containment. The area is free of foreign materials, and egress pathways are clear.

## 5.0 Equipment

### 5.1 Piping

Piping, piping supports, and piping connections were inspected for signs of stress or leakage caused by severe corrosion, rusted connections, or other degradation. This tank is equipped with a fill port on top of the tank that is piped down the front to a locked overspill secondary containment bucket. Fuel dispensing is piped from the top of the tank, down the side, and through a small section of trench drain before it connects to the 2-megawatt (MW) generator bulk storage tank at ground level.

The fill piping connections on top of the tank and the dispensing piping on top of the tank (valves, fittings, pumps) are free of leaks. Piping is supported and is secure. No stress was observed.

A secondary tank drain plug is located underneath of AST-1, and no corrosion or leaking was detected at this location. A fire or shear valve was not observed on the tank. No corrosion was observed on piping.

### 5.2 Normal and Emergency Vents

Normal venting is achieved through an opening or device that allows free movement of air in and out of the tank. It also allows the relief of excessive internal pressure or vacuum during normal storage and operations, which include filling and emptying the tank. Emergency venting relieves excessive internal pressure due to fire exposure.

AST-1 has a normal vent that extends 12 feet above the ground. AST-1 is equipped with a primary emergency vent with 390,000 standard cubic feet per hour (SCFH) capacity and a secondary emergency vent with 412,000 SCFH capacity, which provide sufficient emergency relief venting and are located on top of the tank atop. The normal vent was observed to be operable and in good condition. Emergency vents were tested and observed to be operable and in good condition.

### 5.3 Liquid Level Gauge

AST-1 is equipped with a direct vision gauge. The level gauge was inspected, is legible, and appears to be in working order. Fuel levels and inventory are manually determined by inserting a measurement stick and gauging the tank at frequent intervals.

### 5.4 Interstitial Monitoring

The space between the primary tank and secondary tank is the interstice space, which is monitored by visual inspection. No liquid was present in the interstice space during testing.

### 5.5 Overfill Protection

An automatic shutoff valve has been installed to stop delivery of fuel at 90% capacity. Additionally, an operator is physically present and in control of a shutoff device during tank filling and bulk fuel transfers. The fill port is fitted with a 10-gallon overfill catchment box designed to capture small spills and direct them back into the AST.

Associated spill prevention measures are included in the facility's SPCC plan.

### 5.6 Grounding

A grounding system and connection installed directly to the tank was observed.

### 5.7 Stairways, Handrails, and Platforms

Handrails, stairways, and platforms attached to AST-1 were inspected and appear to be secure. No broken welds, bent members, or corrosion was observed.

### 5.8 Shell, Heads, and Roof

Coating on the tank shell and supports was inspected. The coating on the AST shell appeared to be in good condition and free of visible leaks.

Shell plates and welds, and ancillary equipment were inspected for indications of exterior corrosion, buckling, or distortion or stress, as well as for cracking, pinholes, or mechanical damage. No buckling, distortion, stress, cracking, pinholes, or mechanical damage was observed. No stress or corrosion was observed on shell attachments or welds. No observable change has been made to the AST after fabrication.

## 6.0 Shell Thickness Evaluation

Shell thickness is  $\frac{1}{4}$  inch as identified on the manufacturer's primary tank shell assembly sequence (Appendix 3). A placard was affixed to AST-1, but the original metal gauge thickness was illegible.

No liquid was present in the interstitial space, and no visible corrosion or pitting was observed during the FEI. Therefore, metal thickness measurements are not required and were not taken on the secondary tank.

Original shell thickness measurements for AST-1 meet UL 2085 standards for original minimum steel thickness.

## 7.0 Summary and Recommendations

This final FEI report includes a site map, inspection checklist, a tank sketch provided by the manufacturer, inspection summary and recommendations, and a determination of tank suitability for continued service.





Site Map

**1**

Formal External  
Inspection Checklist

**2**

SP1 SP001 FORMAL EXTERIOR TANK INSPECTION CHECKLIST

| 21 June 23 | Reference | Item                        | Guideline                                                                                                                                                                                                                                                              | Yes | No | N/A | Comments                                       |
|------------|-----------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|------------------------------------------------|
|            | SP1 SP001 | EQUIPMENT and PIPING        | If overall equipment has a test button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.                                                                                                               |     |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Is overall protection equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.                                                                                                             | X   |    |     | ultrasonic level indicator reported functional |
|            | 7/13.2    | EQUIPMENT and PIPING        | Is the spill containment (guy bucket) empty, free of visible leaks, and in good working condition?                                                                                                                                                                     | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Inspect normal and emergency vents and pressure/vacuum devices. Verify that the devices are of adequate size and capacity, operable, and in good condition. Refer to the manufacturer's literature, typical industry venting requirements, and other applicable codes. | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Are normal and emergency vents free of obstructions and free of dislodged materials.                                                                                                                                                                                   | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Are normal vent and tanks storing gas/air equipped with pressure/vacuum vents?                                                                                                                                                                                         | X   |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Are flame arrestors free of corrosion and are air passages free of blockage?                                                                                                                                                                                           | X   |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Is the emergency vent in good working order condition and functional, as required by manufacturer? Verify that components are moving freely (including both hot and handways).                                                                                         |     |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Is the mechanical leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If present, does the test button, detect and alarm on detection.                                                                         |     |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Are all valves of gas, oxygen, and other damage (hot splash), check, gate, pressure regulator, expansion relief, vented fire, and/or other valves?                                                                                                                     | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Are strikers and filters clean and in good condition?                                                                                                                                                                                                                  | X   |    | X   |                                                |
|            | 7/13.3    | EQUIPMENT and PIPING        | Are piping connections to the tank (valves, flanges, joints, etc.) free of visible leaks?                                                                                                                                                                              | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Inspect primary tank level gauge and secondary tank interstitial gauge for free movement and determine if the floats, guides, and attachments are in working order and legible. Verify the liquid level gauge height is sized correctly for the tank diameter.         | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Is the tank liquid level gauge legible and in good working condition?                                                                                                                                                                                                  | X   |    |     |                                                |
|            | 7/13.4    | EQUIPMENT and PIPING        | Inspect the secondary tank level gauge for proper operation. Where possible, verify free movement of float and attachments to the tank wall. Verify that float is properly secured to the tank wall.                                                                   | X   |    |     | interstitial drain plug verified empty         |
|            | 7/13.5    | EQUIPMENT and PIPING        | Inspect the secondary tank level gauge for proper operation. Where possible, verify free movement of float and attachments to the tank wall. Verify that float is properly secured to the tank wall.                                                                   | X   |    |     | reported functional                            |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Verify and inspect tank overfill prevention devices including high level alarms and high level shut off valves. If any not be possible to verify operation, note where possible. Verify equipment is functional and calibrated to the appropriate liquid levels.       | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Is inventory control being performed and documented if required?                                                                                                                                                                                                       | X   |    |     |                                                |
|            | 7/14      | EQUIPMENT and PIPING        | Is release detection being performed and documented if required?                                                                                                                                                                                                       | X   |    |     |                                                |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Are electrical wiring and boxes in good condition?                                                                                                                                                                                                                     | X   |    | X   |                                                |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Is the cathodic protection system on the tank been tested as required by the designing engineer?                                                                                                                                                                       | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Inspect the handling and grounding system of the AST. If present, refer to NFPA 780 Standard, NFPA 77 Standard.                                                                                                                                                        | X   |    |     |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Inspect the lightning protection system to be secure with no sign of corrosion or damage?                                                                                                                                                                              | X   |    | X   |                                                |
|            | SP1 SP001 | EQUIPMENT and PIPING        | Do the lightning protection system components to be secure with no sign of corrosion or damage?                                                                                                                                                                        | X   |    |     |                                                |
|            | 7/12      | TANK SHELL, HEADS, and ROOF | Inspect the coating on the AST shell and supports for coating failure.                                                                                                                                                                                                 | X   |    |     |                                                |
|            | SP1 SP001 | TANK SHELL, HEADS, and ROOF | Are the tank shell, heads, and roof free of visible signs of coating failure?                                                                                                                                                                                          | X   |    |     |                                                |
|            | SP1 SP001 | TANK SHELL, HEADS, and ROOF | Inspect the standing water on the roof.                                                                                                                                                                                                                                | X   |    |     |                                                |
|            | SP1 SP001 | TANK SHELL, HEADS, and ROOF | Pre all ladders and lugs that are legible on the tank shell, heads, and roof?                                                                                                                                                                                          | X   |    | X   |                                                |

SP1 SP001 FORMAL EXTERIOR TANK INSPECTION CHECKLIST

| 21 June 23 | Reference | Item                        | Guideline                                                                                                                                                                                                                                                                                                                                                                                                             | Yes | No | N/A | Comments                                                                                                                                     |
|------------|-----------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----|-----|----------------------------------------------------------------------------------------------------------------------------------------------|
|            | 7/11      | RECORDS                     | EH performed by certified inspector                                                                                                                                                                                                                                                                                                                                                                                   | X   |    |     |                                                                                                                                              |
|            | 7/12      | RECORDS                     | Inspection company developed detailed checklists                                                                                                                                                                                                                                                                                                                                                                      | X   |    |     |                                                                                                                                              |
|            | 7/13      | RECORDS                     | Review prior formal and periodic inspections                                                                                                                                                                                                                                                                                                                                                                          | X   |    |     | send SP1 SP001 tank inspections to Dale D. Mottram/ Writing Company, Subsidiaries                                                            |
|            | 7/14      | RECORDS                     | Record AST name plate data. Record AST data, inspection findings, and problems identified. AST-1: No. A657447 MH 17883                                                                                                                                                                                                                                                                                                | X   |    |     | Nationwide, Steel Tank Institute, Frigard, Serial No. 14740 U, 2085, Secondary Containment Aboveground Storage tank for Sustainable Indulis. |
|            | 7/15      | RECORDS                     | Inspect the fabrication of the AST against applicable industry standard                                                                                                                                                                                                                                                                                                                                               | X   |    |     |                                                                                                                                              |
|            | 7/16      | FOUNDATION and SUPPORTS     | Inspect the AST foundation for indications of settlement, cracking, exposed rebar, or general distress. Inspect for areas of wash-out and voids under the AST. Confirm that the ground is sloped away from the AST and that there is no soil resting against the side of the AST, covering parts of the shell or bottom extension. Inspect for standing water against the AST or the indication of drainage problems. | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Concrete pad or ring wall free of cracking and spalling?                                                                                                                                                                                                                                                                                                                                                              | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Is the area around the tank concrete surface, ground, containment and free of visible signs of leakage?                                                                                                                                                                                                                                                                                                               | X   |    |     |                                                                                                                                              |
|            | 7/17      | FOUNDATION and SUPPORTS     | Visually inspect the condition of the AST's supports. Sewer cracking or spilling of concrete supports shall be noted and evaluated. If there are pad plates between the supports and the shell, inspect their condition. Inspect the supports to be sure they are sitting securely on the foundation grade. If the supports are welded to the shell, inspect the welds for visible signs of stress or deterioration.  | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Tank supports in satisfactory condition?                                                                                                                                                                                                                                                                                                                                                                              | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | FOUNDATION and SUPPORTS     | Is water able to drain away from tank if tank is resting on foundation or on the ground?                                                                                                                                                                                                                                                                                                                              | X   |    |     |                                                                                                                                              |
|            | 7/18      | CONTAMINMENT                | Identify and record the type and condition of the secondary containment, spill control, and CBOM, if present.                                                                                                                                                                                                                                                                                                         | X   |    |     | double-walled secondary elevated procedures                                                                                                  |
|            | 7/18.1    | CONTAMINMENT                | Visually inspect the general condition of the containment area to ensure that it is in good condition and that there is not a breach in the containment structure. Note changes from the original design and installation information if available.                                                                                                                                                                   | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | CONTAMINMENT                | Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?                                                                                                                                                                                                                                                                                                | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | CONTAMINMENT                | Are diked areas and valves closed and in good working condition?                                                                                                                                                                                                                                                                                                                                                      | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | CONTAMINMENT                | Are containment gages, valves, float, and any secondary containment devices in good working order?                                                                                                                                                                                                                                                                                                                    | X   |    | X   |                                                                                                                                              |
|            | 7/18.2    | CONTAMINMENT                | Verify that the drain valves are operable and in good condition. Report penetrations through the same containment area.                                                                                                                                                                                                                                                                                               | X   |    |     |                                                                                                                                              |
|            | 7/18.3    | CONTAMINMENT                | Verify that the drain valves are operable and in good condition. Report penetrations through the secondary containment that may compromise the integrity of the containment area. Report penetrations that are likely to lead to failure of the secondary containment should the liquid level of water or liquid rise to these specifications.                                                                        | X   |    |     | interstitial drain plug underneath the tank                                                                                                  |
|            | 7/19      | EQUIPMENT and PIPING        | Inspect and verify the operability of auxiliary equipment, including the following items:                                                                                                                                                                                                                                                                                                                             | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | TANK SHELL, HEADS, and ROOF | Is the tank free of visible signs of stress or leakage, due to sewer corrosion?                                                                                                                                                                                                                                                                                                                                       | X   |    |     |                                                                                                                                              |
|            | SP1 SP001 | TANK SHELL, HEADS, and ROOF | Is the primary tank free of water or has another percentage measure been taken? Refer to section 6.10 and 6.11 of the standard for Category 1 tanks.                                                                                                                                                                                                                                                                  | X   |    |     | recommended checking for water in hull annually                                                                                              |

## Tank Sketch and Photographs

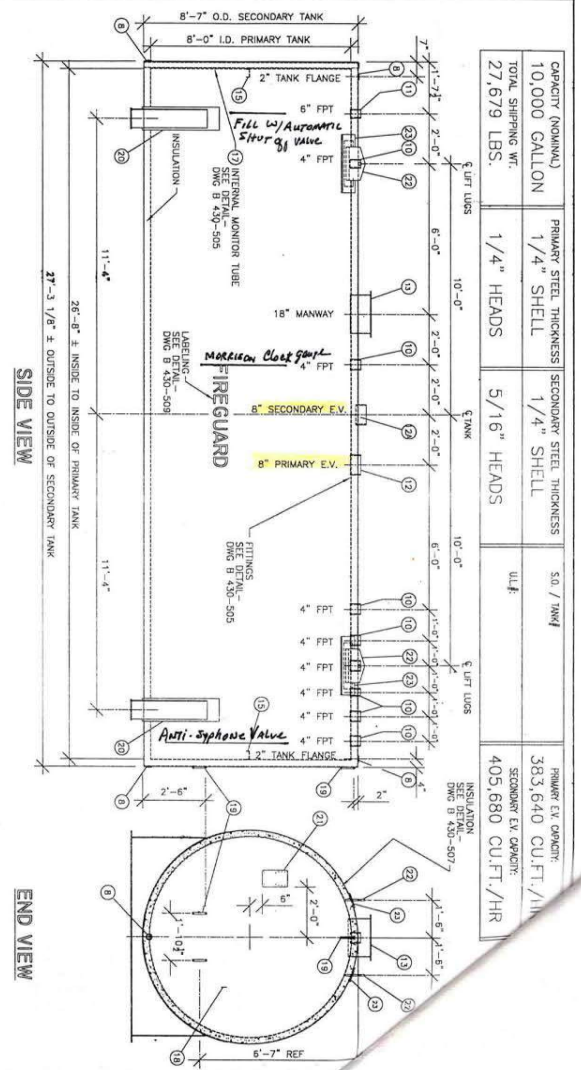
### SP1 SP001 FORMAL EXTERIOR TANK INSPECTION CHECKLIST

| Reference | Item                                                           | Guideline                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Status |    |     | Comments                                                                             |
|-----------|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----|-----|--------------------------------------------------------------------------------------|
|           |                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Yes    | No | N/A |                                                                                      |
| 72.1      | 7.2 TANK SHELL, HEADS, and ROOF<br>TANK SHELL, HEADS, and ROOF | Determine the original shell thickness of the AST. Suggested methods are:<br>Refer to the original tank documentation, such as drawings and piping logs.                                                                                                                                                                                                                                                                                                                            | X      |    |     | primary and secondary shell and primary heads thickness 1/2" - secondary heads 5/16" |
| 72.2      | RECORDS                                                        | Consult the tank manufacturer.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | X      |    |     | Figured U.S.2085                                                                     |
| 72.3      | TANK SHELL, HEADS, and ROOF                                    | Examine the tank labels for evidence of a widely accepted tank standard, such as UL 142, etc. Consult the referenced standard to determine the minimum design shell thickness.                                                                                                                                                                                                                                                                                                      | X      |    |     |                                                                                      |
| 72.4      | TANK SHELL, HEADS, and ROOF                                    | Measure the tank thickness of several areas of the tank that have no visible corrosion or pitting. The average of these measurements shall be used as the design shell thickness measurement.                                                                                                                                                                                                                                                                                       | X      |    | X   |                                                                                      |
| 73.1      | 7.3 TANK SHELL, HEADS, and ROOF<br>TANK SHELL, HEADS, and ROOF | Inspect the exterior shell and roof for signs of corrosion, including:<br>mechanical damage. Inspect the shell of the AST and the ancillary equipment (per paragraph 1.3.5) for signs of distortion and stress.                                                                                                                                                                                                                                                                     | X      |    |     |                                                                                      |
| 1.3.5     | TANK SHELL, HEADS, and ROOF                                    | At a minimum, the following tank components shall be inspected (as applicable): primary tank, secondary tank, tank supports, tank anchors, tank foundation and external supports, tank gages and alarms, overflow valves and alarms, insulation covering, tank openings, vent pipes, emergency vents, release prevention barriers, spill control systems, and tank valves and connections.                                                                                          | X      |    |     |                                                                                      |
| 73.1.1    | TANK SHELL, HEADS, and ROOF                                    | Take and record LTT readings and the location of the reading of each plate or shell course in areas accessible without entering the AST. Readings must be corrected in areas where corrosion is likely to occur. If significant internal corrosion is detected, further investigation using UST is required. If applicable, include areas marked from previous readings. Refer to Section 100                                                                                       |        |    | X   |                                                                                      |
| 73.1.2    | TANK SHELL, HEADS, and ROOF                                    | Existence of external corrosion may require the use of a pit depth measurement device in addition to the LTT to determine the remaining wall thickness. For changes made after the AST was fabricated. Refer to previous drawings or make new sketches that show all the abnormalities, attachments, and locate locations on the AST                                                                                                                                                | X      |    |     |                                                                                      |
| 73.2      | TANK SHELL, HEADS, and ROOF                                    | Is the system free of any other conditions that need to be addressed for continued safe operation?                                                                                                                                                                                                                                                                                                                                                                                  | X      |    |     |                                                                                      |
| SP1 SP001 | 7.9 RECORDS<br>7.10 RECORDS                                    | Additional requirements for field selected STS are included in Appendix B<br>In the final report, include field data, measurements, pictures, drawings, tables, and an inspection summary. In the summary, identify unacceptable conditions and recommended and/or mandatory corrective actions. Determine suitability for continued service of the AST per Section 100 and document this in the final report. Include the inspector's name and certification number in the report. | X      |    | X   |                                                                                      |
| Notes:    |                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |        |    |     |                                                                                      |

GENERAL NOTES:

PRIMARY TANK  
TANK SHELL ASSEMBLY SEQUENCE  
(NOT TO SCALE)

10,000 gallon FIRE GUARDED



|                                     |                                       |                                         |                           |                                             |
|-------------------------------------|---------------------------------------|-----------------------------------------|---------------------------|---------------------------------------------|
| CAPACITY (NOMINAL)<br>10,000 GALLON | PRIMARY STEEL THICKNESS<br>1/4" SHELL | SECONDARY STEEL THICKNESS<br>1/4" SHELL | S.O. / TANK<br>41#        | PRIMARY EV CAPACITY:<br>383,640 CU.FT./HR   |
| TOTAL SHIPPING WT.<br>27,679 LBS.   | 1/4" HEADS                            | 5/16" HEADS                             | INSULATION<br>SIC 430-507 | SECONDARY EV CAPACITY:<br>405,680 CU.FT./HR |



Photo 1. AST-1: 10,000-gallon double-walled diesel steel tank





Photo 2. AST-1: 10,000-gallon double-walled diesel steel tank

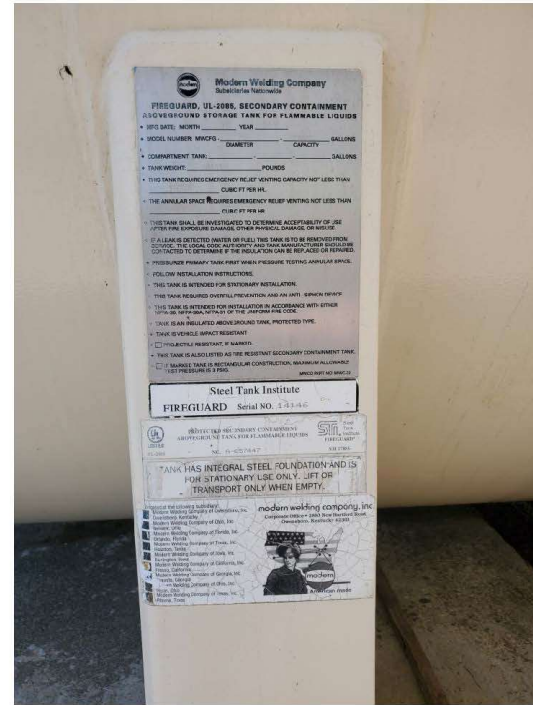


Photo 3. AST-1: Nameplate



**Photo 4.** Foundation and Supports



3-5



**Photo 5.** Foundation and Supports



3-6



**Photo 6.** Secondary containment and interstitial space insulation



3-7



**Photo 7.** Fill piping and spill box



3-8



**Photo 8.** Dispensing piping and liquid level gauge



3-9



**Photo 9.** Dispensing piping



3-10





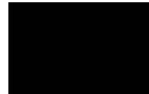
Photo 10. Dispensing piping



3-11



Photo 11. Normal vent



3-12



**Photo 12.** Emergency vents and liquid level gauge



**Photo 13.** Grounding





Permit Required!



26th California Unified Program  
Annual Training Conference  
February 26-29, 2024





# Any Questions?

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26th California Unified Program  
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