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Spill Prevention, Control and Countermeasure Plan

City of West Linn
Public Works Yard
4100 Norfolk Street
West Linn, OR 97068

Prepared For
City of West Linn


March 2014
Project #108.01060.00001

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

Prepared for:

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Public Works Yard
4100 Norfolk Street
West Linn, OR 97068**

This document has been prepared by SLR International Corporation. The material and data in this report were prepared under the supervision and direction of the undersigned.



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1. INTRODUCTION

This Spill Prevention, Control and Countermeasure (SPCC) Plan has been prepared in accordance with the United States Environmental Protection Agency (USEPA) regulations contained in Title 40 of the Code of Federal Regulations, Part 112 (40 CFR 112 – SPCC Rule). This Plan meets the requirements of the updated rule published in the November 5, 2009 Federal Register and any amendments up to the date of the Plan. This Plan follows the format of the SPCC Rule and each section heading provides the applicable 40 CFR 112 section denoted by the section sign §.

1.1 GENERAL APPLICABILITY AND PLAN PREPARATION AND IMPLEMENTATION (§112.1 AND 112.3)

The SPCC Rule is applicable to any owner or operator of a non-transportation related onshore or offshore facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines. A facility is subject to the SPCC Rule if the total aboveground storage capacity of oil and oil products exceeds 1,320 gallons; or if the underground storage capacity exceeds 42,000 gallons; and if, because of its location, the facility could reasonably be expected to discharge oil into navigable waters of the United States. Oil-filled bulk storage containers and oil-filled equipment with a capacity of less than 55-gallons, permanently closed containers, and motive power containers are not included in the total storage capacity of the facility and are exempted from requirements under the SPCC Rule.

1.2 GENERAL FACILITY INFORMATION

This SPCC Plan has been developed and certified for the following facility:

Owner: City of West Linn
Facility Name: City of West Linn Public Works Yard (or Site)
Facility Address: 4100 Norfolk Street
City and State: West Linn, OR 97068
Facility Telephone Number: (503) 656-6081
Facility Size: Approximately 2.07 acres
Site Aboveground Oil Storage Capacity: Approximately 7,600-gallons
Site Underground Oil Storage Capacity: 0-gallons
Environmental Coordinator: Transportation Supervisor
Alternate Environmental Coordinator: Environmental Services Supervisor
Telephone Number: (503) 656-6081

1.3 PROFESSIONAL ENGINEER'S CERTIFICATION (§112.3(D))

I, Mr. R. Scott Miller, a Professional Engineer (P.E.), in the State of Oregon, attest that:

- I am familiar with the requirements of the SPCC Rule;
- I, or my agent, has visited and examined the Site;
- The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC Rule;
- The procedures for required inspections and testing have been established; and
- The Plan is adequate for the Site.

Printed Name of P.E.: Mr. R. Scott Miller, P.E.

Signature of P.E.: *Raymond Scott Miller*

Registration Number: 18,697

Date: 03/07/2014

Seal and Signature of Professional Engineer:



1.4 SPCC PLAN MAINTENANCE (§112.3(E))

This SPCC Plan will be maintained onsite. Copies of the SPCC Plan will be available, upon request, to the USEPA or a duly authorized representative for review. The City of West Linn may also submit copies of this SPCC Plan to the USEPA and to the Oregon Department of Environmental Quality (DEQ) upon agency request.

1.5 AGENCY REQUIRED AMENDMENT OF THE SPCC PLAN (§112.4)

The USEPA Regional Administrator may request the Site to modify its SPCC Plan in response to a facility spill event, if the spill meets either of the following conditions:

- Discharge of oil from a single spill event exceeding 1,000 gallons; or
- Discharge of oil into or upon navigable waters of the United States or adjoining shoreline from two spill events within a 12-month period that are in excess of 42 gallons, as defined in 40 CFR Part 112.1(b).

If a spill at the Site meets the above criteria, the following information required by 40 CFR 112.4 will be provided to USEPA Region 10 Administrator and the Oregon DEQ within 60 days:

1. Name of the facility;
2. Your name;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
7. The cause of such discharge as described in §112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
9. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Upon review, the USEPA may require the Site to amend the SPCC Plan. Within 30 days from receipt of such notice, the Site would be required to submit an acceptance or appeal of the proposed amendment. If the Site accepts the amendment, the SPCC Plan would be revised within 30 days after receiving notice and the changes implemented at the Site within six months. If the amendment is appealed, the USEPA may request additional information and then render a decision within 60 days of receiving the appeal. The City of West Linn would be notified of the decision so that necessary actions may be taken.

1.6 GENERAL PLAN REVIEW AND AMENDMENT (§112.5)

The City of West Linn will review and evaluate this SPCC Plan at least once every five years. If during this review, the City of West Linn identifies alternative spill prevention and control technology that may significantly reduce the likelihood of a spill event and that has been field-proven at the time of review, The City of West Linn may implement such technology and include it in the revised SPCC Plan. The City of West Linn will also amend this Plan whenever there is a change in facility design, construction, operation, or maintenance that materially affects the potential for a release to the environment. Such amendments will be completed as soon as possible, but no later than six months after an addition or change occurs.

Technical amendments and revisions must be certified by a registered P.E. Changes to emergency contact names and other minor changes that do not affect the potential for a spill,

secondary containment, or drainage do not require the certification of a registered P.E. A record of plan review and revisions will be maintained on the “Log of Plan Review and Amendment” and “Record of Plan Reviews” that have been included as Appendix A.

1.7 QUALIFIED FACILITIES (§112.6)

The owner or operator of a qualified facility, as defined below, may self-certify their SPCC Plan, as provided in 40 CFR 112.6. A qualified facility is one that meets the following Tier I or Tier II qualified facility criteria:

- A Tier I qualified facility meets the qualification criteria of a Tier II facility and has no individual aboveground oil storage container with a capacity greater than 5,000 gallons.
- A Tier II qualified facility is one that has had no single discharge exceeding 1,000-gallons or no two discharges each exceeding 42-gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than discharges that are the result of natural disasters, acts of war, or terrorism), and has an aggregate aboveground oil storage capacity of 10,000 U.S. gallons or less.

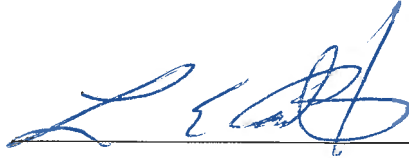
The City of West Linn Public Works Yard meets the definition of a Tier II qualified facility; however, the facility has elected not to self-certify their SPCC Plan.

2. SPCC PLAN REQUIREMENTS (§112.7)

2.1 MANAGEMENT APPROVAL (§112.7)

I hereby certify that this SPCC Plan has the full approval of the City of West Linn management and that I have the management authority to commit the necessary resources toward spill prevention.

Signature of Official: _____



Printed Name of Official: Lance Calvert

Title of Official: City of West Linn Public Works Director

Date: _____

3/21/14

2.2 CONFORMANCE WITH SPCC RULE (§112.7(a)(1) AND 112.7(a)(2))

The Plan follows the general format of the SPCC Rule; therefore, a cross-reference table is not required. This SPCC Plan also incorporates all of the applicable parts of the SPCC Rule. If this Plan deviates from a specific requirement of the SPCC Rule, that portion of the Plan will provide the equivalent environmental protection, including the reasons for nonconformance, and a detailed description of the alternate methods used to achieve the equivalent environmental protection.

2.3 SITE CHARACTERISTICS (§112.7(a)(3))

The City of West Linn Public Works Yard is located at 4100 Norfolk Street in West Linn, Oregon. The Site encompasses approximately 2.07 acres (90,114 square feet) and supports the Public Works Operations and Parks Maintenance operations for the City. The Site is mostly paved. It is located in a primarily residential area and is bounded to the east by Norfolk Street and to the west by Sussex Street. The Willamette River is located approximately 2,600 feet south of the Site. General operations at the Site include general equipment and vehicle maintenance and storage. City Water, Sewer, Storm, and Parks operations are operated from this location.

The buildings and structures at the City of West Linn Public Works Yard are described below.

- The Vehicle Maintenance Building is located in the northwestern corner of the Site.
- Offices are located in a separate building in the northeastern corner of the Site.
- The Fueling Area is located in the central portion of the Site.
- The Environmental Services Building (#4) is located near the central portion of the Site.
- A salt-based deicing vehicle and product storage is located inside Building #5, in the southern portion of the Site.

Figure 1 has been included as a Site Location Map. Figure 2 depicts the layout of the facility and the location of the oil-containing containers, and the general stormwater drainage patterns at the Site.

2.3.1 OIL INVENTORY (§112.7(a)(3)(i))

The following sections provide a list of the oil-filled bulk storage containers located at the City of West Linn Public Works Yard that has an oil storage capacity of 55 gallons or more, including the type of oil and storage capacity.

Bulk Storage Containers

Bulk storage containers are defined as any container used to store oil for the purpose of storing oil prior to use, while being used, or prior to further distribution in commerce. Typical bulk storage containers include, but are not limited to, aboveground storage tanks (ASTs), underground storage tanks (USTs), drums, and totes. Bulk storage containers can also be considered mobile or portable oil containers.

The following table identifies the bulk storage containers located at the Site. Specific information for each bulk storage container, including the available secondary containment and predicted flow is included in Table 1, Oil Containing Containers Inventory. Oil storage locations are shown on Figure 2, Site Plan and Drainage Map.

Figure Location	Container Location	Container Description	Container Contents
1	Outside at the Fueling Area	(1) 6,000-gallon Double-Walled AST <i>[dual compartment: each 3,000-gal]</i>	Gasoline and Diesel
2	Inside the Vehicle Maintenance Building	(1) 270-gallon Single-Walled AST	Engine Oil
		(1) 270-gallon Single-Walled AST	Tractor Hydraulic Fluid
		(1) 270-gallon Single-Walled AST	Synthetic Blend Oil
		(1) 270-gallon Single-Walled AST	Motor Oil
3		(~1) 55-gallon Drum	Used Oil
		(~1) 55-gallon Drum	Multi-Purpose Oil
4	Inside the Environmental Services Building (#4)	(~2) 55-gallon Drums	Food Grade Lubricant

Oil-Filled Operational Equipment

Oil-filled operational equipment, such as hydraulic units and gear boxes, are subject to the SPCC Rule, but are not subject to the rules for bulk storage containers in 40 CFR 112.8(c). The City of West Linn Public Works Yard does not operate or store any oil-filled operational equipment.

Oil-Filled Electrical Equipment

Oil-filled electrical equipment, such as electrical transformers and switchgear, are also subject to the SPCC Rule; however, oil-filled electrical equipment is not subject to the rules for bulk

storage containers in 40 CFR 112.8(c). The City of West Linn Public Works Yard does not operate or store any oil-filled electrical equipment.

2.3.2 GENERAL DISCHARGE PREVENTION MEASURES (§112.7(a)(3)(ii))

The following general discharge prevention measures are employed at the City of West Linn Public Works Yard to prevent discharges from occurring.

- Secondary containment structures are kept empty of liquids and other material to provide maximum containment capacity.
- Any evidence of leaking pipes, fittings, valves, drums, tanks, associated containers, or equipment are reported immediately to a supervisor.
- Any spill or leak is promptly abated.
- Palletized and drum shipments are inspected for leaks and corrosion prior to entering the Site.
- Designated Site employees are responsible for educating truck drivers of their duties while onsite.
- No bulk storage tanks or containers are filled without first measuring the reserve volume. Volumes are checked prior to ordering a delivery of material.
- City of West Linn employees verify product on the truck is the correct product and grade to use in filling the tank.
- Materials are transferred to and dispensed from ASTs only while employees and/or truck drivers are present and monitoring the transfer activity. No material transfers are left unattended.
- Transfer connections at the Site are locked when not in use. The connections are unlocked by employees only, prior to the transfer beginning.
- Power switches for dispensing pumps are locked in the "OFF" position when not in use.
- No employee will be allowed to operate transfer pumps or to transfer oil from container to container without having first received instruction on, and training for, spill prevention, containment, and retrieval methods.
- The AST is equipped with a mechanical device designed to stop flow when the tank is 90-95% full.
- Filling connections are equipped with a 5-gallon holding tank in the event of a minor spill during fueling.

2.3.3 BULK MATERIAL TRANSFER PROCEDURES (§112.7(a)(3)(ii))

The following material transfer procedures apply to all bulk shipments at the City of West Linn Public Works Yard, unless superseded by specific alternative directions provided in writing to operations personnel. City of West Linn Public Works Yard employees have reviewed these transfer procedures with their fuel delivery contractor.

The tanker truck driver must perform the following before and/or during the transfer.

- Have a MSDS readily available for the material being transferred.
- Verify personal protective equipment (as applicable) and spill response equipment is available and/or in place.

- Ensure that brakes are engaged and tires are chocked prior to connection of transfer hoses.
- Verify proper hose connections and valve arrangements.
- Place, or make available, large capacity catch pans for hose connections.
- Verify adequate receiving tank reserve volume.
- Start pump and check for any signs of leakage at the connections and along the length of the transfer lines. If a leak is present, immediately stop the pump, shut off the valves, repair the leak, and clean up the spilled oil.
- Observe the entire material transfer and check connections for tightness throughout the transfer operation.
- Contact a City of West Linn Public Works Yard employee immediately if a spill or release occurs.
- Initiate spill response procedures immediately if any significant leakage occurs by contacting the designated City of West Linn Public Works Yard representative and following spill response procedures in Appendix B.

2.3.4 DISCHARGE AND DRAINAGE CONTROLS (§112.7(a)(3)(iii))

Secondary containment and drainage control measures for each bulk storage container is described in Table 1.

2.3.5 SPILL RESPONSE AND REPORTING PROCEDURES (§112.7(a)(3)(iv)-(vi); 112.7 (a)(4); AND 112.7(a)(5))

The spill response, notification, and reporting procedures applicable to spills at the City of West Linn Public Works Yard are included in Appendix B of this SPCC Plan. These include the requirements for countermeasures to discharge discovery and procedures for response, cleanup (including events that require a subcontractor), disposal for recovered materials, and notification procedures. These have been included as an appendix to provide a readily usable format in the event of a release.

2.4 POTENTIAL FOR EQUIPMENT FAILURE (§112.7(b))

The typical types of failure or accidents in which oil could be discharged from the Site, based on past experience and existing operations are discussed in the following sections. The provided scenarios address the most likely discharge from the primary containment system. The flow direction and expected rate of flow from the most likely failure for each container or each piece of equipment is provided in Table 1.

2.4.1 ABOVEGROUND STORAGE TANKS

Tank Failure or Leak: Failure of an AST could be caused by damage to the tank, pump, pipe, or fitting; accidental puncture; natural disaster; or other catastrophic event. The total quantity that could be released varies, based on the total volume of the AST, but could vary from a drip to the entire contents being released at once.

Tank Loading Releases: Spills could also occur during tanker truck delivery due to overfills, leaking pipe connections, vehicular accident, or human error. The total quantity that could be

released varies, based on the total volume of the AST, but could vary from a drip to the entire contents being released at once.

2.4.2 PORTABLE STORAGE CONTAINERS

A release may occur due to corrosion, accidental puncture, natural disaster, or other catastrophic events from a portable storage container (e.g. drums, totes, or portable tanks). Spills could also occur due to human error during material transfers. The total quantity that could be released varies, based on the total volume of the container, but could vary from a drip to the entire contents being released at once.

2.5 SECONDARY CONTAINMENT (§112.7(c) AND 112.7(d))

Secondary containment for each bulk storage container located at the Site is described in Table 1. Bulk storage containers are located within secondary containment structures of sufficient capacity to contain the entire volume of the largest container, or are double-walled tanks with adequate overfill prevention measures. If a bulk storage container is stored outside and is uncovered, the containment structure will also contain adequate capacity for precipitation and the primary container volume. The City of West Linn Public Works Yard will keep all secondary containment structures free of debris and water. The Site meets the secondary containment requirements of the SPCC Rule; therefore, the impracticality determination in 40 CFR 112.7(d) is not applicable to this Site.

2.6 INSPECTIONS, TESTING AND RECORDS (§112.7(e))

See Section 3.4.6 and Table 1 for a discussion of the inspection and integrity testing program for the bulk storage containers at the Site. The inspection and integrity testing records will be maintained onsite with this SPCC Plan for a minimum of three years (see Section 3.4.6 for a discussion of the inspection forms).

2.7 PERSONNEL TRAINING (§112.7(f))

The City of West Linn Public Works Yard employees receive training in the safe handling of oil and spill prevention and response procedures by the Transportation Supervisor and/or Environmental Services Staff. This training covers site-specific information including discharge prevention and response. New oil handling personnel receive appropriate training within one month of the date that they are hired. Likewise, personnel who transfer to new jobs which involve oil-handling responsibilities receive appropriate additional training within one month of the date of transfer. Refresher training sessions are also held for the City of West Linn Public Works Yard employees annually to assure adequate understanding of this SPCC Plan. Training received will be documented and the records kept onsite with the SPCC Plan for a minimum of three years.

At a minimum, oil-handling personnel will be trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of this SPCC Plan.

The trainings will also highlight and describe known discharges or failures, malfunctioning components, and recently developed precautionary measures.

2.7.1 ENVIRONMENTAL COORDINATOR (§112.7(f)(2))

The Environmental Coordinator at the City of West Linn Public Works Yard is the Transportation Supervisor. The Environmental Coordinator reports directly to the City of West Linn management and is responsible for discharge prevention and response at the Site and ensures that employees are properly trained.

2.8 SECURITY MEASURES (§112.7(g))

The following security measures are employed at the City of West Linn Public Works Yard to help secure and control access to the oil handling, processing, and storage areas of the Site.

- Bulk oil storage locations are typically located inside buildings that are locked when the facility is not in operation.
- The entire perimeter of the Site is fenced in with 6 foot chain link fencing and is gated for vehicle access. The gates are locked during non-business hours and limited access is provided during business hours. The gates are equipped with smart card readers to allow after-hours access for needed fueling.
- During non-business hours, tank valves and controls are locked or otherwise secured.
- All bulk storage containers (except for the 6,000-gallon gasoline/diesel AST) are stored indoors and buildings are locked or otherwise secured during non-business hours.
- Delivery lines and connections are capped when not in use.
- The lighting design is adequate to detect spills and leaks at all storage and oil usage locations. Maintenance of light structures and bulb replacement is performed as required.

2.9 TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK (§112.7(h))

There are no petroleum tank car or tank truck loading and unloading racks at the Site. The industry standard definition of a tank car/tank truck loading rack is a loading rack such as would be found at a petroleum bulk distribution terminal; therefore, the requirements of 40 CFR 112.7(h) do not apply.

2.10 BRITTLE FRACTURE (§112.7(i))

Since the Site does not have any field-constructed ASTs onsite, the brittle fracture requirements under 40 CFR 112.7(i) do not apply.

2.11 CONFORMANCE WITH STATE REGULATIONS (§112.7(j))

Oregon DEQ does not have any additional oil handling, operation, design, training, or spill prevention and response regulations for facilities located in the State of Oregon. However, the

Oregon Emergency Response System and the Oregon DEQ must be notified in the event of a reportable release. The spill notification requirements are provided in Appendix B of this Plan.

2.12 QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT (§112.7(k))

The City of West Linn Public Works Yard has no qualified oil-filled operational equipment at the Site; therefore, the general secondary containment requirements found in 40 CFR 112.7(k) do not apply.

3. ONSHORE FACILITY REQUIREMENTS (§112.8)

3.1 FACILITY DRAINAGE (§112.8(b))

The Site encompasses approximately 2.07 acres of land that is primarily flat with some slight sloping toward the perimeters. The surrounding area consists of gently rolling hills at an elevation of approximately 500 feet above mean sea level. The Site is largely covered in asphalt and has numerous outbuildings in addition to an office building.

The City of West Linn Public Works Yard is located within the Willamette Valley north of the Willamette River. The topography at the Site is such that drainage flows offsite or into catch basins. The catch basins on the west side of the Vehicle Maintenance Building are connected to the onsite oil/water separator located in the wash bay area (southwestern corner of the Site). The City of West Linn plans to install an additional catch basin near the southeast corner of the fueling area that will also be connected to the existing oil/water separator.

Figure 2, Site Plan and Drainage Map, depicts the general stormwater drainage at the Site.

3.2 DIKED AREA DRAINAGE

There are no diked storage areas that have the potential to collect stormwater at the Site; bulk oil containers are either located indoors or, if located outdoors, are double-walled.

3.3 UNDIKED AREA DRAINAGE

Undiked oil storage and handling areas include the double-walled AST located in the central portion of the Site (the fueling area). Currently, drainage from this undiked oil-handling location drains southeast across the paved site, towards a catch basin with filter in the southeast corner of the Site and to Norfolk Street. A city stormwater catch basin is located in Norfolk Street, approximately 350 feet away. Norfolk Street has both curbed and unimproved street edges. This piped drainage system flows several thousand feet before discharging into the Willamette River, south of Radcliffe Drive and Imperial Drive.

The City of West Linn plans to install an additional catch basin near the southeast corner of the fueling area that will be connected to the existing oil/water separator on the Site. The oil/water separator is located in the wash bay area in the southwestern corner of the Site. Stormwater catch basins on the west side of the Vehicle Maintenance Building are currently connected to this onsite oil/water separator.

3.4 BULK STORAGE CONTAINER REQUIREMENTS (§112.8(C))

This section applies to the bulk storage containers listed under Section 2.3.1 of this SPCC Plan.

3.4.1 MATERIAL COMPATABILITY (§112.8(c)(1))

All bulk storage containers at the City of West Linn Public Works Yard are constructed of materials that are compatible with the materials stored within the containers, under the temperatures and pressures encountered under normal operating conditions. The petroleum storage ASTs are constructed of welded steel. Drums and totes are constructed of Department of Transportation (DOT) compliant containers.

3.4.2 SECONDARY CONTAINMENT (§112.8(c)(2))

The specific secondary containment for each bulk storage container at the Site is described in Table 1. According to 40 CFR 112.8(c)(2), bulk storage containers must be located within containment structures capable of containing the entire capacity of the largest single container with sufficient freeboard to contain precipitation. Double-walled tanks meet these SPCC Rule specifications, provided that the tank has adequate overfill prevention measures that include an overfill alarm, and an automatic flow restrictor and all product transfers are continually monitored (per EPA Memorandum No. OSWER 9360.8-38).

3.4.3 DIKED AREA DRAINAGE (§112.8(c)(3))

There are no diked storage areas at the Site.

3.4.4 UNDERGROUND STORAGE TANK (§112.8(c)(4))

There are no underground storage tanks at the Site.

3.4.5 PARTIALLY BURIED METALLIC STORAGE TANK (§112.8(c)(5))

There are no partially buried metallic storage tanks at the Site.

3.4.6 INSPECTIONS AND TANK INTEGRITY TESTING (§112.8(c)(6))

The bulk storage container integrity testing program has been developed in accordance with Steel Tank Institutes (STI) Standard SP-001 (5th Edition) "Standard for the Inspection of Aboveground Storage Tanks" and good engineering practices. STI developed SP-001 for smaller, shop-fabricated containers like those at the City of West Linn Public Works Yard, while the American Petroleum Steel Tank Institute (API) 653 was developed for larger, field-erected tanks.

Integrity testing is required on each bulk storage container periodically or when material repairs are made to the container. Oil-filled drums and other portable containers are stored indoors and are changed out frequently, which poses minimal risk of failure due to corrosion. Based on good engineering practices, integrity testing for these containers will consist of monthly visual inspections. The monthly inspection checklist, based on the applicable sections of "STI SP-001 Portable Container Monthly Inspection Checklist," is included in Appendix C for these containers.

According to STI's SP-001, with the exception of the large fuel oil tank, the ASTs at the Site are classified as Category 1 tanks due to the available secondary containment for each tank. The

integrity testing program for Category 1 tanks 5,000 gallons or smaller consists of periodic tank inspections. The periodic inspection program for these tanks must include the following items.

- Complete monthly visual inspections. An inspection checklist, based on the applicable sections of “STI SP-001 Monthly Inspection Checklist,” is included in Appendix C.
- Complete annual visual inspections. An inspection checklist, based on the applicable sections of “STI SP-001 Annual Inspection Checklist,” is included in Appendix C.

The 6,000-gallon double-compartment fuel oil AST is also classified as Category 1. The integrity testing program for Category 1 tanks 5,001 gallons to 30,000-gallons consists of periodic tank visual inspections as described, in addition to a formal external inspection performed a minimum of once every twenty years. This applies to the 6,000-gallon gasoline/diesel tank. The external inspection must be performed by an STI certified inspector, according to STI’s formal external inspection protocol. According to STI’s SP-001, the formal external inspection will include an inspection of the tank foundations, support conditions, type and condition of the secondary containment, drain valves, ancillary equipment, piping and piping connections, emergency vents and pressure/vacuum devices, tank level gauges, and tank shell, heads, and supports for paint failure. The interval for the initial inspection shall begin from the AST’s initial service date, if known, and at least once every twenty years thereafter. The initial service date is the date on which liquid was first placed in the tank. More frequent testing will be performed if warranted by visual inspections or integrity testing results.

Inspection reports are maintained onsite with this SPCC Plan. All inspection records are maintained for a minimum of three years.

3.4.7 INTERNAL HEATING COILS (§112.8(c)(7))

There are no internal heating coils within the bulk storage containers at the Site.

3.4.8 ENGINEERING PREVENTION METHODS (§112.8(c)(8))

Engineering prevention measures, required by 40 CFR 112.8(c)(8), are used to prevent overfills during loading and unloading of bulk storage tanks and typically consist of automatic alarms, cutoffs, etc. However, these systems are not appropriate for drums and totes present at the Site. All ASTs are equipped with visual level gauges and/or float gauges and all transfer activities are continually monitored to meet the engineered prevention measures.

3.4.9 EFFLUENT TREATMENT EQUIPMENT (§112.8(c)(9))

The City of West Linn Public Works Yard operates an oil/water separator in the southwestern corner of the Site. Some stormwater drains on the west side of the Vehicle Maintenance Building at the Site are connected to this effluent equipment. The oil/water separator is routinely inspected, along with stormwater facilities, in accordance with the City’s National Pollution Discharge Elimination MS4 Permit and Stormwater Management Plan, issued by the Oregon DEQ.

3.4.10 DISCHARGE CONTROL AND COUNTERMEASURE METHODS (§112.8(c)(10))

The City of West Linn Public Works Yard employees have been trained to promptly abate any observed discharge which results in the loss of oil from a bulk storage container. Any evidence of leaking seams, gaskets, piping, fittings, valves, pumps, rivets or bolts will be reported to supervisors and appropriate corrective actions will be taken. Discharges from bulk storage containers and associated piping and valves will be controlled by the safest and most practical means available in accordance with the spill response and reporting procedures, included in Appendix B.

3.4.11 MOBILE AND PORTABLE CONTAINERS (§112.8(c)(11))

See Table 1 for the available secondary containment for the onsite mobile and portable containers located at the Site. In general, portable containers, such as drums, are stored indoors or within appropriate secondary containment structures. If stored outdoors, the containers are located under cover within secondary containment structures with appropriate freeboard.

3.5 TRANSFER OPERATIONS (§112.8(D))

The City of West Linn Public Works Yard has implemented the following measures to protect oil transfer operations.

- There is no underground oil-filled piping located at the Site.
- If an AST is not in service or in standby for an extended period of time, the transfer point will be securely capped or a blank-flange will be placed on the transfer point.
- Aboveground piping supports have been designed to minimize abrasion and corrosion and allow for expansion and contraction.
- Aboveground valves, piping, and appurtenances connected to the ASTs are inspected as part of the monthly visual inspections.
- Warning signs are posted near the fueling station to notify vehicles of the presence of an oil transfer location.

4. SUBSTANTIAL HARM DETERMINATION (§112.20)

The City of West Linn Public Works Yard has been inspected and reviewed with respect to the Applicability of the Substantial Harm Criteria described in 40 CFR 112.20(e). The “Certification of the Applicability of the Substantial Harm Criteria” form has been completed and included in Appendix D. The City of West Linn Public Works Yard does not meet the substantial harm criteria; therefore, is not required to prepare a Facility Response Plan.

FIGURES

Figure 1 **SITE LOCATION MAP**

Figure 2 **SITE PLAN AND DRAINAGE MAP**



CITY OF WEST LINN PUBLIC WORKS YARD
 4100 NORFOLK STREET
 WEST LINN, OR 97068

Report
 SPILL PREVENTION, CONTROL AND
 COUNTERMEASURE PLAN

Drawing
 SITE LOCATION MAP

Date JANUARY 28, 2014
 File Name F1_SITE LOCATION MAP

Scale AS SHOWN
 Project No. 108.01060.00001

Fig. No. 1





Notes	
AERIAL FROM GOOGLE EARTH, 2013	
Legend	
	APPROXIMATE SITE BOUNDARY
	STORMWATER DRAINAGE DIRECTION
	STORMWATER CATCH BASIN
	FIRE EXTINGUISHER
	SPILL KIT
A) VEHICLE MAINTENANCE SHOP	
B) ENVIRONMENTAL SERVICES BUILDING (#4)	
	STORAGE LOCATION
1) OUTSIDE AT THE FUELING AREA	
2) INSIDE THE VEHICLE MAINTENANCE BUILDING	
3) INSIDE THE VEHICLE MAINTENANCE BUILDING	
4) INSIDE THE ENVIRONMENTAL SERVICES BUILDING (#4)	
<p>CITY OF WEST LINN PUBLIC WORKS YARD 4100 NORFOLK STREET WEST LINN, OR 97068</p>	
Report	SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
Drawing	SITE PLAN AND STORMWATER DRAINAGE MAP
Date	JANUARY 28, 2014
Project No.	108.01060.00001
FIGURE	2

TABLE

Table 1 OIL-FILLED BULK STORAGE CONTAINER INVENTORY TABLE

**Table 1
Oil-Filled Bulk Storage Container and Equipment Inventory Table
Spill Prevention, Control and Countermeasure Plan
City of West Linn Public Works Yard – West Linn, OR**

Figure Location	Storage Location	Container Description	Oil Volume (gallons)	Oil Type	Inspections	Potential for Failure Analysis		Transfer Procedures	Secondary Containment and Control Measures	Drainage Pathway
						Potential Failure	Estimated Rate of Flow			
OIL-FILLED BULK STORAGE CONTAINERS										
1	Outside at the Fueling Area	Double-Walled AST (1) – dual compartment	3,000	Gasoline	STI's SP-001 Monthly/Annual	Human error while filling; fueling; tank wall failure; or valve failure	50 gpm	Receipt: Gasoline fuel is delivered by vendor truck. Dispensing: Contents are dispensed using a fuel nozzle. An access card is required to dispense fuel.	This tank is double-walled and is located on top of a concrete pad surrounded by gravel and safety bollards. This tank is equipped with an emergency high level stop button, an emergency pump shutoff (adjacent on the Environmental Services Building - #4), a fire extinguisher, a warning sign, and fuel gauges. Additionally, the tank has spill buckets (located beneath the fill ports inside a contained boxed area) and is mounted with Level 4 earthquake hold downs on the concrete pad.	Releases from this tank would be contained within the interstitial space of the double-walled containment. If a leak or discharge occurred in the interstitial space, the material would flow onto the ground. If enough material were to release, it would flow downslope toward a catch basin with filter and eventually enter the city storm sewer system. The City of West Linn plans to install a catch basin near the southeast corner of the fueling area that will connect to the existing onsite oil/water separator, located in the wash bay area (southwestern corner of the Site). Once installed, released material would flow into this catch basin.
			3,000	Diesel	STI's SP-001 Monthly/Annual	Human error while filling; fueling; tank wall failure; or valve failure	50 gpm	Receipt: Gasoline fuel is delivered by vendor truck. Dispensing: Contents are dispensed using a fuel nozzle. An access card is required to dispense fuel.	This tank is double-walled and is located on top of a concrete pad surrounded by gravel and safety bollards. This tank is equipped with an emergency high level stop button, an emergency pump shutoff (adjacent on the Environmental Services Building - #4), a fire extinguisher, a warning sign, and fuel gauges. Additionally, the tank has spill buckets (located beneath the fill ports inside a contained boxed area) and is mounted with Level 4 earthquake hold downs on the concrete pad.	Releases from this tank would be contained within the interstitial space of the double-walled containment. If a leak or discharge occurred in the interstitial space, the material would flow onto the ground. If enough material were to release, it would flow downslope toward a catch basin with filter and eventually enter the city storm sewer system. The City of West Linn plans to install a catch basin near the southeast corner of the fueling area that will connect to the existing onsite oil/water separator, located in the wash bay area (southwestern corner of the Site). Once installed, released material would flow into this catch basin.
2	Inside the Vehicle Maintenance Building	Single-Walled AST (1)	270	Engine Oil (5w-30)	STI's SP-001 Monthly/Annual	Wall failure or spill in transport	10 gpm	Receipt: Oil is delivered by vendor truck and filled using a fuel nozzle. Dispensing: Contents are dispensed via an oil distribution line and pumped using a fuel nozzle.	This tank is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.
		Single-Walled AST (1)	270	Tractor Hydraulic Fluid	STI's SP-001 Monthly/Annual	Wall failure or spill in transport	10 gpm	Receipt: Oil is delivered by vendor truck and filled using a fuel nozzle. Dispensing: Contents are dispensed via an oil distribution line and pumped using a fuel nozzle.	This tank is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.

**Table 1
Oil-Filled Bulk Storage Container and Equipment Inventory Table
Spill Prevention, Control and Countermeasure Plan
City of West Linn Public Works Yard – West Linn, OR**

Figure Location	Storage Location	Container Description	Oil Volume (gallons)	Oil Type	Inspections	Potential for Failure Analysis		Transfer Procedures	Secondary Containment and Control Measures	Drainage Pathway
						Potential Failure	Estimated Rate of Flow			
2 (cont'd)	Inside the Vehicle Maintenance Building (cont'd)	Single-Walled AST (1)	270	Synthetic Blend Oil (15w-40)	STI's SP-001 Monthly/Annual	Wall failure or spill in transport	10 gpm	Receipt: Oil is delivered by vendor truck and filled using a fuel nozzle. Dispensing: Contents are dispensed via an oil distribution line and pumped using a fuel nozzle.	This tank is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.
		Single-Walled AST (1)	270	Motor Oil	STI's SP-001 Monthly/Annual	Wall failure or spill in transport	10 gpm	Receipt: Oil is delivered by vendor truck and filled using a fuel nozzle. Dispensing: Contents are dispensed via an oil distribution line and pumped using a fuel nozzle.	This tank is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.
3	Inside the Vehicle Maintenance Building	Drum (~1)	55	Used Oil	STI's SP-001 Monthly	Wall failure or spill in transport	10 gpm	Receipt: The drum is manually filled. Dispensing: The drum is picked up by a contractor when full.	This drum is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.
		Drum (~1)	55	Multi-Purpose Oil	STI's SP-001 Monthly	Wall failure or spill in transport	10 gpm	Receipt: New drums are delivered by truck. Dispensing: Contents are dispensed using a hand pump.	This drum is located inside on a concrete floor.	Releases from this tank would flow onto the concrete floor. If enough material were to release, it could exit the building and flow to a trench drain outside of the building. The drain is connected to an oil/water separator that is connected to a sanitary system.
4	Inside the Environmental Services Building (#4)	Drums (~2)	55	Food Grade Lubricant (FM AW Hydraulic ISO 32)	STI's SP-001 Monthly	Wall failure or spill in transport	10 gpm	Receipt: New drums are delivered by truck. Dispensing: Contents are dispensed using a hand pump.	This drum is located inside on a concrete floor.	Release from this drum would flow onto the concrete floor. If enough material were to release, it could exit the building and flow across the pavement, eventually offsite.

APPENDIX A


RECORD OF SPCC PLAN REVIEW AND AMENDMENT

RECORD OF SPCC PLAN REVIEW AND AMENDMENT

The City of West Linn will review and evaluate this SPCC Plan at least once every five years. The City of West Linn will also amend this Plan whenever there is a change in facility design, construction, operation, or maintenance that materially affects the potential for a release to the environment. Such amendments will be completed as soon as possible, but no later than six months after an addition or change occurs.

All SPCC Plan review and revisions are recorded in the following log and record of review:

Log of Plan Review and Revisions

Date	Review or Amendment	Description of Change or Result of Review	Management Approval	P.E. Certification
March 2014	Original Plan	Original SPCC Plan Developed	See page 5	

Record of Reviews

Statement	
"I have completed review and evaluation of the SPCC Plan for the City of West Linn Public Works Yard on _____ (Date) and will/will not (Circle one) amend the Plan as a result."	
Signature:	
Description of Change:	
Statement	
"I have completed review and evaluation of the SPCC Plan for City of West Linn Public Works Yard on _____ (Date) and will/will not (Circle one) amend the Plan as a result."	
Signature:	
Description of Change:	
Statement	
"I have completed review and evaluation of the SPCC Plan for City of West Linn Public Works Yard on _____ (Date) and will/will not (Circle one) amend the Plan as a result."	
Signature:	
Description of Change:	

APPENDIX B

SPILL RESPONSE AND REPORTING PROCEDURES

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

SPILL RESPONSE PROCEDURES

The following spill response procedures are applicable to oil and petroleum spills at the City of West Linn Public Works Yard.

First Responder Duties

If a leak, spill, or release of oil is discovered, the individual discovering the incident is the First Responder. The First Responder will attempt to locate and eliminate the source if he or she has been properly trained and this can be completed safely. The First Responder has the following responsibilities in the event of a spill:

1. Assess the safety of the situation.
2. Identify the source of the spill and turn off shut off valve and remove any other ignition source from area.
3. Secure and/or evacuate the area to protect all personnel and the public from any immediate danger.
4. Manage injuries, if applicable. Call 911 if there is a serious injury (Tualatin Valley Fire and Rescue (TVFR) should respond with spill and emergency equipment).
5. Contact the Environmental Services Supervisor or staff immediately.
6. Identify the type and quantity of the spilled material.
7. Stop the source and contain the spill if the material has been identified and can be safely handled with the equipment available, using the "Discharge Control and Countermeasure Methods" identified below. Under no circumstances shall the First Responder attempt to clean up the spill unless the hazardous properties of the material have been identified, the appropriate Personal Protective Equipment (PPE) is available, and the employee has been properly trained.
8. Complete a Spill Release Reporting Form (included at the end of this appendix).

Site Coordinator Duties

The Environmental Coordinator, as identified in Section 2.7.1, is responsible for assuming the responsibility of Site Coordinator during a spill event. If the Environmental Coordinator is not available, the most senior management employee available must act as the Site Coordinator until the Environmental Coordinator is available. The primary objectives of the Site Coordinator are, in priority order, to:

- Protect life and care for injuries;
- Protect the environment; and
- Protect property.

The Site Coordinator has the following responsibilities during a spill event:

1. Obtain a verbal report from the First Responder and any other present employee, regarding all relevant details of the spill.
2. Determine whether the First Responder tasks have been completed. If not, complete or assign these tasks before proceeding further (if needed).

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

3. Determine if outside contractors are needed to clean-up the spill. If so, monitor all contractor services to ensure proper clean-up methods are employed.
4. Determine if the appropriate regulatory agencies need to be notified. If so, follow the spill reporting section below.

Discharge Control and Countermeasure Methods

The following discharge control and countermeasures are applicable to oil and petroleum spills at the City of West Linn Public Works Yard. Discharges to land will be controlled by the safest and most practical means available, using the following procedures:

1. Identify the source
2. Stop and control the discharge, such as turning valves off or blocking the leak.
3. Secure the area.
4. Cover catch basins and/or drains with spill control mats or surround with absorbent booms to prevent liquids from entering the stormwater management system.
5. Build barriers or dams with booms or absorbent pads to prevent the spill from spreading or reaching surface water.
6. Absorb spilled material with absorbent pads or pump the material into empty drums.
7. Characterize, manage, and ship offsite all spill cleanup materials (including any contaminated soils) for appropriate disposal, according to state and federal regulations.
8. Correct or repair the equipment or container to eliminate the condition causing the release.
9. As needed, contact the appropriate agencies to report the release.

Disposal of Recovered Materials

The disposal of recovered materials will vary depending on the type, volume, and condition of the material and release. The disposal will be conducted in accordance with state and federal regulations. The Environmental Coordinator and/or the TVFR will arrange for the disposal of recovered materials.

Identification and Inventory of Spill Response Equipment

The City of West Linn Public Works Yard uses spill response materials (absorbent booms, pads, and granular loose absorbents, and personal protective equipment) as the most immediate countermeasure for management of a spill. Spill response materials are maintained throughout the Site, specifically in the Environmental Services Building (Building #4) and in the Vehicle Maintenance Building (locations are identified on Figure 2). The spill response materials are inspected periodically in conjunction with the Site's preventative maintenance system to ensure that they are adequately stocked and easily accessible.

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES
SPILL REPORTING PROCEDURES

In the event of a spill, the following internal and external notification procedures will be followed by the City of West Linn employees.

Internal Notification

In the event of a spill, the following City of West Linn Public Works Yard officials will be notified:

Official	Work Phone Number	Cell Phone Number
Transportation Supervisor	(503) 742-8616	(503) 880-9194
Lead Vehicle Maintenance Mechanic	(503) 742-8625	(503) 849-6640
Environmental Services Supervisor	(503) 742-8620	(503) 849-5038

Spill Response Contractors

In the event of a large release that the City of West Linn Public Works Yard employees do not have the training, equipment, or materials to properly cleanup, the Site will subcontract with an emergency response contractor. The City of West Linn Public Works Yard officials identified in the table above should perform all notification procedures.

External Notification

The following table summarizes the state or federal reporting agencies and their associated reportable quantities. If a reportable quantity is exceeded, then the following agencies must be notified. The City of West Linn Public Works Yard officials identified in the table above should perform all notification procedures.

Agency	Spill Threshold	Verbal Report	Phone Number	Written Report
National Response Center	<u>Soil, water or drains:</u> Chemical spills in excess of RQ or oil/fuel spills that create a sheen on water or reaches the storm drain that discharges off-site	Immediately (1 hour)	(800) 424-8802	30 days
US Environmental Protection Agency: Region 10	Oil spill to surface water: Single spill greater than 1,000 gallons or two spills within any 12-month period greater than 42 gallons	To the National Response Center as indicated above	(800) 424-8802 and (206) 553-1263	60 days
Oregon Emergency Response System	<u>Soil, water or drains:</u> Any amount of oil to waters of the state; Oil spills on land in excess of 42 gallons	Immediately (15 minutes)	(800) 452-0311	If requested by Oregon DEQ

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

Agency	Spill Threshold	Verbal Report	Phone Number	Written Report
Oregon Department of Environmental Quality: Western Regional Office	Soil, water or drains: Any amount of oil to waters of the state; Oil spills on land in excess of 42 gallons	Immediately (15 minutes)	(503) 378-8240 (800) 349-7677	If requested by Oregon DEQ
Local Contacts				
Tualatin Valley Fire and Rescue, West Linn Police, Ambulance Services			911	
Lake Oswego Emergency Communications – Nonemergency Number			(503) 635-0238	
City of West Linn Emergency On-Call 24 hour Number			(503) 635-0238 (dispatch will contact on-call West Linn staff)	
City of West Linn Environmental Services Manager			(503) 849-5038	
City of West Linn Transportation Services Manager			(503) 880-9194	
City of West Linn Public Works Director			(503) 756-1217	
Don Thomas Petroleum	If spill occurs during tanker truck loading		(503) 227-0145	
Emergency Response Contractors				
Northwest HazMat, Springfield, OR			(800) 597-1323	
Clearwater Environmental Services, Wilsonville, OR			(888) 244-1951	
Clean Harbors, Clackamas, OR			(800) 645-8265	
NWFF Environmental, Portland, OR			(800) 942-4914	

In general, when contacting the state and federal agencies, the following information should be available:

- Location of release (i.e., site address and appropriate building);
- Phone number of facility;
- Date and time of the release;

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

- Material and estimated quantity of the release (including total quantity, quantity released to water, and concentration of the material);
- The source of the release;
- A description of all affected media;
- Description of existing or potential hazards, if any;
- Personal injuries or casualties, if any;
- Resource damages, if any (dead fish, wildlife);
- Cause of the release;
- Actions being taken to stop, remove, and mitigate the effects of the release;
- Whether an evacuation may be required; and
- Name of other individuals or organizations that may have been contacted.

The instructions provided below may be used as a guide for external reporting of releases of oil, petroleum products, hazardous substances, or hazardous waste, and for documenting any contacts made with the responsible agencies.

National Response Center

A reportable release or discharge that must be reported immediately to the National Response Center (NRC) at **1 (800) 424-8802** includes:

- Hazardous substance releases exceeding CERCLA thresholds (Reportable Quantities, SARA Title III);
- Sufficient quantity to exit the Site;
- Pose a threat to human health and environment;
- Enter the stormwater sewer or sanitary sewer system;
- Enter "waters of the State" (includes surface and subsurface waters);
- Discharge causes a sheen or discoloration on the surface of a body of water;
- Discharge violates applicable water quality standards; or
- Discharge causes a sludge or emulsion to be deposited beneath the surface of the water or on adjoining shorelines.

The NRC will require the following basic information concerning the release:

- The name and telephone number of the caller;
- The name and address of the facility;
- The time and type of incident;
- The location of the spill outfall;
- The name and quantity of the material released, to the extent the information is available;
- The extent of injuries, if any; and
- The possible hazards to human health or the environment outside the facility.

The NRC will relay, if necessary, required emergency information to the U.S. Environmental Protection Agency, U.S. Coast Guard and the Virginia Department of Environmental Quality Pollution Response Program or Department of Environmental Management.

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

U.S. Environmental Protection Agency

If the NRC's number is not answered, a reportable release or discharge should be reported directly to Region 10 at **(206) 553-1263**. In addition, federal regulations require that the Regional Administrator of the USEPA be notified of certain discharges of oil to navigable waters of the U.S. or adjoining shorelines. The Regional Administrator must be notified within 60 days whenever a facility regulated under 40 CFR 112 has discharged more than 1,000 gallons of oil due to a single spill, or has discharged oil to water twice, within any 12-month period, in volumes of 42 gallons or greater twice. The notification must include the following information:

- The name of the facility;
- The name of the owner or operator of the facility;
- The facility location;
- The date on which operations at the facility commenced;
- The maximum oil storage or handling capacity of the facility, together with the normal daily use of oil;
- A description of the facility, including topographic maps, facility plot plans, and flow diagrams;
- A complete copy of the facility SPCC Plan, including any amendments;
- A description of the cause of the spill, including a failure analysis of the system or subsystem, in which the failure occurred;
- A description of the corrective actions and countermeasures taken by the facility, including a description of any repairs to equipment;
- A discussion of any additional preventive measures taken or contemplated, to reduce the possibility of a recurrence; and
- Any additional information related to the spill or the SPCC Plan that the Regional Administrator may require.

Oregon Department of Environmental Quality

In the event of a reportable spill in the state of Oregon, the National Response Center and the Oregon Emergency Response System must be notified. The responsibility lies with the person who spills the product, as well as the person owning or having authority over the oil or hazardous material. A reportable spill in Oregon must be immediately reported to the Oregon Emergency Response System at **(800) 452-0311**. A reportable spill in Oregon includes:

- Any amount of oil to waters of the state;
- Oil spills on land in excess of 42 gallons; or
- Hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal Regulations, 40 CFR Part 302 (List of Hazardous Substances and Reportable Quantities), and amendments adopted before July 1, 2002.

The release should also be reported to the Western Region office of Oregon DEQ Office at **(503) 378-8240** during regular business hours. The following information should be available when notifying the Oregon Emergency Response System and/or Oregon DEQ:

- Where is the spill?

APPENDIX B: SPILL RESPONSE AND REPORTING PROCEDURES

- What spilled?
- How much spilled?
- How concentrated is the spilled material?
- Who spilled the material?
- Is anyone cleaning up the spill?
- Are there resource damages (e.g. dead fish or oiled birds)?
- Who is reporting the spill?
- How can we get back to you?

Once the spill has been reported and cleanup is underway and/or completed, a facility may receive a letter from Oregon DEQ requesting a completed spill/release report form detailing the spill, efforts to stop the spread of the spill, cleanup and dispose of the waste. A hard copy of the report and all supporting documents should be mailed to the Oregon DEQ regional office.

APPENDIX C

INSPECTION INSTRUCTIONS AND CHECKLISTS

APPENDIX C: INSPECTION INSTRUCTIONS AND CHECKLISTS

INSPECTION CHECKLIST INSTRUCTIONS

The bulk storage container integrity testing program is based on guidelines in Steel Tank Institutes (STI) Standard SP-001 (5th Edition) "Standard for the Inspection of Aboveground Storage Tanks" and industry standard engineering practices. STI developed SP-001 for smaller, shop-fabricated containers like those at the Site and includes the following practices.

- Maintain AST records
- Monthly AST inspections
- Annual AST inspections

AST Records

Completed AST Records for each tank at the Site are maintained onsite. The purpose of the record is to track the tank specifications, construction, and secondary containment to determine the required integrity testing program. ***Completed records for each tank are maintained with the SPCC Plan for the life of the tank.***

Monthly Inspections

The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, abrasion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Checking the inventory of discharge response equipment and restocking as needed.

All problems regarding tanks, piping, containment, or response equipment must be immediately reported to the Environmental Coordinator. Visible oil leaks from container walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters. Discharged oil will be removed immediately upon discovery, in accordance with the Spill Response Procedures in Appendix B. ***Completed inspection checklists must be signed by the inspector and maintained with the SPCC Plan for at least three years.***

Monthly Inspection Guidance (ASTs):

- 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, but shall be performed by an owner's inspector who is familiar with the site and would know if a change has occurred to indicate the possibility of a developing problem.
- Upon discovery, remove standing water or liquid in the secondary containment area, interstice, or spill container promptly. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- A non-conformance item must be addressed immediately.

APPENDIX C: INSPECTION INSTRUCTIONS AND CHECKLISTS

- 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 inspection checklists for 3 years.
- **In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.**

Monthly Inspection Guidance (Drums and other Portable Containers):

- The portable container inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a certified inspector, but shall be performed by an owner's inspector who is familiar with the site and would know if a change has occurred to indicate the possibility of a developing problem.
- A non-conformance item must be addressed immediately.
- Non-conforming items important to the portable container or containment integrity may require evaluation by an engineer experienced in design, a certified inspector, or the manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed inspection checklists for 3 years.

Annual Inspections

Facility or contract personnel will perform a more thorough inspection of the fuel tanks on an annual basis. This annual inspection complements the monthly inspection described above.

Completed inspection checklists must be signed by the inspector and maintained with the SPCC Plan for at least three years. The annual inspections of the fuel tanks cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Verifying the proper function of overfill prevention systems.

Annual Inspection Guidance (ASTs):

- 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, but shall be performed by an owner's inspector who is familiar with the site and would know if a change has occurred to indicate the possibility of a developing problem.
- Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for Paint Failure.

APPENDIX C: INSPECTION INSTRUCTIONS AND CHECKLISTS

Annual Inspection Guidance (ASTs) (continued):

- Inspect:
 1. Earthen containment structures, including examination for holes, washout, and cracking in addition to liner degradation and tank settling.
 2. Concrete containment structures and tank foundations/supports, including examination for holes, washout, settling, paint failure, in addition to examination for corrosion and leakage.
 3. Steel containment structures and tank foundations/supports, including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
- Inspection of cathodic protection system, if applicable; includes the wire connections for galvanic systems and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
- Upon discovery, remove standing water or liquid in the primary tank, secondary containment area, interstice, or spill container promptly. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with the Spill Prevention, Control and Countermeasure Rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(8)(v)).
- A non-conformance item must be addressed immediately.
- 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 inspection checklists for 3 years.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspections.
- **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.**

MONTHLY INSPECTION CHECKLIST
City of West Linn Public Works Yard
West Linn, OR

Inspection Date:	
Inspector Name:	

Figure Location	Location	Container / Equipment	Tank is free of signs of water, debris, or fire hazard and free of visible signs of leakage	Tank valve is operable, in closed position, and locked	Tanks or tank valves are free of visible signs of leakage	Liquid level gauge is readable and in good condition	Piping connection is in good condition with no evidence of leaks or corrosion	Interstitial space in tank is free of visible signs of leakage	Overfill prevention equipment is in good condition (test equipment if available)	Drums/totes are stored in designated storage area with adequate access to container	Drums/totes are free of signs of distortions, buckling, denting, bulging, or visible signs of leakage
1	Outside at the Fueling Area	Double-Walled gasoline/diesel AST	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N	N / A	N / A
2	Inside the Vehicle Maintenance Building	Single-Walled engine oil AST	Y / N	Y / N	Y / N	Y / N	Y / N	N / A	Y / N	N / A	N / A
		Single-Walled tractor hydraulic oil AST	Y / N	Y / N	Y / N	Y / N	Y / N	N / A	Y / N	N / A	N / A
		Single-Walled synthetic blend oil AST	Y / N	Y / N	Y / N	Y / N	Y / N	N / A	Y / N	N / A	N / A
		Single-Walled motor oil AST	Y / N	Y / N	Y / N	Y / N	Y / N	N / A	Y / N	N / A	N / A
3		Used oil drum	N / A	N / A	N / A	N / A	N / A	N / A	N / A	Y / N	Y / N
		Multi-Purpose oil drum	N / A	N / A	N / A	N / A	N / A	N / A	N / A	Y / N	Y / N
4	Inside the Environmental Services Building (#4)	Food Grade Lubricant drum	N / A	N / A	N / A	N / A	N / A	N / A	N / A	Y / N	Y / N

Comments (Provide notes and corrective actions for any Yes responses above. If additional sheets are required, please attach):

Annual Inspection Checklist City of West Linn Public Works Yard - West Linn, OR

This inspection must be completed each year for the non-portable aboveground storage tanks. *Any item that receives "no" as an answer must be described and addressed immediately.

Inspection Date: _____

Inspector Name: _____

Figure Location	Storage Area	Containers	Tank(s) are free of holes or cracks in walls or floors	Tank(s) are free of signs of washout, liner degradation, corrosion, leakage, paint failure, or tank settling	Tank foundation and supports are free of signs of cracking, settlement, or foundation washout	Supports are free of signs of corrosion, paint failure, etc.	Water drains away from tank	Tank shell, head, and roof coatings are free of signs of coating failure	Tank shell, head, and roof are free of signs of dents, buckling, bulging, corrosion, or cracking	Tank roof is free of standing water or low points that could cause standing water	Tank vent components are moving freely and vent passageways are not obstructed for emergency vent covers, pressure/vacuum vent poppets, or other moving vent components	Tank valves are free of signs of leaks, corrosion, and damage	Anti-siphon check and gate valves are operating properly (cycle valve open and closed)	Strainer, caps, gasket seals, and bolts are clean and in good condition	Liquid level equipment is operating properly as required by manufacturer's instructions	Labels and tags are intact and readable	Interstitial leak detection equipment window is clean and clear in sight leak gauges	Interstitial leak detection wire equipment connections of electronic gauges are tight and show no signs of corrosion	Interstitial leak detection equipment has been properly tested (activate test button, if applicable)	Overfill equipment is functioning properly per the manufacturer's instructions and regulatory requirements for inspection	Overfill equipment is suited for above ground use, per the manufacturer	
1	Outside at the Fueling Area	Double-walled AST - diesel and gasoline	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	
2	Inside the Vehicle Maintenance Building	Single-Walled ASTs - engine oil	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	NA	NA	Y / N or NA	Y / N or NA	
		Single-Walled ASTs - tractor hydraulic oil	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	NA	NA	Y / N or NA	Y / N or NA	
		Single-Walled ASTs - synthetic blend oil	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	NA	NA	Y / N or NA	Y / N or NA
		Single-Walled ASTs - Valvoline oil	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	Y / N or NA	NA	NA	NA	Y / N or NA	Y / N or NA

Comments: _____

APPENDIX D
CERTIFICATION OF THE APPLICABILITY OF THE
SUBSTANTIAL HARM CRITERIA

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: **City of West Linn Public Works Yard**
Facility Address: **4100 Norfolk Street, West Linn, OR 97068**

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES _____ NO x

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

YES _____ NO x

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

YES _____ NO x

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (such that a discharge from the facility would shut down a public drinking water intake)?

YES _____ NO x

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

YES _____ NO x

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature of Official: _____



Printed Name of Official: Lance Calvert

Title of Official: City of West Linn Public Works Yard Director

Date: _____

3/2/14