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SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

R-306 SITE
DX DIVISION
TA-15

Los Alamos National Laboratory
Los Alamos, New Mexico

Prepared By:
Merrick Engineers & Architects
600 Sixth St.
Los Alamos, NM 87544
(505) 662-0606

In Conjunction with
Los Alamos National Laboratory
Water Quality and Hydrology Group (ESH-18)



15993

Revision 2: February 2002

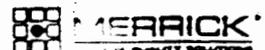


TABLE OF CONTENTS

| | |
|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Table of Contents | i |
| Certification..... | ii |
| Management Approval | iii |
| Spill Prevention Control and Countermeasure Compliance Inspection Plan Review Page..... | iv |
| | |
| 1. INTRODUCTION | 1-1 |
| 1.1. FACILITY DESCRIPTION..... | 1-1 |
| 1.2. FACILITY OWNER & OPERATOR..... | 1-1 |
| 1.3. SPILL HISTORY..... | 1-1 |
| 1.4. POTENTIAL SPILL PREDICTIONS | 1-2 |
| | |
| 2. STORAGE TANKS AND CONTAINMENT STRUCTURES | 2-1 |
| 2.1. FACILITY DRAINAGE AND STORM WATER CONSIDERATIONS..... | 2-1 |
| 2.2. SECONDARY CONTAINMENT | 2-1 |
| 2.3. SECONDARY CONTAINMENT DRAINAGE OPERATIONS | 2-2 |
| 2.4. INTEGRITY TESTING..... | 2-3 |
| 2.5. FAIL-SAFE ENGINEERING..... | 2-3 |
| 2.6. FACILITY TRANSFER OPERATIONS..... | 2-3 |
| | |
| 3. ADDITIONAL SPCC REQUIREMENTS | 3-1 |
| 3.1. INSPECTIONS | 3-1 |
| 3.2. RECORD KEEPING | 3-1 |
| 3.3. SECURITY | 3-1 |
| 3.4. TRAINING | 3-1 |
| 3.5. SPILL PREVENTION, RESPONSE & REPORTING | 3-2 |
| 3.6. PLAN AMENDMENT | 3-2 |
| | |
| Appendix A | Inspection Reports |
| Appendix B | Storm Water Discharge Records |
| Appendix C | Spill Records |
| Appendix D | Training Records |
| Appendix E | Group and Facility Contacts |
| Appendix F | Certification of the Applicability of the Substantial Harm Criteria |

CERTIFICATION

This Plan was developed pursuant to provisions of the federal regulation for oil pollution prevention, 40 CFR Part 112. Its purpose is to provide spill prevention and response measures to prevent the pollution of navigable waters from oil related spills.

In accordance with 40 CFR Part 112.3 (d), this Plan has been reviewed and certified by a Registered Professional Engineer (PE). By means of this certification, the engineer, having examined the facility and being familiar with the provisions of this regulation, attests that this Plan has been prepared in accordance with good engineering practices.

Certified by: M. E. Smith

Date: 2/28/2002

Mike Smith
Registered Professional Engineer
Deputy Facility Manager, DX Division
Los Alamos National Laboratory



2/28/2002

Management Approval

In accordance with 40 CFR Part 112.7, this Plan has the full approval of management at a level with authority to commit the necessary resources.

Facility Owner Approval:

Approved by: M. E. Smith deputy FM for Date: 2/28/2002

Tom Alexander
FMU 67 Facility Manager
Los Alamos National Laboratory

Facility Operator Approval:

Approved by: R. Boudrie Date: 2/28/02

Richard Boudrie
Group Leader
Machine Science and Technology (DX-6) and DARHT

Reviewed By: Harvey Decker Date: 2-28-02

Harvey Decker
DX-DO/ESH-18, ES&H Generalist

1. INTRODUCTION

The Spill Prevention Control and Countermeasure (SPCC) Plan is a requirement of the Oil Pollution Prevention Regulation, 40 CFR Part 112. Its intent is to prevent oil related spills from polluting navigable waters of the United States (U.S.) through the implementation of adequate prevention and response measures. With regard to Los Alamos National Laboratory (LANL), navigable waters of the U.S. include all canyons, arroyos, streams, and rivers within and surrounding LANL Technical Areas.

This SPCC Plan addresses the aboveground storage tanks 15-324-AST and 15-325-AST and associated equipment.

1.1. Facility Description

The R-306 Site is located in Los Alamos National Laboratory (LANL) Technical Area 15 (TA-15) on the mesa top to the west of Three Mile Canyon. This area operates under the direction of LANL's Dynamic Experimentation (DX) Division, and is used for high-explosives research, development, and testing. TA-15 is used specifically for detonator development for high explosives and for hydrodynamic testing. The area contains a large buffer zone to protect personnel and facilities from shrapnel from explosives tests.

This Plan addresses SPCC locations in and around the R-306 Site at TA-15. There are two (2) aboveground storage tanks, 15-324-AST, and 15-325-AST on site. Each tank has a 19,000-gallon capacity. The tanks were used in the past to supply oil to a Marx Generator that was located in building TA-15-321 at the R-306 Site. That particular Marx Generator is no longer in service and has been relocated to the parking lot outside of Building TA-15-40 at a different facility, about 2 miles west by northwest of the R-306 site. Tanks 15-324-AST, and 15-325-AST, however remain on site at R-306, and contain dielectric oil. Since the current volume of oil in each tank is not known, we will assume that they are both filled to capacity, the worst-case scenario. The tanks are both located within the same secondary containment. The piping between the tanks and the former location of the Marx Generator is underground and single-walled. These pipes shall be capped off and locked out to minimize the possibility of a spill event.

This facility is classified under the SPCC regulations as a bulk storage facility. It is not a tank car or tank truck loading and unloading facility.

1.2. Facility Owner & Operator

The Facility Owner of the R-306 Site is LANL, DX Division, FMU 67. The FMU 67 Facility Manager is responsible for safely operating the facilities and for providing responsive and reliable facilities and services to support tenants' operational responsibilities.

Historically, tanks 15-324-AST, and 15-325-AST belonged to the Machine Science and Technologies Group (DX-6). The facility tenant operator at the R-306 Site is currently the Field Operations and Experimental Support Group (DX-4), however, the tanks and the oil in them are owned by the Dual Axis Radiographic Hydrodynamic Test (DARHT) Facility. DARHT shall therefore accept, with the approval of the Facility Manager, responsibility for implementation and maintenance of the R-306 Site Facility SPCC Plan. If for any reason DARHT will not continue to manage the SPCC Plan, a memorandum of understanding will be developed between the operating tenant group/division and the Facility Manager to establish roles and responsibilities associated with the Plan, and the Plan will be properly amended and stamped by a Licensed Professional Engineer to reflect such action.

Operating Group and facility contacts are listed in Appendix E and will be updated as necessary.

1.3. Spill History

Spill Location: TA-15, R-306 site, West of structure 15-306

Date: August 12, 1991

What Spilled: Mineral Oil

Marx tank was to be partially filled for a system test. Approximately 60 gallons overflowed into and out of the unsealed end of blumlein.

CORRECTIVE ACTION TAKEN

Personnel on site reacted immediately placing absorbent materials around spill to prevent any further migration. The released material was absorbed, vacuumed, and stained soil removed with assistance from the Hazmat Team in the cleanup. Approximately 20 ft³ of waste from the cleanup was containerized and disposed of with other firing site debris.

PLANS TO PREVENT RECURRENCE

A permanent sealed cover was installed at the unsealed end of the blumlein.

1.4. Potential Spill Predictions

The following table lists the predicted direction of flow, name of the receiving canyon, total potential quantity and potential flow rate for a spill at each tank.

| Structure Number | Predicted Direction of Flow | Receiving Canyon | Total Quantity | Potential Flow Rate |
|-------------------------|------------------------------------|-------------------------|-----------------------|------------------------------|
| 15-324-AST | Northeast | Three Mile Canyon | 19,000 gallons | Dependent on size of breach. |
| 15-325-AST | Northeast | Three Mile Canyon | 19,000 gallons | Dependent on size of breach. |

2. STORAGE TANKS AND CONTAINMENT STRUCTURES

To prevent discharged oil from reaching a navigable water of the U.S., appropriate storage tanks, containment structures, ancillary equipment, and management procedures are in place at the R-306 Site. The following sections address items associated with the storage tanks and containment structures including facility drainage, storage tank descriptions, secondary containment for the AST's and associated storm water drainage, integrity testing, fail-safe engineering, and transfer operations.

2.1. Facility Drainage and Storm Water Considerations

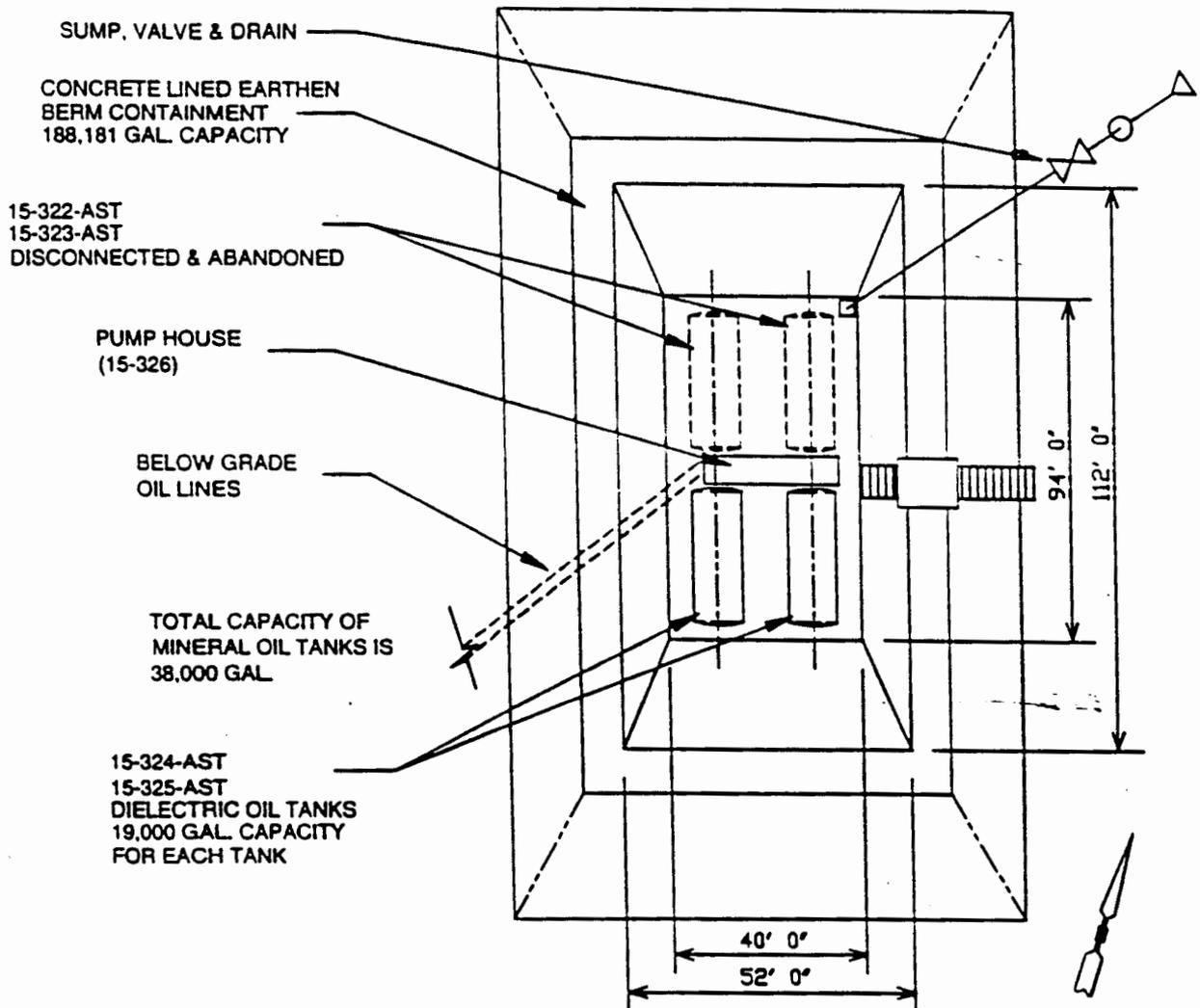
The R-306 Site and surrounding area is relatively flat and well vegetated, with a slight slope downward to the northeast. There are no watercourses or arroyos that run across the site. The site is also partially surrounded by a berm that would be instrumental in preventing storm water from running onto the site from the south and west.

There is a catch basin that drains storm water from the northwest portion of the R-306 Site. The outlet for this basin is to the northeast of the site. The drain line is equipped with a locking valve that is located at the beginning of the culvert run next to the catch basin.

2.2. Secondary Containment

Oil storage tanks 15-324-AST and 15-325-AST are located below grade. The excavated area has been bermed and lined with concrete to form a secondary containment unit for the tanks. The capacity of the secondary containment unit is approximately 188,180 gallons. This volume is large enough to contain the total volume of the tanks plus the volume of storm water produced by a 3-inch rainfall. The containment unit is also equipped with a drop inlet and drain line to discharge storm water accumulations. The drain line is equipped with a lockable valve. The transfer pump and controls for the underground transfer-piping that runs between the AST's and the former location of the Marx Generator are located within the tank secondary containment in Building TA-15-326 next to the AST's.

The schematic below shows the location of ASTs 15-324 and 15-325 within the secondary containment unit. Also identified is the location of the containment discharge drain and valve, pump house, associated piping, and abandoned ASTs 15-322 and 15-323.



Aboveground Storage Tanks 15-324 & 15-325 Schematic

2.3. Secondary Containment Drainage Operations

Storm water and snow melt occasionally accumulate within the secondary containment unit. During warmer months, storm water will evaporate. Remaining accumulations can be drained onto the mesa top and into nearby Three Mile Canyon via the containment discharge valve and drain.

Prior to discharge, accumulations must meet federal and state water quality standards. To ensure compliance with these standards, the following steps will be used for secondary containment unit discharge operations:

- Visually inspect accumulation to ensure that the water does not possess oil sheen, odor, or other constituents that could result in a harmful discharge.
- Notify facility ES&H prior to a discharge.
- Notify ESH-18 at 665-4752 to obtain authorization for release and for testing of contaminants and pH, if necessary.
- Properly record each drainage operation. Include the time, date and employee who performed the operation. (Records will be kept in Appendix B of this document in accordance with Section 3.2.)

The discharge valve for the secondary containment unit shall be locked when not in use.

2.4. Integrity Testing

40 CFR Part 112, Section 7(2)(vi) states, "Aboveground tanks should be subject to periodic integrity testing, taking into account tank design and using such techniques as hydrostatic testing, visual inspection or a system of non-destructive shell thickness testing." Integrity testing incorporates both visual and internal inspection to determine the structural integrity of a storage tank, its associated piping, and its support structures. Such testing must be conducted by a certified inspector. API standards 510 and 653 are the primary U.S. industry standards for storage tank inspection and testing.

Visual inspections will be performed by the operating group on a routine basis consistent with the particular site conditions. The time between inspections, however, shall not exceed one month. All storage vessels will be given a formal visual external inspection by a qualified inspector every five years or at the quarter corrosion-rate life of the shell, whichever is less. The time between internal inspections for the AST shall not exceed 20 years. The integrity testing interval for the AST will be primarily derived from the service history of the tank and manufacturer's recommendation.

Tank inspection history reports form the basis for integrity testing record keeping. Records shall include all examinations and tests; conditions found, thickness measurements, settlement measurements, repairs/alterations, and recommendations. Inspection records are retained in Appendix D of this document in accordance with Section 3.2.

2.5. Fail-Safe Engineering

The level of liquid in the AST's is determined by periodic visual observation. There is no liquid level alarm system or other monitoring devices.

The quantity of oil in the tanks is not known; therefore, it is assumed that they are each at full capacity (19,000 gallons each).

2.6. Facility Transfer Operations

Since the tanks are off line, there are no transfer operations procedures in place.

This facility is not designated as a tank car or tank truck loading and unloading facility. Any removal or additional filling of the AST shall follow facility specific and Department of Transportation procedures and regulations. The oil transfer pumps and valves shall be accessible for use of authorized personnel only, and shall be locked out and tagged out.

3. ADDITIONAL SPCC REQUIREMENTS

In addition to requirements specific to storage tanks and containment structures, 40 CFR Part 112 requires the development of procedures associated with inspections, record keeping, security, training, spill prevention, and Plan amendment. The following sections address implementation of these requirements at the R-306 Site.

3.1. Inspections

In addition to the integrity testing of the AST's described in Section 2.4, other types of inspections to be performed that are related to oil spill prevention are outlined below.

WALK AROUND INSPECTIONS

Aboveground Storage Tanks 15-324-AST and 15-325-AST shall undergo monthly visual walk-around inspections to observe the conditions of the tank shells, tank foundations, secondary containment, locking storm water outlet shut-off valve, pump house works, bleeder valves, oil transfer shut-off and bypass valves, exposed piping, and general good housekeeping practices. Each inspection shall be documented in writing on an inspection form, and kept with the SWPP Plan for a period of no less than 3 years. Any leaks or potential problems shall be brought to the attention of the Facility Manager for FMU 67 to evaluate the need for response.

SPILL CONTROL MATERIAL INVENTORY

Spill control material stores at the R-306 Site shall be inventoried semi-annually to assure that the proper materials are available in sufficient quantity and of sufficient quality to minimize the spread of oil products in the case of a spill prior to the arrival of response teams.

3.2. Record Keeping

The inspections identified in Section 3.1 shall be documented on the applicable form in Appendix A. These inspection reports identify the date the inspection was performed, noted observations or measurements, and the name and signature of the inspector. Completed inspection reports will be maintained in the SPCC Plan in Appendix A.

Additional records that will be kept as they are generated include spill reports, secondary containment unit storm water discharge records, and training records. In the event of a spill, the spill tracking form in Appendix C will be used to describe the spill, corrective actions taken, and plans for preventing recurrence. Copies of spill reports will also be retained in Appendix C. Storm water discharge records will be retained in Appendix B, and training records will be maintained with the LANL Employee Development System (EDS) and in accordance with LANL's Training Standard LS113-09.0, *Training Documentation*, or within Appendix D.

All inspection records, spill reports, and other applicable data and documentation will be kept with this Plan and retained for a period of at least three years. All original official records will be kept with the SPCC Plan at the FMU Office building TA-8-21.

3.3. Security

TA-15 is restricted to badged and cleared or escorted personnel. Control pumps shall be locked and accessible to only authorized personnel at all times. With the existing site security measures the current lighting for this facility is adequate. LANL security personnel regularly patrol the facility and its surrounding area.

3.4. Training

40 CFR Part 112.7 (10) states, "Owners or operators are responsible for properly instructing their personnel in the operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control laws, rules and regulations." To fulfill this requirement, formal employee training shall be

conducted at least annually, and more often when needed, to ensure that all site workers have an adequate understanding of the SPCC Plan for the facility and the individual responsibilities of each involved employee. Training topics shall include the following.

- Goals and objectives of the SPCC program
- Additional applicable pollution control laws, rules, and regulations
- Practices for preventing spills
- Procedures for responding properly and rapidly to spills
- Protocol used to report spills
- Operations and maintenance of equipment
- Spill events or failures
- Malfunctioning components
- Recently developed precautionary measures

These and other associated topics may also be covered during routine employee meetings.

Training activities shall be documented in the LANL Employee Development System (EDS), and in Appendix D, to be in accordance with LANL's Training Standard LS113-09.0, *Training Documentation*. Informal briefings shall be documented by recording the attendance and maintaining a file of the meeting roster.

3.5. Spill Prevention, Response & Reporting

Spill prevention for the R-306 Site is achieved primarily through proper implementation of the SPCC Plan. This effort includes training employees on appropriate spill prevention and work procedures and performing inspections and maintenance activities to minimize the potential for equipment failure. The designated individual for tanks 15-324-AST, and 15-325-AST who is accountable for oil spill prevention and who reports to line management is the DX Official/Facility Management Designee.

All incidents at the R-306 Site shall be immediately reported to the DX Officer/Facility Manager Designee at 104-2926 or 664-2926 (digital pager – enter your phone number followed by #). The DX Officer/Facility Manager Designee will then contact the appropriate personnel to address the incident. In the cases of injury, explosion, or fire, dial 911 and report the situation before contacting the DX Officer/Facility Manager Designee. If the DX Officer/Facility Manager Designee cannot be reached, the incident shall be reported to the Emergency Management Office at 667-6211, or after hours at 667-7080.

Required LANL spill reports will be completed by the organization responsible for overseeing site operations, and copies of the reports will be maintained by both the responsible organization and the LANL Water Quality & Hydrology Group, ESH-18. The federal reporting of spill events is the responsibility of ESH-18, and the determination for such notification will be made by ESH-18 and the EM&R Office in accordance with Laboratory and DOE policies, and federal and state regulatory reporting requirements.

Information on each spill (date, spill location, what spilled, quantity spilled, corrective action taken, and plans to prevent reoccurrence) shall be noted in the Spill Tracking Log in Appendix C of this plan. In addition, a copy of each Spill Event Report will be filed in Appendix C of this SPCC Plan.

3.6. Plan Amendment

This SPCC Plan will be amended whenever there is a change in facility design, construction, operation or maintenance that materially affects the facility's potential for discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. The Plan will also be amended as necessary if a spill

causes a change in design, construction, operation, or maintenance. Such amendments shall be fully implemented as soon as possible, but not later than six months after such change occurs.

In addition, in accordance with 40 CFR 112.5(b), a complete review and evaluation of this SPCC Plan will be conducted at least once every three years by the Facility Manager, and by ESH-18. As a result of this review and evaluation, the SPCC Plan will be amended and stamped by a Licensed Professional Engineer within six months of the review to include more effective prevention and control technology if:

- 1) such technology will significantly reduce the likelihood of a spill event from the facility, and
- 2) such technology has been field proven at the time of review.

Changes to inspection forms, the spill contact list, the addition of records to the Plan, or development of a memorandum of understanding between the operating group/division and the FMU modifying the distribution of responsibilities do not require certification by a Professional Engineer. All other amendments to the SPCC Plan shall not be effective to satisfy the regulatory requirements governing the document unless they have been certified by a Licensed Professional Engineer.

Appendix A

Inspection Reports

Los Alamos

Los Alamos National Laboratory

Los Alamos, New Mexico 87545

WALK-AROUND INSPECTION FORM

ABOVEGROUND TANKS
ASSOCIATED PIPING &
MARX GENERATOR

General Site Information

| | | | |
|--------------------|----------------------------------------------------------|---------------------|----------------------------------------------------------|
| Inspection Date: | | Inspector: | |
| Technical Area: | | Structure #: | |
| Tank Contents: | | Capacity Tank: | |
| Adequate lighting: | Yes <input type="checkbox"/> No <input type="checkbox"/> | Is facility fenced? | Yes <input type="checkbox"/> No <input type="checkbox"/> |

Storage Unit Condition

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| Describe general condition of tank and support structure, valves, and/or piping (signs of rust, leakage, tank residing in water, cracks in foundation, no labels, etc.): | |
| Any change in tank content's volume? | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Grounding Wires: | Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> N/A <input type="checkbox"/> |
| Level Gauge: | Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> N/A <input type="checkbox"/> |
| Liquid Level Alarm System: | Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> N/A <input type="checkbox"/> |
| Foundation Condition: | Good <input type="checkbox"/> Poor <input type="checkbox"/> N/A <input type="checkbox"/> |
| Flanges, Valves, Nozzles and Piping: | Good <input type="checkbox"/> Poor <input type="checkbox"/> N/A <input type="checkbox"/> |
| Ladders or Stairs: | Good <input type="checkbox"/> Poor <input type="checkbox"/> N/A <input type="checkbox"/> |
| Transfer Pump: | Good <input type="checkbox"/> Poor <input type="checkbox"/> N/A <input type="checkbox"/> |

Secondary Containment Condition

| | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| Describe general condition of containment unit (storm water accumulation, presence of oil or other material, signs of damage, leaks, cracks, erosion, status/condition of discharge valve, etc.): | |
| Storm water discharge valve: | Locked <input type="checkbox"/> Unlocked <input type="checkbox"/> No valve <input type="checkbox"/> |
| Sump? (if yes, describe in comments below): | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Containment liner (for earthen berms): | Good <input type="checkbox"/> Poor <input type="checkbox"/> No liner <input type="checkbox"/> |
| Storm Water Accumulation in Containment Unit: | Yes <input type="checkbox"/> No <input type="checkbox"/> |
| Oil accumulation in dike or collection sump: | Yes <input type="checkbox"/> No <input type="checkbox"/> |

Marx Generator Condition

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Describe general condition of Marx Generator (changes in the conditions of gaskets; any previously identified leaks, new leaks and potential problems; secondary containment condition; etc.): | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

Comments:

Items Requiring Corrective Actions:

Corrective actions taken (give dates):

Date:

Appendix B

Storm Water Discharge Records

SECONDARY CONTAINMENT STORMWATER DISCHARGE RECORD

LOCATION: TA-_____ Bldg. _____

DESCRIPTION OF TANK: _____

USER GROUP: _____ CONTACT PERSON: _____

PHONE: _____ PAGER: _____

*DATE AND TIME OF DISCHARGE: _____

*DURATION OF DISCHARGE: _____

*VOLUME OF DISCHARGE: _____

DESCRIPTION OF CONTAINMENT: _____

ESH-18 CONTACT OR DESIGNEE: _____

SAMPLES TAKEN: YES NO (If Yes, complete sampling form)

DISCHARGED RECOMMENDED: YES NO (Complete comment section below)

COMMENTS: _____

*Information to be completed by User Group

Complete the discharge record and return to Robin Reynolds, ESH-18, MS K497

REVIEWED BY: _____ DATE: _____

Appendix C

Spill Records

Appendix D

Training Records

Appendix E

Facility Owner/Operator and Contacts

Facility Owner

Dynamic Experimentation (DX) Division Facility Management (FMU 67)
University of California (UC)
Los Alamos National Laboratory (LANL)

Facility Owner Contacts

| <i>Name</i> | <i>Phone</i> | <i>Pager</i> | <i>Title</i> |
|---------------|--------------|--------------|---------------------------|
| Tom Alexander | 667-6471 | 104-2083 | FMU 67 Facility Manager |
| On call FMD | | 104-4444 | Facility Manager Designee |
| Harvey Decker | 667-1616 | 104-7568 | ES&H Generalist |

Facility Operator

Dynamic Experimentation
The Dual Axis Radiographic Hydrodynamic Test (DARHT) Facility
University of California (UC)
Los Alamos National Laboratory

Facility Operator Contacts

| <i>Name</i> | <i>Phone</i> | <i>Title</i> |
|-----------------|--------------|--------------------|
| Richard Boudrie | 665-5833 | DARHT Group Leader |

Appendix F

Certification of the Applicability of Substantial Harm Criteria

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: R-306

Facility Address: TA-15-306

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

Yes No

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

Yes No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in accordance with EPA 40 CFR 112, App. C) 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 DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" and the applicable Area Contingency Plan.

Yes No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in accordance with EPA 40 CFR 112, App. C) such that a discharge from the facility would shut down a public drinking water intake?

Yes No

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

Yes No

CERTIFICATION

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

M. E. Smith
Name (please type or print)

M. E. Smith
Signature

Deputy Facility Manager
Title

2/28/2002
Date