(TA-21 Permit)
Permit

SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

FOR THE

TA-21 GENERATOR ABOVEGROUND STORAGE TANK

Los Alamos National Laboratory

Prepared By:
Merrick Engineers & Architects
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In Conjunction with
Los Alamos National Laboratory
Water Quality and Hydrology Group (ESH-18)

Revision 1: March 2002

MERRICK
BUILDING QUALITY SOLUTIONS

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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: Terrill W Lemke Date: 3-29-02

Terrill W. Lemke
Registered Professional Engineer
Merrick & Company

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/Operator Approval:

Approved by: JR Grace for REG Date: 3-28-02

Robert Grace
ESA-FM Group Leader

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN REVIEW PAGE

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every three years. As a result of this review and evaluation, the SPCC Plan will be amended 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) if such technology has been field proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Review Dates	Signature	Name	Title	Amended & Stamped (yes/no)

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 (TAs).

Due to LANL's diverse activity and changing conditions, a single Plan incorporating all LANL facilities subject to SPCC requirements is impractical. Therefore, SPCC locations are addressed according to their Facility Management Unit (FMU). The FMU, under the direction of the Facility Manager (FM), or the facility tenant with approval from the FM, develops, implements, and maintains SPCC Plans for the specific SPCC location(s) within their stewardship. Under SPCC regulations, LANL is classified as a bulk storage facility.

This SPCC Plan addresses the diesel aboveground storage tank (AST) and piping that are associated with the backup generator system at the TA-21 tritium facilities. This Plan replaces the previous TA-21 tank generator SPCC Plan.

1.1. Facility Description

The TA-21 Tritium Science and Fabrication Facility (TSFF) conducts research on tritium recovery and analytical systems and supports neutron tube and tritium projects at WETF. TSFF is located in the northeast portion of Los Alamos National Laboratory, on the east side of the Los Alamos town site. It is situated on a mesa top bordered by DP Canyon to the north and Los Alamos Canyon to the south. Both canyons are tributaries to the Rio Grande River, approximately 8 miles to the east.

The AST addressed by this SPCC Plan is located within TSFF on the south side of building TA-21-166. This tank is a supply source for a backup power generator located within the building. Over the next few years, the TA-21 tritium operations will be moved to TA-16. TA-21 will then be decontaminated and decommissioned. The generator and its associated tank will remain operational at the facility until the quantity of tritium drops low enough such that it is no longer classified as a nuclear facility.

1.2. Management Responsibilities

TSFF is located within the boundary of FMU 70. The FMU-70 Facility Manager has the responsibility for the SPCC Plan. As such, the duties of the FMU-70 FM include:

- Implement the requirements of the SPCC Plan at the FMU level
- Maintain and amend the SPCC Plan as appropriate
- Ensure that employees involved in operation procedures receive LANL Hazcom training which covers spill prevention, control, and cleanup methods; are made aware of the intent of the regulatory requirements of the SPCC Plan by reading this Plan; and receive any additional training provided by the LANL Water Quality & Hydrology Group (ESH-18)
- Prepare and maintain records of training activities
- Maintain additional records associated with this Plan in accordance with Section 3.2
- Ensure that containment structures and spill control equipment are appropriate for the materials used
- Conduct walk-around inspections and follow-up corrective action to remedy deficiencies

The FMU-70 FM must ensure that an approved SPCC Plan exists for TA-21 project operations. However, given the authority of the FM to control support and services personnel who perform facility maintenance functions, the FM may designate another individual to oversee these duties.

1.3. Facility Owner & Operator

The TA-21 generator tank and associated equipment is owned and operated by the Engineering Sciences and Applications (ESA) Division. Owner and operator contacts for the facility are:

Facility Owner & Operator
Engineering Sciences & Applications (ESA)
University of California (UC)
Los Alamos National Laboratory

Facility Contacts

Name	*Phone*	*Pager*	*Title*
Robert Grace	667-9011		ESA Facility Manager
On call FMD		104-6679	Facility Manager Designee
Dee Hoisington	667-9748	996-0606	Facility Coordinator

1.4. Spill History and Potential Spill Predictions

There have been no reportable oil spills at the TA-21 facility associated with the diesel generator tank since its installation. Items that due possess a spill potential include the AST, its associated transfer piping to the generator, the generator building equipment, and AST filling operations. Predictions of discharge quantities and flow directions for each follow.

Aboveground Storage Tank

Quantity: A catastrophic rupture of the tanks could discharge a maximum of 2,000 gallons.

Direction: A tank release would flow into the 3,900-gallon capacity secondary containment unit in which it resides. In the unlikely event that a release from the containment unit occurred, the contents would flow south toward a storm drain that discharges to Los Alamos Canyon.

Transfer Piping

Quantity: A rupture of the transfer piping would result in only the loss of the contents of the lines. This volume would be no more than a few gallons.

Direction: A release from the transfer piping would accumulate in a low area against the curb on the north side of the AST's secondary containment unit.

Generator Building Equipment

Quantity: A rupture or leak inside the generator building from the generator, the pump, or the day tank would discharge only the oil from inside the equipment or day tank. This volume would be less than a few gallons.

Direction: A release would be contained in drip pans and diked containment areas inside the building.

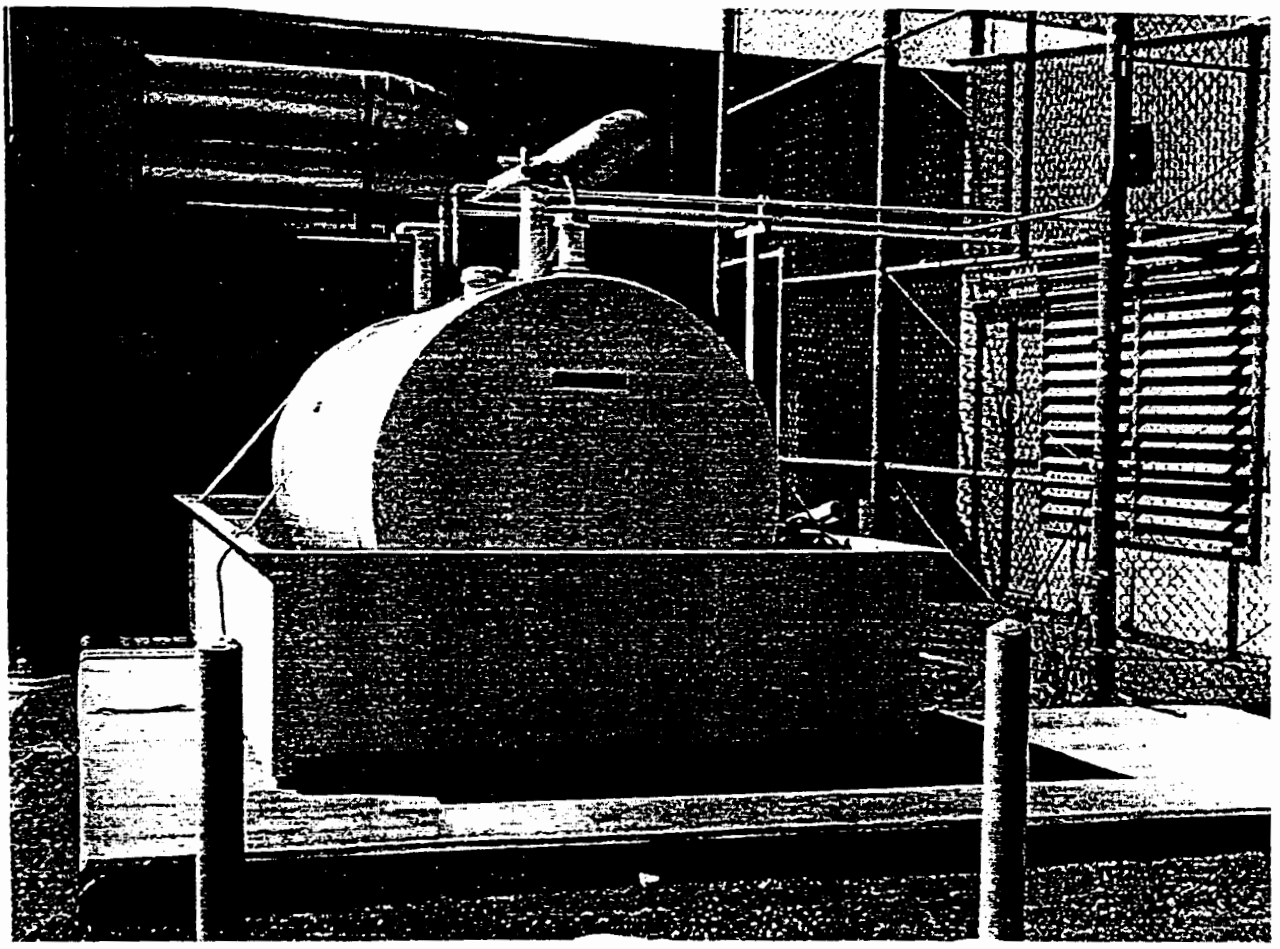
Filling Operations

Quantity: Due to operator observation and the ability to cease transfer operations, it is unlikely that more than a few gallons would be released in the event of a spill.

Direction: A release would flow south toward a storm drain that discharges to Los Alamos Canyon.

2. STORAGE TANK AND CONTAINMENT STRUCTURE

To prevent discharged oil from reaching a navigable water of the U.S., appropriate storage tanks, containment structures, and ancillary equipment and management procedures are in place for the TA-21 generator tank. The following sections discusses storage tank descriptions, secondary containment and its drainage, fail-safe engineering, and loading/unloading procedures.



2.1. Tank and Secondary Containment Description

The 2000-gallon AST is made from A-36 mid steel, which is compatible with the storage of diesel fuel. It is housed within a steel secondary containment unit structure located on a concrete base. The containment unit measures 8.5 feet wide, 15.5 feet long, and 4 feet deep, with storage capacity of approximately 3,900 gallons. This volume is sufficient to contain the entire contents of the tank plus an additional 10 percent freeboard for precipitation accumulations. The secondary containment unit is sufficiently impervious to contain diesel fuel.

There are no buried, partially buried, or mobile tanks associated with this SPCC Plan. Internal heating coils are not used in the TA-21 generator tank or associated piping and equipment.

2.2. Secondary Containment Drainage Operations

Because there is no storm water run-on into the tank secondary containment, storm water accumulations are usually small and are allowed to evaporate. There is one drainage plug at the base of the containment unit that is bolted shut. If drainage were required, the containment area could also be

emptied by portable equipment (e.g. pumps and hoses). To date, no drainage from the containment unit has been necessary.

In the event that secondary containment drainage is necessary, accumulations must meet federal and state water quality standards prior to discharge. 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 an 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 contaminates and pH, if necessary
- Remove the pump or seal the discharge plug shut after the drainage operation is complete
- Complete the Secondary Containment Storm Water Discharge Record form contained in Appendix B.

Discharge records will be as part of this SPCC Plan in accordance with Section 3.2.

2.3. Fail-Safe Engineering and Transfer Operations

The TA-21 generator tank is monitored by a liquid level gage and alarm that is read from the control room. The alarm system is tested monthly, but the actual level reading is not verified. Any identified problems associated with the system are promptly corrected.

Oil is transferred to the generator by aboveground piping that is supported by standard supports, which minimize abrasion, corrosion, and sagging, while allowing for expansion and contraction. Bollards prevent vehicle access to the aboveground piping. There are no buried pipes.

2.4. Tank Refilling Operations

The TA-21 generator tank has only been refilled once. The refill of the generator tank, performed by JCNNM, was necessary because the fuel was consumed by the generator during the blackouts associated with the 2000 Cerro Grande Fire. Records of fill procedures were not maintained with the SPCC Plan.

The area where refueling operations would take place does not have dikes, oil catch basins, or a diversion system. Therefore, when refilling and/or emptying of the AST occurs, such action will be performed in accordance with the Department of Transportation procedures and guidelines contained in Appendix D.

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 facility.

3.1. Inspections

Inspections associated with the TA-21 generator tank include visual walk-around inspections, integrity testing of the tank, and pressure testing of the piping. Procedures for each are detailed below.

Visual Walk-Around Inspections:

Visual walk-around inspections are conducted both monthly and quarterly by either the Facility Coordinator or an operator. Monthly inspections, which assesses the condition of the tank shell, foundations and supports, piping, secondary containment unit, pumps, valves, ground wires, and fail-safe engineering systems are performed using the Walk-Around Inspection Form located in Appendix A. Quarterly inspections are conducted using the OSR procedures also contained in Appendix A. These procedures focus on both generator and tank condition, assessment of fluid levels, monitoring system functionality, and general identification of problems. In the event of a problem, the deficiency is documented on the applicable inspection form and corrective action is taken through the Facility Work Control process.

Integrity 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. American Petroleum Institute standards 510 and 653 are the primary U.S. industry standards for storage tank inspection and testing, and such testing is conducted by a certified inspector. Records associated with integrity testing shall include all examinations and tests, conditions found, thickness measurements, settlement measurements, repairs/alterations, and recommendations.

The AST and its associated piping and support structures 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. Pressure testing of the piping shall be performed in association with integrity testing.

3.2. Record Keeping

The inspections identified in Section 3.1 are documented on the applicable forms found within Appendix A. These inspection reports identify the date the inspection was performed, facility/structure conditions, identified deficiencies; and contain the signature of the inspector. Completed inspection reports will be maintained as part of the SPCC Plan.

Additional records that will be kept as part of the SPCC Plan as they are generated include spill reports, secondary containment unit storm water discharge records, and integrity testing reports. In the event of a spill in excess of one quart, the spill tracking form in Appendix C will be used to describe the spill, corrective actions taken, and plans for preventing recurrence. Any discharge of storm water from the secondary containment unit will be identified through completion of the form in Appendix B. A copy of the completed form will also be sent to ESH-18.

ESA required training will be documented in the Employee Development System (EDS), in accordance with LANL's Training Standard LS113-09.0, *Training Documentation*. Informal briefings and any additional training will be documented by recording the attendance and maintaining the meeting rosters as part of the SPCC Plan.

Signed inspections, drainage records, spill reports, and integrity testing records will be retained as part of this SPCC Plan for a period of three years. Following completion of the three-year period, the records will be forwarded to the ESH Records Management Team to be retained in accordance with Department of Energy requirements.

3.3. Security

SPCC requirements dictate that storage facilities be fenced and locked or secured when the facility is not attended or in operation. TA-21 is surrounded by a perimeter security fence, which is closed between the nonworking hours of 7 pm and 6 am. During nonworking hours, LANL security personnel patrol the area. In addition to restrictions on facility access, pumps and valves are located within a locked building. A streetlight located adjacent to the tank provides adequate lighting around the tank to facilitate the discovery of a spill.

The TA-21 generator tank does not contain any master flow and drain valves. An inlet/outlet on the top of the tank can be used to fill or drain the tank. The inlet/outlet cap is not locked, but other than through transfer to the generator, diesel can only be removed through pumping or siphoning via the inlet/outlet on the top of the tank. Transfer piping connections are wielded to prevent loosening or disconnecting of the transfer piping. Starter controls for the transfer of diesel to the generator are located within a locked building.

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 minimize the potential to discharge oil, ESA facility operators are familiar with and have access to Operation & Maintenance manuals applicable to the generator and AST. They also can request information or clarification from manufacturer representatives and ESA-FM and ESH-18 personnel.

Operators are made aware of SPCC regulatory requirements by required reading of this SPCC Plan and any additional training/briefings provided by ESH-18. Prior to the initiation of work, they also receive LANL Hazcom training which covers spill prevention, control, and cleanup methods. Information on known spill events or failures is provided through the 4003(b) Lessons Learned process or briefings supplied by ESH-18.

The JCNNM generator maintenance and AST refueling crew undergo SPCC training provided by JCNNM.

3.5. Spill Prevention, Response & Reporting

Spill prevention includes training employees on appropriate spill prevention and work procedures and performing inspections and maintenance activities to minimize the potential for equipment failure. Work is also performed using LANL's five step Integrated Safety Management approach, which evaluates a task and identifies potential hazards such as a spill event.

ESA's spill response plan consists of the following:

- Qualified workers may, but are not required to, clean up simple spills
- Simple spills will be cleaned up by LANL Emergency Management & Response (EM&R) if qualified workers are unable or choose not to
- ESA workers may not clean up complex spills
- Complex spills must be reported by calling 911 or contacting EM&R at 7-6211

Simple and Complex spills are differentiated by the following information:

Simple:	**Complex:**
• Limited* quantity/toxicity, • Limited exposure potential, • Lacks potential to become an emergency, and • Workers on-site are trained in the hazards *and* appropriate PPE.	• High toxicity and/or amount, • High exposure potential, • Has potential to become an emergency, • Workers on-site lack training in the chemical hazards *and* appropriate PPE

Spill reporting is accomplished through SPCC Plan documentation and EM&R notification. Spills in excess of one quart must be documented by the Facility Coordinator using the form in Appendix C and the record retained as part of the SPCC Plan in accordance with Section 3.2. If EM&R is notified of a spill event, they will contact all additional applicable parties including ESH-18. Completion of additional spill reports and the determination of federal spill reporting will then be made by ESH-18 and EM&R in accordance with Laboratory and DOE policies, and federal and state regulatory reporting requirements.

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 operating group and/or Facility Manager, and by ESH-18. As a result of this review and evaluation, the SPCC Plan will be amended 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) if such technology has been field proven at the time of review.

Changes to inspection forms, the contact lists, and the addition of records to the Plan do not require certification by a Professional Engineer. All amendments that address material changes such as a change in the facility's ability to discharge oil will be certified by a Professional Engineer.

Appendix A

Inspection Sample Forms

Los Alamos

WALK-AROUND INSPECTION FORM

ABOVEGROUND TANKS AND ASSOCIATED PIPING

General Site Information

Inspection Date:		Inspector:	
Technical Area:	21	Structure #:	
Tank Contents:	Diesel	Capacity Tank:	2,000 gallons
Adequate lighting:	Yes ❑ No ❑	Is facility fenced?	Yes X No ❑
Housekeeping:	Good ❑ Poor ❑	Current Tank Content:	_____ Gallons

Storage Unit Condition

Describe general condition of tank and support structure, and/or piping (signs of rust, leakage, tank residing in water, cracks in foundation, no labels, etc.):			
Tank Contents Label:	Adequate ❑	Inadequate ❑	
Grounding Wires:	Adequate ❑	Inadequate ❑	N/A ❑
Level Gauge:	Adequate ❑	Inadequate ❑	N/A ❑
Liquid Level Alarm System:	Adequate ❑	Inadequate ❑	N/A ❑
Tank Shell Condition:	Good ❑	Poor ❑	N/A ❑
Foundation & Supports Condition:	Good ❑	Poor ❑	N/A ❑
Flanges, Valves, Nozzles and Piping:	Good ❑	Poor ❑	N/A ❑
Transfer Pump:	Good ❑	Poor ❑	N/A ❑

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 ❑	Unlocked ❑	No valve ❑
Sump? (if yes, describe in comments below):	Yes ❑	No ❑	
Storm Water Accumulation in Containment Unit:	Yes ❑	No ❑	
Oil accumulation in dike or collection sump:	Yes ❑	No ❑	

Comments:

Items Requiring Corrective Actions:

Corrective actions taken (give dates):

Inspector's signature: **Date:**

BPS Quarterly Maintenance
Maintenance Instruction

TTA-MI-BPS-06, R2
March 26, 1998

OSR PROCEDURE

1.0 SUBSYSTEM: Back-up Power System (BPS)

2.0 COMPONENTS: Diesel engine and generator

3.0 MAINTENANCE: Test and inspection (CONTRACTOR)

4.0 PERIODICITY: Quarterly

5.0 ESTIMATED MAN HOURS: 4 (2 contractors - 2 hours each)

6.0 PREREQUISITES:

6.1 Inform the Duty Operator prior to commencing this maintenance.
6.2 Schedule during the weekly planning meeting.

7.0 SAFETY PRECAUTIONS:

7.1 Ensure all permits/documents (Job Ticket, AHA, PHA, RWP, etc.) are completed.
7.2 Watch for rotating equipment. Don't allow clothing to hang loose.
7.3 Watch for hazards when the electrical panels and battery covers are open.
7.4 Ear protection shall be worn in room 5514A when the diesel is operating.

8.0 TOOLS/EQUIPMENT NEEDED: To be supplied by the contractor

9.0 SPARE PARTS: To be supplied by the contractor

10.0 PROCEDURE:

10.1 The contractor will check and adjust as required:
10.1.1 All fluid levels.
10.1.2 Electrical circuits for voltage, current, and frequency.
10.1.3 Transfer switch times.
10.1.4 Pressures and temperatures.
10.2 Attach a copy of the completed maintenance report to this MI.

11.0 RETURN TO SERVICE TEST: None

12.0 COMMENTS:_____

13.0 REVIEWED BY:

Completed by: _____ Date: _____

Fac Oper Team Leader: _____ Date: _____

Quality Management: _____ Date: _____

Appendix B

Secondary Containment Storm Water Discharge Record

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

Oil Spill Tracking Form

Oil Spill Tracking Form

Date	Spill Location	Quantity Spilled	Corrective Action Taken	Plans to Prevent Recurrence

Appendix D

AST Filling Procedures

AST Filling Procedures

Occasional filling of ASTs with oil or fuel will involve the transfer of material from motor carrier. The greatest potential for an oil or fuel spill at most LANL facilities resides with this transfer. Therefore, listed below are the required guidelines for the oil or fuel transfer.

1. No material shall be unloaded from any motor vehicle unless the maxi brakes are securely set, and all other reasonable precautions are taken to prevent motion of the motor vehicle during the unloading process. If parked on a steep incline, wheel chocks will be in place.
2. Prior to unloading the cargo tank, spill prevention and control measures shall be in place. These measures include the following, as a minimum:
   - Vehicle shall have a spill kit adequate to clean up a 5 gallon spill (absorbent "litter" and pig mats)
   - Temporary dikes or storm drain covers shall be installed at storm drains or to block off nearby drainages.
3. During unloading, keep fire away and prevent persons in the vicinity from smoking, lighting matches, or carrying any flame.
4. Ensure that at all times during unloading process, the procedure is attended by at least two qualified persons. One person is responsible for monitoring the cargo tank and one person is responsible for monitoring the delivery hose attachment, where the delivery hose is connected to the storage tank piping.
5. A person "attends" the unloading of the cargo tank if, throughout the process, he/she has an unobstructed view of the cargo tank or delivery hose attachment, and is within 25 feet of the cargo tank or delivery hose attachment.
6. A person is "qualified" if he/she has been made aware of the nature of the material which is to be unloaded, has been instructed on the procedures to be followed in the event of a spill or other emergency, and/or is authorized to move the cargo tank and has received SPCC training.
7. When a cargo tank is unloaded by a suction-piping system through an open filling hole of the cargo tank, electrical continuity shall be maintained from cargo tank to receiving tank.
8. When a cargo tank is unloaded through a vapor-tight (not open hole) top or bottom connection, so that there is no release of vapor at a point where a spark could occur, bonding or grounding, is not required. Contact of the closed connection must be made before flow starts and must not be broken until after the flow is broken until after the flow is completed.
9. Bonding or grounding is not required when a cargo tank is unloaded through a nonvapor-tight connection into a stationary tank provided the metallic filling connection is maintained in contact with the filling hole.
10. Upon completion of the oil transfer, the cargo tank shall not be moved until is has been verified that all valves and other closures in the discharge systems are closed and free of leaks.
11. EM&R shall be notified in the event of a spill, and all leaks and spills that occur during the transfer shall be cleaned up and disposed of properly.

Developed By: Merrick Engineers & Architects and ESH-18, revised 3/28/02.
Reference: 49 CFR Part 177, Subpart B: Loading and Unloading

Appendix E

Certification of the Applicability of the Substantial Harm Criteria

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Facility Name: TA-21 ABOVE-GROUND TANK

Facility Address: MS E528

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 (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? No

   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 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 (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 2?

   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 re-portable oil spill 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.

Jay Conner
Name (please type or print)

ESA-EM Deputy Group Leader
Title

Signature

3/28/12
Date