

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

for

CITY OF ALBANY MUNICIPAL AIRPORT

525 AVIATION WAY, S. E.
ALBANY, OR 97321

- **Original Date of Plan:** September 2002
- **Date of Last Plan Amendment:** October 2012
- **Date of Last Plan Review:** October 2012
- **Designated person accountable for spill prevention:** Chris Bailey
Albany Public Works Operations Manager

AS DESCRIBED IN 40 CFR 113.3(E), A COPY OF THIS PLAN AND ITS ATTACHMENTS MUST BE KEPT AT THE FACILITY (IF NORMALLY ATTENDED AT LEAST FOUR HOURS PER DAY) OR AT THE NEAREST FIELD OFFICE IF NOT SO ATTENDED, AND MADE AVAILABLE UPON REQUEST TO THE REGIONAL ADMINISTRATOR FOR ON-SITE REVIEW

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PART 1 INTRODUCTION

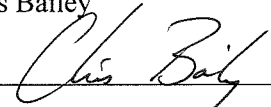
The Albany Municipal Airport Spill Prevention Control and Countermeasure Plan (Plan) contained within this document has been prepared according to the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). This facility does not meet the “substantial harm” criteria as established in the regulations at 40 CFR Part 112.20 Appendix C, Attachment C-I (Attachment 1). The Albany Municipal Airport meets the Tier II qualification criteria set forth under 40 CFR 112.3(g)(2).

The official and complete (including all appendices) copy of the SPCC plan is kept and maintained by the City of Albany, Airport Manager. Additional copies have been distributed to the Albany Fire Department, Albany Police Department, Albany Building Maintenance staff, and the Administration/FBO building for reference.

PART 2 CERTIFICATION OF SPCC PLAN

I hereby certify that I have examined the facility and, being familiar with the requirements of 40 CFR 112, attest that I have visited and examined the Albany Municipal Airport; that the Plan has been prepared in accordance with accepted and sound industry practices and standards, and with the requirements of 40 CFR112; that procedures for required inspections and testing have been established; that the Plan will be fully implemented; and that the Albany Municipal Airport meets the qualification criteria set forth under 40 CFR 112.3(g)(2).

Name: Chris Bailey

Signature: 

Title: City of Albany, Public Works Operations Manager

Date: 10/25/12

PART 3 MANAGEMENT COMMITMENT

In accordance with 40 CFR 112.7, this SPCC plan has the full approval of City of Albany management at a level of authority to commit the necessary resources to fully implement the Plan, including the manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Name: Mark Shepard, P.E.

Signature: Mark Shepard

Title: City of Albany, Public Works Director

Date: 10/31/12

PART 4 SPCC PLAN AMENDMANT

4.1 Amendment of SPCC by Regional Administrator 40 CFR 112.4

In accordance with 40 CFR 112.4, if the City of Albany has discharged more than 1,000 U.S. gallons of oil in a single discharge or discharged more than 42 U.S. Gallons of oil in each of two discharges as described in 40 CFR 112.1(b), the City will submit the following information to the Regional Administrator, EPA Region 10 within 60 of the discharge(s):

U.S. EPA - Region 10
1200 6th Avenue (ECL-116)
Seattle, WA 98101
(206) 553-1200
(800) 424-4EPA

- Name of Facility
- Your Name
- Location of the Facility
- Maximum Storage or handling capacity of the facility
- Corrective Action and countermeasures you have taken
- Adequate description of the facility
- The cause of the discharge(s)
- Additional Preventative Measures taken or contemplated to minimize possibility of recurrence
- Other information as the Regional Administrator may reasonably require pertinent to the SPCC or discharge

The City will amend the SPCC if the Regional Administrator requires. Amendments to the Plan will be logged (Attachment 2).

4.2 Facility Management Review And SPCC Plan Amendment 40 CFR 112.5

As described in 40 CFR 112.5(a), this Plan will be amended in accordance with the general requirements of 40 CFR 112.7 and with any specific requirements when there is a change in the design, construction, operation, or maintenance that materially affects the potential for a discharge.

As described in 40 CFR 112.5(b), a complete review and evaluation of this Plan will occur at least every five years from the date of the last review. The Plan will be amended within six months of the review to include more effective, field-proven, prevention and control technology if it will significantly reduce the likelihood of a discharge; the City will implement the amendment as soon as possible but not later than six months of the Plan amendment. The documentation of the Plan review and Amendment is included as Attachment 2.

PART 5 FACILITY DESCRIPTION

5.1 Facility Identification

Facility Name and Location:

City of Albany Municipal Airport
525 Aviation Way SE
Albany, OR 97321
(541) 917-7629

Facility Owner, Operator, Address, and Telephone:

City of Albany, Oregon
333 Broadalbin Street SW
PO BOX 490
Albany, OR 97321
(541) 917-7629

Individual(s) Responsible for Spill Prevention:

<u>Name</u>	<u>Title</u>	<u>Telephone</u>
Chris Bailey	Albany Public Works Operations Manager	(541) 917-7629
Jon Goldman	Albany Transit Superintendent	(541) 917-7605
Herb Hoffer	Albany Environmental Services Supervisor	(541) 917-7631

5.2 Facility location, layout, and operations

The Albany Municipal Airport occupies about 83 level acres and supports small, general aviation aircraft. The airport was created in 1929 and has been reconfigured several times to support development as well as construction of Interstate 5. The airport is bounded by Interstate 5 on the west, Knox Butte Road on the north, Price Road on the east, and Santiam Highway and private development on the south. Figure 1 is a site location map. The runway is 3,004 feet long and is paralleled on the west side by a taxiway. The only access road to the airport connects to Knox Butte Road. The closest waterbody to the site is Cox Creek which surrounds the site's southeast, south, and southwest portion. Cox Creek flows to the west under Interstate 5. The confluence of Cox Creek and the Willamette River is approximately 7,000 feet downstream of the Albany Municipal Airport.

There are seven City owned facilities on the airport property, including two historic hangars, one FBO building, a 10-unit open aircraft T-hangar, 12,000 gallon aviation gasoline AST, shed housing navigational equipment, and a hangar with office space. There are also eleven private hangars on the north end of the airport and five privately owned T-hangars on the south end of the airport. (See Figure 2.)

This SPCC applies to City owned facilities only (shaded in orange on Figure 2).

Operations at the site include hobbyist general aviation activities, aircraft maintenance, aircraft storage, tie downs, flight instruction, and fueling. The City's Building Maintenance staff has offices onsite, but do not staff the airport. They provide oversight during tank truck unloading operations.

5.3 Site drainage

The storm drainage system at the airport is a combination of ditches and pipes. There are three stormwater outfalls at the airport. Basin 1 drains the central portion of the taxiway, parking apron, and the surrounding areas and empties into Cox Creek at outfall number 1. Fueling operations, fuel aboveground storage tank, and waste oil tanks are located in this basin. Basin 2 collects runoff from the northwest portion of the facility. This includes paved and grassy areas and discharges at outfall number 2 on the northwest property line and into a drainage ditch which flows into Waverly Lake. Basin 3 drains the southern group of hangars and surrounding grassy areas and discharges at outfall number 3 into Cox Creek. Figure 3 shows site drainage.

5.4 Oil Storage Capacity

There is one (1) shop fabricated, double-walled, steel, aboveground storage tank (AST) onsite with a capacity of 12,000 gallons. The AST is used to store aviation gasoline. The City of Albany owns and manages the tank.

There are two 150-gallon waste oil tanks located inside the FBO building in the shop area. As of the date of this SPCC, the two waste oil tanks are empty and not in use. They may be used in the future when the airport has an active FBO.

There is no drum storage or mobile storage onsite.

PART 6 SPILL PREVENTION CONTROLS

6.1 Spill potential, containment and supplies

In July 2000 the Albany Municipal Airport installed the 12,000-gallon, double-walled aviation gasoline AST. The AST is positioned on a 13' × 40' concrete pad. Bollards on four-foot center spacing protect the storage tank, along with the fueling dispenser. The transitional sump located at the north end of the storage tank has a sensor to detect leaks. The sensor is tested on 3 year interval to ensure proper operation. The piping from the transitional sump to the dispenser is 1½" I.D. Environ Geoflex underground piping. The City of Albany uses a EECO System 1500 to monitor interstitial, transitional sump, and level sensors.

The City of Albany employs the following overfill prevention procedures (40 CFR 112.8(c)(8)(v): the AST is currently equipped with a mechanical device designed to stop flow when the tank is at 90-95% full. The City of Albany only orders partial fuel loads, allowing more frequent replenishing (fresher fuel), and less operating inventory which ensures the tank is never close to being full. In addition, transport delivery drivers are not allowed to deliver product past the pre-determined safe fill amount to prevent overfilling a tank and the probable associated spill. We have consulted industry professionals who report that the mechanical devices are robust and reliable; however there is currently no safe way to test the mechanical overfill device. The City believes that our usage practices provide protection from spills. The City has noted this information and may upgrade the device during future maintenance work on the AST.

If a leak were to occur in the AST itself the material would be collected in the interstitial space between the two walls of the tank. The storage tank has a hand pump located on the south end of the tank to

remove product or condensate from the containment area. Per OSWER 9360.8-38 (see attachment 3), EPA considers shop-fabricated double-walled tanks that employ overfill and leak detection measures and are constructed to industry standards as meeting the secondary containment requirements in the SPCC rule.

The paved area adjacent to the fuel pump is bermed. If a leak were to occur as a plane is fueling, the berm would cause the product to flow to a catch basin and be routed to a 1,000-gallon oil water separator that is equipped with a manual 10" gate shutoff valve (as described in 40 CFR 112.8(b)(2)) on the discharge side of the separator for use in containing the spill onsite. The tool to close the shutoff valve is mounted on a pole adjacent to the AST (figure 4). When product is collected in the separator, the City will contract with a licensed hauler to remove it.

In the event of a small spill there are pads and booms located in the labeled spill kit storage bin at the north end of the AST. There is a larger oil absorbent boom stored in the FBO Building. In addition, City of Albany Environmental Services Division stocks spill control equipment, including absorbent mats/pads, absorbent booms/"pigs", oil-dry granular absorbent, empty drums, brushes and dust pans, and gloves at the city's Operations Facility. To ensure proper response to a spill, a sign is posted at the fuel pump listing required actions in the event of a spill.

The linear distance that material must flow from the oil water separator to Cox Creek is 650 feet. Cox Creek flows to Swan Lake, Waverly Lake and then to the Willamette river. The confluence of Cox Creek with the Willamette River is approximately 7,000 feet downstream of the Albany Airport.

The two waste oil tanks are located inside the FBO Building with no connection to the storm water system, surface water, or the outside.

6.2 Tank Truck Unloading

Tank truck unloading occurs at the site. The Albany Municipal Airport receives bulk aviation fuel from Epic Aviation Services. Material is transported to the site by a licensed fuel transporter. Fuel transfer from truck to tank is always supervised by City of Albany Building Maintenance staff. The fuel tank driver must set the parking brake in order to activate fuel unloading. The fuel tank driver also must employ chock blocks. The Albany attendant will verify that the product on the truck is the correct product and grade to use in filling the tank. Prior to and after filling, Albany staff will oversee measuring and verify the level of tank contents. Albany staff also reviews the tank monitor and the amount of fuel is entered into the inventory management system.

The transfer area that supports the valves and connections during transfer would drain to the catch basin and oil/water separator as described above. There is no loading/unloading rack.

If product is released, City of Albany staff will initiate the spill-response procedure and notify the appropriate public agencies.

6.3 Inspection, Testing, and Records

The City of Albany Building Maintenance staff conducts weekly inspections of the AST. Facility Inspection Checklists are completed, signed, and retained at the City of Albany Building Maintenance office at the Albany Airport. (Attachment 4). City of Albany Public Works staff conducts monthly inspections of stormwater outfalls and industrial areas, including the fuel AST and oil/water separator, in accordance with the Airport's Industrial Stormwater Permit issued by the Oregon Dept of Environmental

Quality. Industrial stormwater inspection reports are completed, signed and retained at the Public Works Environmental Services Office (Attachment 5). Epic Aviation staff conduct annual inspections of the City's AST (Attachment 4) during which they also confirm task proficiency with Albany staff present. Epic Aviation inspection is conducted to insure fuel quality and regulatory compliance for Epic Aviation branded customers.

Any problems noted on the inspections, such as issues with seams, gaskets, piping, valves, or visible discharges, will be promptly corrected.

Testing and visual inspection of the AST is conducted per the Steel Tank Institute (STI) SP001 standard (Attachment 6). The City's AST meets the Category 1 definition which requires periodic AST inspection and a Formal External Inspection by a Certified Inspector at a maximum interval of 20 years. External formal inspections will be performed by a certified inspector. The City will maintain a record of formal inspections at the City of Albany Airport Manager's office.

The piping from the transitional sump to the dispenser is 1½" I.D. Environ Geoflex underground piping, installed with the AST year 2000. In accordance with 40 CFR 112.8(d)(4) the City will conduct integrity and leak testing of this pipe at the time of installation, modification, construction, relocation, or replacement.

6.4 Site Security

The City of Albany operates the airport. City Building Maintenance staff offices are located on the Airport property; therefore, they are periodically onsite but they do not directly provide oversight or security at the Airport. At the writing of this SPCC (December 2011) there is no FBO. The perimeter of the airport is fenced and gated. The gates are locked during non-business hours and limited access is provided during business hours. Waste-oil storage is in a secured Administration/FBO building with limited access.

6.5 Personnel Training

All "oil-handling" City staff involved in the operation and maintenance of equipment to prevent discharges, discharge procedure protocols, and general Airport operations will be trained at least once per year by Public Works Environmental Services staff in coordination with the Public Works Operations Manager. Training records will be housed with the Airport Manager.

Epic Aviation staff conducts one-time training to Albany staff who supervises tanker truck unloading as well as task proficiency training during their annual AST inspections. Training records are kept at the Albany Municipal airport in the same binder as the quality control records.

PART 7 SPILL RESPONSE, NOTIFICATION, CLEANUP AND CONTACTS

7.1 Spill Response

The primary emphasis of this SPCC is discharge prevention. Spill response phone numbers are located on a sign on the fuel dispenser. Should a spill occur, the following countermeasures for discharge discovery, response, and cleanup shall be performed, as appropriate:

First, Assess the situation!

A. EMERGENCY

- ***IF IT IS SAFE*** to do so, turn off shut off valve and remove any other ignition sources from area
- Secure and/or evacuate the area to protect all personnel and the public from any immediate danger
- Call 911
- AFD will respond with spill and emergency equipment
- Call Albany Public Works and Airport Manager
- Albany Public Works Environmental Services staff will respond with additional spill response equipment and assess the situation. If appropriate, they and/or AFD will contact an emergency response contractor.
- Albany Public Works Environmental staff or the Albany Airport Manager will notify the appropriate state and federal agencies
- Complete a spill release/report form (Attachment 5)
- Albany Environmental Services staff will determine appropriate disposal methods for spill clean-up material and will manage the disposal process.

B. NON EMERGENCY

- ***IF IT IS SAFE*** to do so, stop source of spill and attempt to contain the spill using DRY clean-up method with equipment from the spill kit (booms, absorbent, pads) and/or close containment valve. ***If not safe, evacuate and follow EMERGENCY procedures above.***
- Contact the Albany Public Works Department and Albany Airport Manager
- Albany Public Works Environmental Services staff will respond with additional spill response equipment and assess the situation. If appropriate, they will contact an emergency response contractor.
- Albany Public Works Environmental staff or the Albany Airport Manager will notify the appropriate state and federal agencies
- Complete a spill release/report form (Attachment 7)
- Albany Environmental Services staff will determine appropriate disposal methods for spill clean-up material and will manage the disposal process.

7.2 Notification and Reporting

National Response Center (Federal) Reporting Requirements (112.7(a)(4) and (a)(5))

The Albany Airport Manager or Albany Environmental Services staff will immediately report **any** spill resulting in the discharge of oil into navigable waters to the National Response Center (NRC). The NRC number is included in the contact list.

The following information will be reported (verbally):

1.	Address and phone number of facility
2.	Date/time of incident.
3.	Type of incident and the type and quantity material(s) discharged.
4.	Estimate of quantity discharged to navigable waters
5.	Source of discharge
6.	Description of affected media
7.	Cause of the discharge
8.	Damages caused by the discharge
9.	Action being taken to stop, remove, mitigate the effects of the discharge
10.	Whether an evacuation may be needed
11.	Names of individuals and/or organizations who have also been contacted

A written report of the above information will be submitted to the EPA Regional Administrator within 60 days from one of the following discharge events:

1. A **single discharge of more than 1,000 U.S. gallons** of oil to navigable waters or adjoining shorelines, or
2. **Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons** of oil occurring within any twelve month period

Submit to:
 U.S. EPA - Region 10
 1200 6th Avenue (ECL-116)
 Seattle, WA 98101
 (206) 553-1200
 (800) 424-4EPA

State of Oregon Reporting Requirements

To meet Oregon spill reporting requirements, the Albany Airport Manager or Albany Environmental Services staff will report the spill to the Oregon Emergency Response System (OERS). The number is included in the contact list.

ORS 466.635 requires any person owning or having control over oil or hazardous material who has knowledge of a spill or release shall immediately notify OEM as soon as that person knows the spill or release is a reportable quantity.

OERS provides 24-hour service through Oregon Emergency Management (OEM), of the Department of State Police. The OEM duty officer will ask you to provide the following information:

1.	Your name and agency.
2.	Your telephone number.
3.	Type of incident and the materials involved.
4.	Location/date/time of incident.
5.	Background/how the incident occurred.
6.	On-scene contact and how to reach them.
7.	Severity of incident - threat to people, property, or the environment.
8.	Actions taken - containment, evacuation.
9.	Responsible party and telephone number.

7.3 Contact List and Phone Numbers

Albany Fire and/or Police Department 911

City of Albany Contacts:

Chris Bailey, Public Works Operations Manager (541) 917-7629

Jon Goldman, Public Works Transit Superintendent (541) 791-7605

Public Works Operations main number (541) 917-7600

Public Works Operations, After Hours (541) 967-6233

Herb Hoffer, Environmental Services Supervisor (541) 917-7631

Mark Shepard, Public Works Director (541) 917-7634

National Response Center (800) 424-8802

Oregon Emergency Response System (OERS) (800) 452-0311

Epic Aviation Services (866) 501-3742

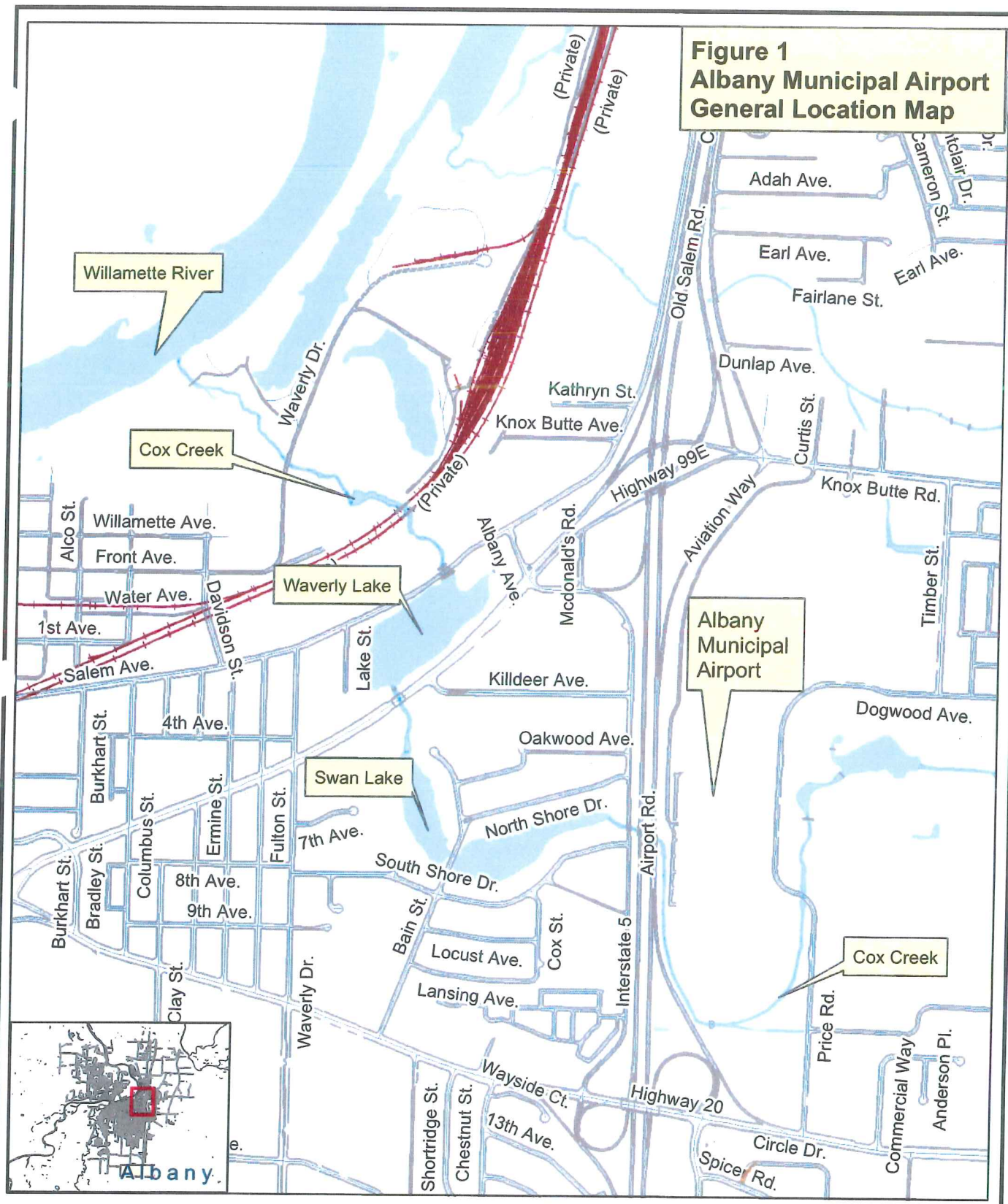
Only Call this number if spill occurs during tanker truck loading/unloading

Emergency Response Contractors *(The following local contractors offer 24 hour spill response)*

NWFF Environmental (Philomath, OR) (800) 942-4614

NorthWest HazMat, Inc. (Springfield, OR) (800) 597-1323

**Figure 1
Albany Municipal Airport
General Location Map**



Albany Municipal Airport General Location Map

The City of Albany's Infrastructure records, drawings, and other documents have been generated over many decades, using differing standards for quality control, documentation, and verification. All the information provided represents current information in a readily available format. While the information provided is generally believed to be accurate, occasionally the information proved to be incorrect, and that the City is not responsible. Prior to making any property purchases or other investments based in full or in part upon the information provided, it is specifically advised that you independently find only the information contained within our records.

0 135 270 540 810 1,080 1,350 1,620
Feet

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City of Albany - 333 Broadalbin St. SW, Albany, Oregon 97321 (541) 917-7676



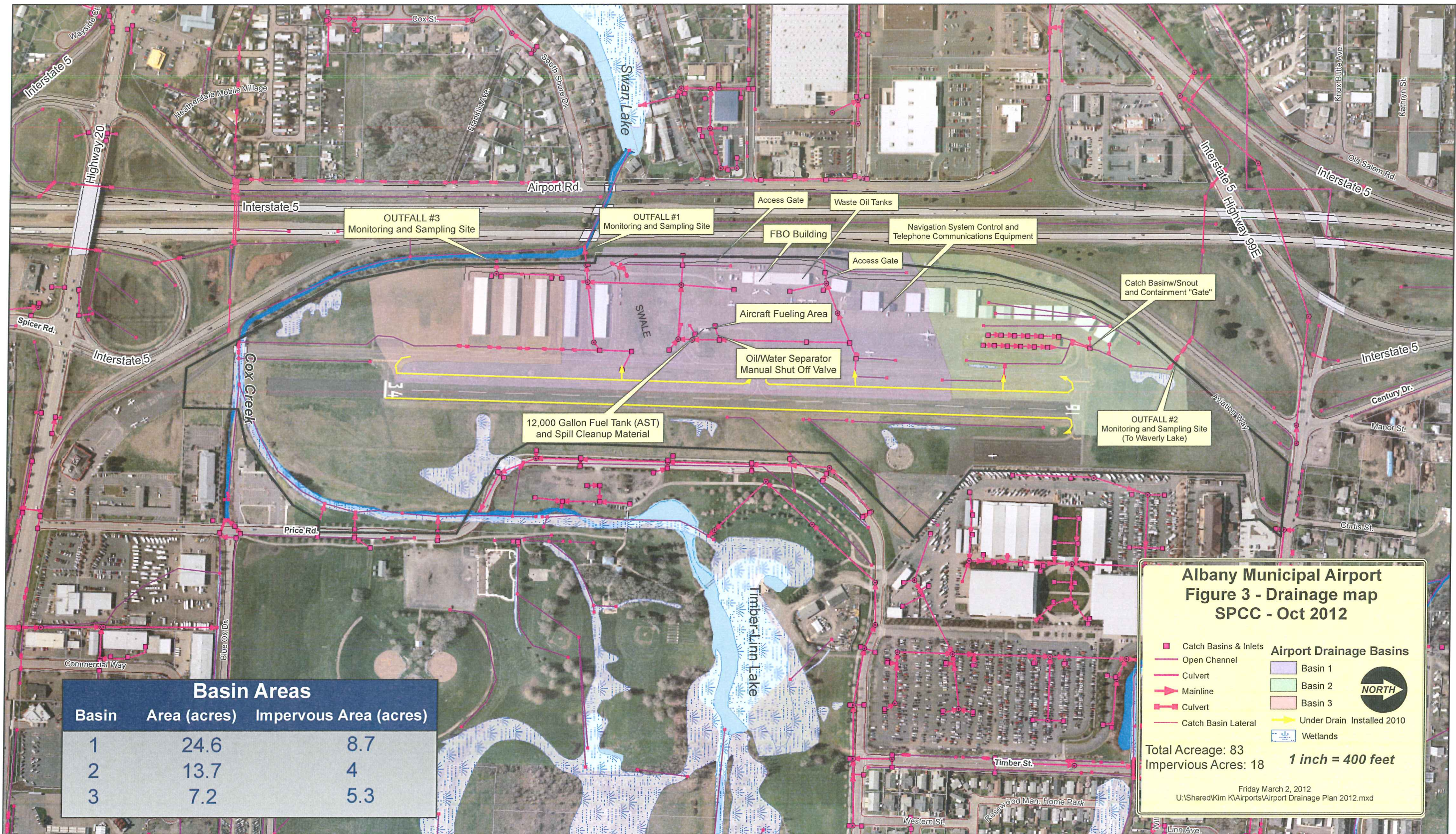
**Albany Municipal Airport
Figure 2 - Facility Diagram
SPCC - Oct 2012**

<ul style="list-style-type: none"> ■ Catch Basins & Inlets — Open Channel — Culvert ➔ Mainline — Culvert — Catch Basin Lateral ■ City Owned Building 	<p>Airport Drainage Basins</p> <ul style="list-style-type: none"> ■ Basin 1 ■ Basin 2 ■ Basin 3 <p>Total Acreage.....78.7 Impervious Acres..18.0</p>
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NOTE: This SPCC applies to City Facilities only

1 inch = 313 feet

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OUTFALL #3
Monitoring and Sampling Site

OUTFALL #1
Monitoring and Sampling Site

Access Gate

Waste Oil Tanks

FBO Building

Navigation System Control and Telephone Communications Equipment

Access Gate

Aircraft Fueling Area

Catch Basin/Snout and Containment "Gate"

Oil/Water Separator Manual Shut Off Valve

OUTFALL #2
Monitoring and Sampling Site (To Waverly Lake)

12,000 Gallon Fuel Tank (AST) and Spill Cleanup Material

Basin Areas		
Basin	Area (acres)	Impervious Area (acres)
1	24.6	8.7
2	13.7	4
3	7.2	5.3

Albany Municipal Airport
Figure 3 - Drainage map
SPCC - Oct 2012

- Catch Basins & Inlets
- Open Channel
- Culvert
- Mainline
- Culvert
- Catch Basin Lateral

Airport Drainage Basins

- Basin 1
- Basin 2
- Basin 3
- Under Drain Installed 2010
- Wetlands

Total Acreage: 83
 Impervious Acres: 18

1 inch = 400 feet

Friday March 2, 2012
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Attachment 1 Certification of the Applicability of the Substantial Harm Criteria (40 CFR Part 112.20 Appendix C, Attachment C-I

Facility Name: Albany Municipal Airport
Facility Address: 525 Aviation Way SE, Albany, OR 97321

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 Attachment C-III to this appendix or a comparable formula¹) 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" (see Appendix E to this part, section 13, for availability) 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 Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?

¹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

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

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 Chris Bailey Name CHRIS BAILEY
Title OPERATIONS MANAGER Date 10/25/12

SPCC PLAN AMENDMENT LOG

Amendment Number:	
Amendment Description:	
Amendment Date:	
Amendment Number:	
Amendment Description:	
Amendment Date:	
Amendment Number:	
Amendment Description:	
Amendment Date:	

OSWER 9360.8-38

MEMORANDUM

SUBJECT: Use of Alternative Secondary Containment Measures at Facilities Regulated under the Oil Pollution Prevention Regulation (40 CFR Part 112)

FROM: Marianne Lamont Horinko
Assistant Administrator

TO: Oil National Policy Managers, Regions 1-10

PURPOSE

This memorandum amends the guidance issued on April 29, 1992 (i.e., Use of Alternative Secondary Containment Measures at Facilities Regulated under the Oil Pollution Regulation (40 CFR Part 112), (OSWER 9360.8-37) concerning the potential use of certain double-wall aboveground storage tanks (ASTs) for secondary containment purposes. A copy is attached for your reference. This guidance also clarifies when shop-built double-walled ASTs satisfy the applicable secondary containment requirements in the Spill Prevention, Control, and Countermeasure (SPCC) rule, found at 40 CFR part 112. We take this step because larger shop-built ASTs that use the protective measures described in the 1992 guidance are generally protective of the environment under certain circumstances.

BACKGROUND

On April 29, 1992, EPA issued guidance on how certain shop-built double-wall ASTs may comply with the secondary containment requirements of §112.7(c). The guidance discussed compliance with §112.7(c) only, and did not discuss compliance with other applicable SPCC provisions. We said at the time that “there should be many situations in which protection of navigable waters substantially equivalent to that provided by the secondary containment systems listed in section 112.7(c) could be provided by alternative AST systems that have capacities generally less than 12,000 gallons and are installed and operated with protective measures other than secondary containment dikes.”

DISCUSSION

SPCC secondary containment requirements. Section 112.7(c) requires that the owner or operator:

“Provide appropriate containment and/or diversionary structures or equipment to

OSWER 9360.8-38

prevent a discharge as described in §112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following preventive systems or its equivalent:

- (1) For onshore facilities:
 - (i) Dikes, berms or retaining walls sufficiently impervious to contain oil;
 - (ii) Curbing;
 - (iii) Culverting, gutters or other drainage systems;
 - (iv) Weirs, booms or other barriers;
 - (v) Spill diversion ponds;
 - (vi) Retention ponds; or
 - (vii) Sorbent materials.
- (2) For offshore facilities:
 - (i) Curbing, drip pans; or
 - (ii) Sumps and collection systems.”

After nearly a decade of evaluation of the construction, performance, and use of certain shop-built double-wall ASTs, we believe that they may serve as an “equivalent” preventive system for purposes of §112.7(c).

In 1992, we recognized that a shop-built double-wall AST with a capacity “generally less than 12,000 gallons” that was installed and operated with protective measures other than a secondary containment dike might meet the secondary containment requirements of §112.7(c). We described those protective measures as “when the inner tank is an Underwriters’ Laboratory-listed steel tank, the outer wall is constructed in accordance with nationally accepted industry standards (e.g., those codified by the American Petroleum Institute, the Steel Tank Institute, and the American Concrete Institute), the tank has overfill prevention measures that include an overfill alarm and an automatic flow restrictor or flow-shutoff, and all product transfers are constantly monitored.”

Today, after nearly a decade of experience in which we have seen the construction, performance, and use of shop-built double-wall ASTs, we note a low

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occurrence of discharges from such tanks, including tanks with a capacity of 12,000 gallons or more. In some cases, such tanks provide secondary containment where none existed before, or superior environmental protection to alternative containment systems previously used. We believe that a 12,000 gallon limitation on the use of certain shop-built double-wall ASTs is therefore no longer necessary, and believe that shop-built double-wall ASTs that use the protective measures described in 1992 generally satisfy the secondary containment requirements found in §112.7(c).

Bulk storage secondary containment requirements (§112.8(c)(2)); inspection requirements (§112.8(c)(6)). For the same reasons outlined above, we also believe that shop-fabricated double-wall AST, regardless of size, may generally satisfy not only the secondary containment requirements of §112.7(c), but also the bulk storage secondary containment requirements found at §112.8(c)(2). Section 112.8(c)(6) requires the owner or operator to conduct integrity testing on a regular schedule and whenever he makes repairs. The owner or operator must also frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. To comply with the requirement to frequently inspect the outside of the tank, an owner or operator must inspect the inner wall and interstitial spaces of a shop-built double-wall AST. We recommend the use of automatic detection devices to detect discharges into the interstitial space. Owners or operators should conduct this integrity testing and inspection in accordance with industry standards, when practicable. One industry standard presently available is "SP001-00, Standard for Inspection of In-Service Shop-Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids." Other applicable standards may be developed in the future.

Other applicable SPCC requirements. While shop-fabricated double-wall ASTs may satisfy the requirements of §112.7(c) and §112.8(c)(2), such tanks must also continue to satisfy all other applicable SPCC requirements. For example, the facility owner or operator must satisfy §112.7(h) requirements for tank car and tank truck loading/unloading racks if he transfers oil in bulk to those tanks from highway vehicles or railroad cars. If such transfers occur, where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle spills, a quick drainage system must be used. The containment system must be designed to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

Additionally, any piping, equipment, or device not contained within a double-wall AST is subject to the requirements of §112.8(b)(3) and (4), if such piping, equipment, or device is in an undiked area.

CONCLUSION/IMPLEMENTATION Should you have any questions concerning this memorandum, please contact Hugo Fleischman, of my staff, at 703-603-8769.

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Attachment

cc: Michael B. Cook
Elaine Davies
Andrew Gordon
David Drelich
Oil Removal Managers
OERR Records Manager, IMC 5202G
OERR Documents Coordinator, HOSC 5202G
Jeff Josephson, Superfund Lead Region Coordinator, USEPA Region 2
NARPM Co-Chairs
Doug Kodama, Oil Lead Region Coordinator, USEPA Region 2



1200-Z Permit STORMWATER INSPECTION

Monthly Visual Inspection – Albany Municipal Airport

Analyst: _____

Date: _____

Airport #1 [A1] (South of Airport, near I-5)*

Flow _____ Time _____

Foam Yes No

Visual Oil Sheen Yes No

Floating Solids Yes No
(associated with industrial activities)

Color/Odor Yes No
(sulfur, musty, harsh, chlorine?)

Condition of and around outfall: _____
(excessive or inhibited plant growth, structural damage?)

Comments _____

Aviation Gas AST and fueling area:

General Housekeeping: _____
(Trash, tracking, leaks, spills, potential for pollutants to enter the storm system?)

Spill Kit: _____
(Stocked? Y/N)

Stormwater Control Measures:

Oil/Water Separator: _____
(More than 1/3 full of oil/sediment? Y/N)

“Snout”: _____
(Operational? Y/N)

Catch Basins: _____
(evidence of pollutants entering? Y/N)

Note: Building maintenance staff inspects the Aviation Gas AST monthly (see file for form)

Airport #2 [A2] (West of Airport Access Road)*

Flow _____ Time _____

Foam Yes No

Visual Oil Sheen Yes No

Floating Solids Yes No
(associated with industrial activities)

Color/Odor Yes No
(sulfur, musty, harsh, chlorine?)

Condition of and around outfall: _____
(excessive or inhibited plant growth, structural damage?)

Comments _____

Airport #3 [A3] (South Hangers Outfall)*

Flow _____ Time _____

Foam Yes No

Visual Oil Sheen Yes No

Floating Solids Yes No
(associated with industrial activities)

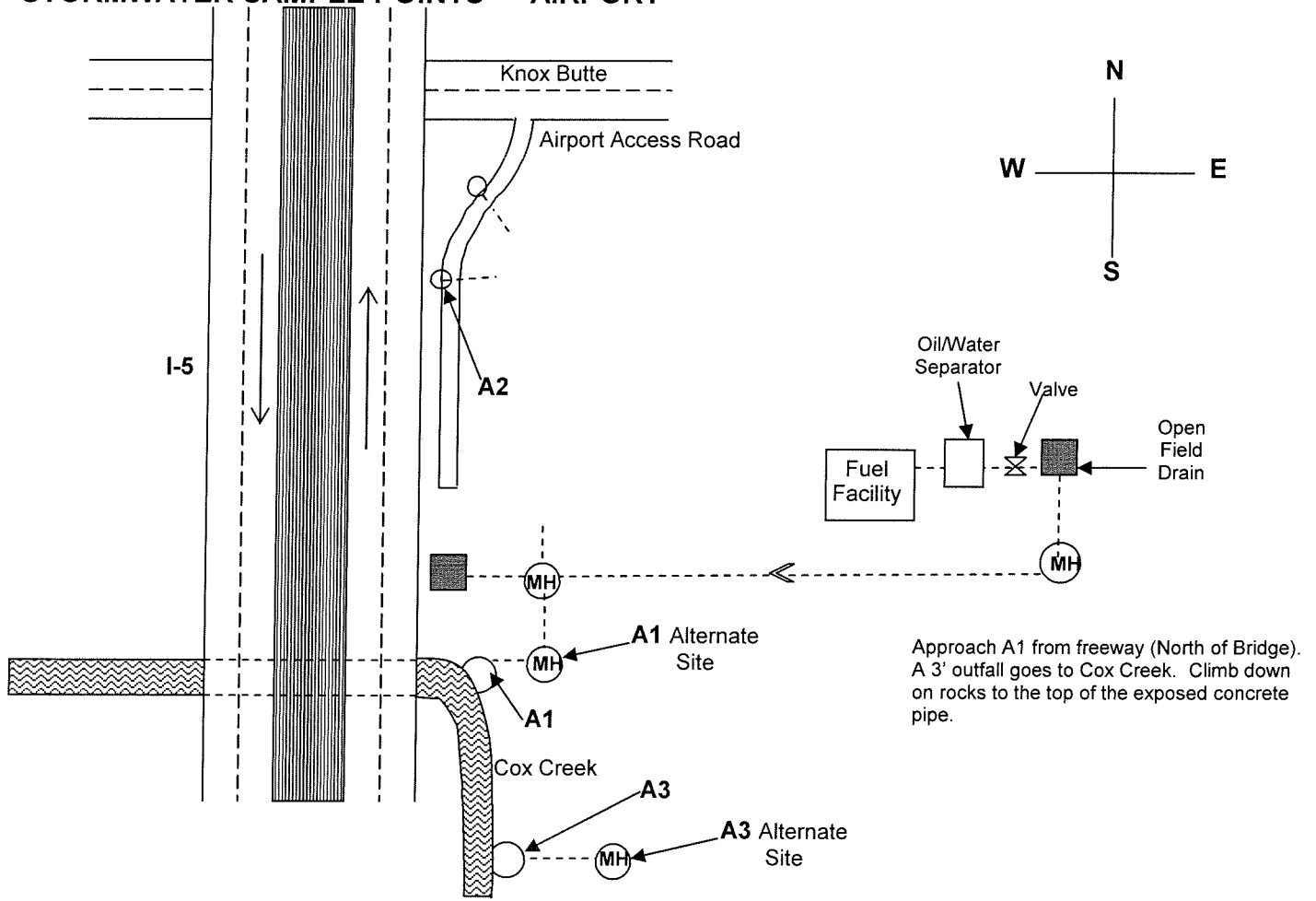
Color/Odor Yes No
(sulfur, musty, harsh, chlorine?)

Condition of and around outfall: _____
(excessive or inhibited plant growth, structural damage?)

Comments _____

*See map on back of this form for locations.

STORMWATER SAMPLE POINTS — AIRPORT



Steel Tank Institute (STI) SPOO1

Standard for the Inspection of Aboveground Storage Tanks

In Table 5.5 Use The Following Designations:

P – Periodic AST inspection

E – Formal External Inspection by Certified Inspector

I – Formal Internal Inspection by Certified Inspector

L – Leak test by owner or owner’s designee

() indicates maximum inspection interval in years. For example, E (5) indicates formal external inspection every 5 years.

TABLE 5.5 TABLE OF INSPECTION SCHEDULES

Shop Fabricated AST Size (US Gallons)		Category 1	Category 2	Category 3
Shop Fabricated ASTs	0 – 1100 (0-4164 liters)	P	P	P, E&L(10)
	1101 - 5,000 (4168-18,927 liters)	P	P, E&L(10)	[P, E&L(5), I(10)] or [P, L(2), E(5)]
	5001 – 30,000 (18,931 – 113,562 liters)	[P, E (20)]	[P, E (10, I(20)) or [P, E (5), L(10)]	[P, E&L(5), I(10)] or [P, L(2), E(5)]
	30,001 – 50,000	[P, E (20)]	P, E&L(5), I(15)	P, E&L(5), I(15)
Portable Containers		P	P	P**

** Owners shall either discontinue use of portable container for storage or have the portable container DOT (Department of Transportation) tested and recertified per following schedule (refer to Section 9.0): Plastic containers – every 7 years; steel portable container – every 12 years; Stainless Steel container – every 17 years.

SPILL/RELEASE REPORT

Facility Location: Albany Municipal Airport, 525 Aviation Way SE, Albany, OR 97321

Individual Filling Out this Report

Name:	Title:
Date:	Time:
Telephone:	

Spill/Release Information

Date/Time Spill Started:	
Date/Time Spill Stopped:	
Type of Material Spilled:	Total Quantity spilled (gal):
Source of Spill:	Location at facility:
Cause of Spill:	
Weather conditions: (raining, windy, etc.)	
The spill affected: <input type="checkbox"/> Surface Water <input type="checkbox"/> Soil <input type="checkbox"/> Sediment <input type="checkbox"/> Gravel <input type="checkbox"/> Concrete/Asphalt	
Has the spill reached surface water? <input type="checkbox"/> Yes <input type="checkbox"/> No (The closest surface water body is: Cox Creek)	
Estimate of volume (gal) reaching surface water _____ gallons	

Spill Reporting (Indicate if and when the following parties were identified of the spill)

Agency	Date/Time notified	Notified by	Agency Contact	Responded to site? Y/N
City of Albany Operations (541-917-7600)				
Fire/Medical/Police 911				
OERS (800-452-0311)				
NRC (800-424-8802)				
Epic Aviation (866-501-3742) <i>(only if occurs during tank fill)</i>				
HazMat Contractor Name:				
Other:				

OERS Number assigned (if applicable): _____

Spill Response

Name of City of Albany Environmental Services staff directing Clean-up:

Describe corrective actions taken to control and contain the spill (include dates and times):

Potential Risk to Fish or Wildlife: ___ No ___ Yes: Describe: _____

Risk to Public Safety: ___ No ___ Yes: Describe: _____

Was evacuation necessary? ___ No ___ Yes

Samples Taken: ___ No ___ Yes: Describe: _____
(Attach Map and COC)

Was a cleanup contractor Used? ___ No ___ Yes

If yes:

Company Name: _____

Address: _____

Telephone: _____

Individual Directing Operations: _____

Date/Time of Arrival on scene: _____

Incident De-brief:

What steps have been (or will be) taken to prevent this type of spill from happening again?

