SPCC Plan

Oil Spill Prevention, Control, and Countermeasure Plan for:

EcoLube Puyallup

Physical Address:
213 10th Street SE
Puyallup, WA 98372-3404

Mailing Address:
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Prepared by:

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environmental & natural resource consultants

Project No. 1217-20010-02

Prepared by:

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Revised:
October 2021

Introduction, Compliance, Management Approval and Certification

At the request of EcoLube Recovery, LLC (ELR), EVREN Northwest, Inc. (ENW) has prepared this spill protection, control, and countermeasures plan (the SPCC Plan or Plan) for their used oil transfer facility located at 213 10th Street SE, Puyallup, Washington. The Plan is required because the facility has an aggregate capacity of greater than 1,320 gallons of oil which has the reasonable potential for release to navigable waters.

The purpose of this SPCC Plan is to describe measures implemented by ELR to prevent oil discharges from occurring, and to prepare ELR to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. This Plan has been prepared to meet the requirements of Title 40, Code of Federal Regulations Part 112 (40 CFR part 112) and supersedes any previous Plan developed to meet provisions previously in effect.

In addition to fulfilling requirements of 40 CFR, the SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees and contractors, as a guide to facility inspections, and as a resource during emergency response.

Management Purpose and Commitment. *ELR is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review, updating, and amendment of this SPCC Plan. ELR will provide the coordination and resources required to implement all measures specified in the Plan, including expeditiously control and remove any quantity of oil discharged that may be harmful to the environment or safety of employees and the public.*

Approved by Owner Representative:

Eric C. Spencer: E. C. Spencer Date: 10-29-21

Professional Engineer Certification (40 CFR 112.3(d))

I hereby certify and attest that I have visited and examined the facility, or have supervised examination of the facility by appropriately qualified personnel and, being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices including consideration of applicable industry standards, and the requirements of 40 CFR Part 112. I further certify and attest that procedures for required inspections and testing have been established and this SPCC Plan is adequate for the facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112.

Name: Daniel A Scarpine

Date: 11/1/2021

Registration No.: 43011

SPCC Plan Location, Review and Revision

Location. In accordance with 40 CFR 112.3(e), a complete copy of this SPCC is maintained and available at the facility's office. The SPCC Plan shall be available to the US Environmental Protection Agency (EPA) Regional Administrator for on-site review during normal working hours.

Review and Revision of SPCC Plan. In accordance with 40 CFR 112.5(a), ELR periodically reviews and evaluates the SPCC Plan for any changes to the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning or decommissioning of containers
- Replacement, reconstruction, or movement of containers
- Reconstruction, replacement, or installation of piping systems
- Construction or demolition that might alter secondary containment structures
- Changes of product or service
- Revision of standard operation or maintenance procedures at the facility

Amendments to the SPCC Plan made to address changes of this nature are referred to as technical amendments, and therefore, the amended SPCC Plan must be recertified by a Professional Engineer. Non-technical amendments (i.e., administrative changes) can be done and must be documented by the facility owner and/or operator. Examples of non-technical amendments include, but are not limited to:

- A change in personnel responsible for implementation of the Plan.
- A change in personnel listed on the emergency contact list of the Plan.

ELR will make required amendments to the SPCC Plan within six (6) months of the change to the facility, and implement the changes as soon as possible, but no later than six (6) months following the date of the amended Plan.

In accordance with 40 CFR 112.5(b), ELR reviews and evaluates the Plan at least once every five (5) years. Revisions to the SPCC Plan, if required, are made within six (6) months of the five (5) year review. In accordance with 40 CFR 112.5(c), a Professional Engineer will certify any technical amendment made to the SPCC Plan. Documentation of reviews and any amendments shall be made in the following table. Unless a technical or administrative change prompts an earlier review, the next scheduled review of this Plan must occur by January 2026.

Use the following table to document SPCC review and/or revisions.

Date	Reason for review or revision	Conducted by	Findings or/and Modifications to SPCC
January 2021	ELR relocated to new a new facility in Puyallup	EVREN Northwest, Inc.	Updated the SPCC in its entirety to be applicable to new facility
October 2021	Changed status of previously unused storage tank #3 to active	EVREN Northwest, Inc.	Updated SPCC to account for the additional storage of Tank #3, since its status changed from unused to used.

Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

No additional measures must be implemented to bring the facility within compliance of with the provisions of Title 40, CFR part 112 (SPCC rules) at this time. Although not required by Title 40, CFR part 112, the following is recommended as a standard operation procedure:

- Bulk storage containers at this facility shall be properly labeled for their contents.

Certification of Substantial Harm Determination

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 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) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? 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) 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.

Owner Representative:

Eric C. Spencer: _____ Date: 10-29-21

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* Only relevant rule provisions are indicated. For a complete list of SPCC requirements, refer to the full text of 40 CFR Part 112.

Acronyms and Abbreviations

API	American Petroleum Institute
CFR	Code of Federal Regulations
CRD	continuous release detection
DOT	Department of Transportation
Ecology	Washington State Department of Ecology
ELR	EcoLube Recovery, LLC
ENW	EVREN Northwest, Inc.
EPA	US Environmental Protection Agency
Plan	SPCC Plan
SDS	Material Safety Data Sheet
NRC	National Response Center
OWS	oil water separator
RP	Recommended Practice
SPCC	Spill Prevention, Control and Countermeasure

1.0 GENERAL FACILITY INFORMATION

Please reference Figure 1 (Site Vicinity Map) and Figure 2 (Site Plan).

1.1 Company Information

Name of Facility:	**EcoLube Recovery, LLC**
Type of Facility:	Used oil transfer and processing facility
Date of Initial Operation:	March 2021
Location:	213 10th Street SE Puyallup, Washington 98372-3404
Name and Address of Operator:	ClearLube Re-Refining 40 Lake Bellevue Drive, Suite 140 Bellevue, Washington 98005
Facility On-site Contacts:	**Nate Spencer,** Branch Manager Mobile (24 hrs.): (253) 343-4397 **Ricci Keller,** Regional EHS Manager Mobile (24 hrs.): (503) 339-6968

1.2 Facility Description and Operations Overview

ELR leases an approximately 1.4-acre property which is operated as a used oil transfer and processing facility. The facility was previously used to store and transfer products for the food industry and was modified in 2020 for the current operations.

Exterior areas provide space for trucks to drive around the centrally located building. A conventional loading dock is present on the east side of the building. On the south side of the building is a covered truck loading/unloading area designed with spill protection and containment. On the west (exterior) and south (interior) sides of the building are tanks contained in engineered secondary containment.

Primary operations at ELR's Puyallup facility are:

- *Collection/transfer of used oil.*
- *Collection/transfer of used oil filters and oily debris.*
- *Storage and distribution of new antifreeze and collection/transfer of used antifreeze.*
- *Storage and distribution of window wash fluid.*

The location of the facility is illustrated on the Site Vicinity Map on Figure 1 and Figure 2 presents an aerial Site Plan. Primary industrial activities are conducted within the building/exterior tank storage perimeter. Trucks and vehicles may be parked in exterior areas.

During the week, the facility generally has personnel present between 5 AM (when the route truck drivers arrive) and 7 PM. Additionally, the drivers transporting material to the Portland, Oregon facility arrive at 5 AM. The facility is closed on weekends and holidays.

1.3 Facility Operations

1.3.1 Used Oil Transfer and Storage

The primary facility activity is the collection of used oil, storage onsite, and then transfer of stored used oil to ELR's Portland, Oregon, facility for recycling. This is accomplished by:

- Route trucks collect used oil from client facilities.
- Collected used oil is transferred into Tank 1, 2, 3 or 4 located within engineered secondary containment on the west (exterior) side of the building.
- Tanker trucks and trailers are used to transfer accumulated used oil to ELR's Portland facility.

All loading/unloading of used oil is conducted under cover in the Contained Truck Loading/Unloading Area.

1.3.2 Used Oil Filter and Oily Debris Storage

A 53-foot fully enclosed trailer is used to store 55-gallon drums containing either:

- Used oil filters. ELR requires their customers to drain the oil filters according to Washington State Department of Ecology requirements prior to pick up. Therefore, the content of the 55-gallon drums is classified as metals recycling and is not included in the oil storage inventory.
- Used oily absorbent and debris. This waste does not have free liquid. Therefore, the content of these 55-gallon drums is classified as a solid waste.

Drums are stored in the trailer located on the loading dock on the east side of the building, prior to transport to the ELR Portland facility.

1.3.3 New and Used Antifreeze Transfer and Storage

New and used antifreeze is stored in tanks in the interior portion of the engineered secondary containment. Two of the tanks (Tank 8 and Tank 9) contain concentrated new antifreeze (extended life antifreeze and conventional antifreeze, respectfully). And two of the tanks (Tank 12 and Tank 13) contain new antifreeze blended with deionized water. A truck is used to deliver new blended antifreeze products to clients and pickup used antifreeze. Tank 7 stores used antifreeze collected from clients which is subsequently transferred to ELR's Portland facility for recycling. See Figure 2 for antifreeze tank locations, contents, and sizes.

Antifreeze is not classified as an oil product under 40 CFR part 112.

1.3.4 Other Oil Container Storage

ELR has a few small (55-gallon drums) bulk oil storage containers as listed in Table 1-1, below.

1.4 Bulk Oil Storage Information (40 CFR 112.7(3)(i))

This section describes the bulk containers used to store oil at the facility. All containers are identified with unique identifiers listed in Table 1-1, below, and illustrated on the Site Plan on Figure 2. Please note that the number of containers (and especially the volume in the containers)

on site may vary, the maximum inventory reasonably likely to be present at any one time is listed in Table 1-1.

Table 1-1. Summary of Bulk Oil Storage Containers

Location	Oil Product	Container	Amount	Tank Material	Storage Capacity (gallons)
Exterior Tank Farm					
Tank 1 & 2	Used Motor Oil	25,454-gal vertical tank	2	Steel	50,908
Tank 3	Used Motor Oil	29,610-gal vertical tank	1	Steel	28,800
Tank 4	Used Motor Oil	28,788-gal vertical tank	1	Steel	28,788
Inside Building					
Drum 1	Used Oil	55-gal drum	1	Steel	55
Drum 2	New Motor Oil	55-gal drum	1	Steel	55
Drum 3	Used Absorbent	55-gal drum	1	Steel	55
		Total Storage Capacity			**108,661**
Note:					
1. Most containers listed are used for collection; typically volume oil onsite will be significatly less than total storage capacity.					

1.5 Evaluation of Discharge Potential

The ELR facility stores and handles used oils and a small amount of new motor oil. The use of both engineered (stationary) and active secondary containment measures mitigate potential discharge.

1.5.1 Site Drainage

The facility has an engineered subsurface storm water system, which:

- Directs all captured water to the City of Puyallup storm sewer in 10th Street SE on the west side of the property (Discharge Point 1 on Figure 2).
- Collects storm/surface water from:
    - Building roofs.
    - Hardscaped (asphalt and concrete) parking and drive areas (see Figure 2 for catch basin locations).
    - The conventional loading dock on the east side of the building (using a transfer pump). An emergency shut-off switch for the transfer pump proximate to the loading dock and manhole PS-2 (see Figure 2) allows for spill containment of a release in this area.

  - Drain lines originating from the south-adjacent railroad property.

- *Does not* receive water from the engineered secondary containment, including the exterior tank farm. (This is directed to the sanitary sewer with permission from the City of Puyallup.)

Storm water collected from the northern and eastern (loading dock) portion of the property is directed to a pre-existing oil water separator for treatment prior to discharge. A shutoff valve is present in-line after the oil water separator in case of a release that needs containment.

The eastern portion of the property is currently graveled and infiltrates during most storm events. No storage of trucks or materials takes place in this area of the property.

1.5.2 Distance to Navigable Waters, Adjoining Shorelines, and Flow Paths

The nearest major (navigable) body of water is the Puyallup River, approximately 820 feet to the north of the site. Any uncontained releases at the facility that migrate offsite would route to the City of Puyallup's storm sewer system in 10th Street SE on the west side of the facility. From here, the city storm sewer drains north, then west, then north again to an outfall to the Puyallup River located under the 9th Street SE bridge over the river.

1.6 Discharge History

There have been no discharges of more than 1,000 gallons of oil into or upon *navigable waters* or adjoining shorelines in a single spill event; or discharges of oil in a quantity greater than 42 gallons in each of two spill events within any 12-month period during ELR's operational history of the site.

2.0 SPILL RESPONSE AND REPORTING

In the event of a spill, immediately go to Appendix A.

2.1 Discharge Discovery and Reporting

Appendix A provides clear and detailed spill response procedures, including reporting requirements. All discharges should be immediately reported to the Branch Manager, as soon as it is safe to do so. **The rest of this section provides further clarification and support information to Appendix A.**

2.1.1 Verbal Notification Requirements

For any discharge that reaches navigable waters, or threatens to reach navigable waters, immediate notification must be made to:

- The Washington Emergency Management Division (1-800-258-5990),
- The National Response Center (NRC) (1-800-424-8802), and
- The Washington State Department of Ecology (Ecology) Northwest Regional Office (425-649-7000).

If appropriate, the NRC will notify other federal agencies. However, in most cases, notification of other federal agencies will not be required provided that immediate action to contain and clean up the release has already been undertaken.

Additional verbal notification requirements are described in Appendix A.

2.1.2 Written Notification Requirements

A written notification will be made to the US Environmental Protection Agency (EPA) for any single discharge of oil to navigable waters or adjoining shoreline waterway of more than 1,000 gallons, or for two discharges of more than 42 gallons of oil to a waterway in any 12-month period. This written notification must be made within 60 days of the qualifying discharge, and a copy provided to Ecology.

2.2 Cleanup Contractor

ELR should be able to contain and cleanup all identified potential releases at the facility. In the unlikely event that additional support is required, the Branch Manager will contact the specialized spill response and cleanup contractor listed in Appendix A. This contractor has the necessary equipment to respond to a discharge of oil reaching Blair Waterway or adjoining shorelines, including floating booms and oil skimmers.

2.3 Spill Response Kits and Materials

Spill cleanup kits are maintained in areas proximate to oil containers as illustrated on Figure 2. Spill kit materials include absorbent material, booms, an empty 55-gallon drum for waste disposal, non-sparking shovels, and brooms. These kits are inspected monthly and replenished as needed.

2.4 Waste Containment and Disposal

Spill cleanup materials for oil are to be placed in steel drums and sealed with a steel lid and ring. Corrosive materials should be placed in plastic drums ONLY with plastic lids. All containers are to be clearly and completely labeled with respect to the contents and the date the material was generated. Additionally, all recovered materials should be stored in a bermed area and/or under cover to prevent contact with storm water and potential discharge to the storm drainage system.

ELR Recovery Management will ensure proper container usage, storage, and be responsible for arranging for proper disposal.

2.5 Record Keeping

A Spill Report Form (Appendix B) will be completed, retained onsite and made available to regulatory agencies or local municipality upon request.

3.0 SPILL PREVENTION – GENERAL SPCC PROVISIONS

3.1 Conformance with Applicable Requirements (40 CFR 112.7(a)(1) and 40 CFR 112.7(a)(2))

Once all items listed in the section titled *Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational* have been completed, the ELR facility will be in compliance with all applicable requirements of 40 CFR 112.7, as described in the rest of this section.

3.2 Facility Layout (40 CFR 112.7(a)(3))

A description of the physical layout of the facility is provided in Section 1. The Site Vicinity Map included as Figure 1 shows the general location of the facility on a US Geological Survey topographic map. Figure 2 provides an aerial map and shows details on:

- Property outline
- Site layout and facility areas of operation
- Building and hardscape (asphalt and concrete) area outlines
- The location, volume and content of all bulk oil storage containers, *a requirement of 40 CFR 112.7(a)(3)*
- The location, layout and extent of engineered secondary containment
- The direction of surface storm water flow
- The storm water and sanitary sewer systems

Discussions of information required by 40 CFR 112.7(a)(3)(i) through (vi) are presented elsewhere in this Plan.

3.3 Spill Reporting (40 CFR 112.7(a)(4))

The Spill Report Form included in Appendix B will be completed as soon as safely possible after a release to collect the information needed for discharge notification reporting.

3.4 Readily Usable Spill Response Procedures (40 CFR 112.7(a)(5))

Appendix A provides spill response procedures readily usable during an emergency.

3.5 Potential Discharge Volume and Direction of Flow and Containment (40 CFR 112.7(b)

Table 3-1 presents maximum anticipated volume and discharge rate and expected general direction of flow in the event of equipment failure and means of secondary containment for the areas of the facility where oil is stored, used, or handled.

Table 3-1. Potential Spill Events

Potential Event	Maximum Volume Released (gallons)	Maximum Discharge Rate (gal/min)	Spill Direction	Containment and Spill Control Features
Used Oil Bulk Storage (Exterior Tank Farm)				
Tank 1	24,454	Gradual to Instantaneous	Radial	**Engineered Passive Secondary Containment** Tanks are located within stationary engineered secondary containment (concrete floor and berm walls). Containment is sized to accommodate release from the largest tank (Tank 4) and freeboard. *While an unlikely event due to standard operating protocol, any overfilling of tanks would also be contained within the exterior tank farm.*
Tank 2	24,454	Gradual to Instantaneous		
Tank 3	28,800	Gradual to Instantaneous		
Tank 4	28,788	Gradual to Instantaneous		
Transfer Operations (Covered Truck Loading Station)				
Route truck leak or failure[a,b]	4,000	Gradual to Instantaneous	Radial	**Passive and Active Secondary Containment** The covered truck loading station is designed with a concrete floor and a 4-inch or greater berm around the area. All transfer operations are manned. Any spills at this location would be contained initially by the bermed area, followed by immediate active response.
Tank truck and trailer[c]	10,600	Gradual to Instantaneous		
Hose failure during transfer[d]	240	120 gal/min		
Transfer Operations (Pipe Runs and Pumps)				
Pipe or pump failure during transfer[b]	240	120 gal/min	Radial	**Engineered Passive Secondary Containment** Pump and pipe runs are located within stationary engineered secondary containment (concrete floor and berm walls).
Inside Building				
Oil container leak or failure (drum, tank or tote)	55	Gradual to Instantaneous	Full Containment - Not Applicable	**Stationary Secondary Containment** All oil containers are stored on top of spill containment pallets sized to contain the largest container

Notes:
a. Volume listed is largest compartment on truck.
b. Route trucks collect used oil and are brought to the warehouse for the purpose of transferring their contents to a tanker truck. In the unlikely event of a route truck leak or failure, personnel are present to immediately implement active secondary containment.
c. Each tanker truck & trailer has 3 compartments (4,200 / 4,200 / 2,200); max fill = 10,600 gallons
d. Transfer operations are manned allowing for prompt personnel response to an overfill or equipment leak/failure.

3.6 Containment and Diversionary Structures (40 CFR 112.7(c))

Table 3-1, above, summarizes containment and/or diversionary structures/equipment to prevent a discharge as described in 40 CFR 112.7(b). This section provides additional details regarding the containment and diversionary structures.

3.6.1 Engineered Secondary Containment

Used oil collected by the route trucks is transferred into one of three vertical cylindrical steel tanks (Tanks 1, 2, 3 and 4) located in the exterior portion of the engineered secondary containment. The engineered secondary containment has a concrete floor, is surrounded by a concrete berm and has been designed to hold the contents of the largest tank (28,800 gallons) plus freeboard. Secondary containment engineering calculations are presented in Appendix C.

Each of the bulk oil storage tanks (Tank 1, 2, 3 and 4) have a dedicated transfer pump also located within the engineered secondary containment. Pipe runs from the Contained Truck Loading/Unloading Area to the transfer pumps to the tanks is also located within the perimeter of the engineered secondary containment.

3.6.2 Contained Truck Loading/Unloading Area

A long, narrow, covered and contained truck loading/unloading station has been designed along the south side of building. Both the entrance (east end) and exit (south end) have a drivable concrete roll-over berm. The south and north side have engineered concrete berms. The contained area has a minimum height of four inches and blind sumps located at both ends. Pumps can be used in this area to pump spilled materials back into available storage tanks, if required.

Transfer operations are done according to in-house protocol (further discussed in Section 3.11) and are manned. Should a release occur *active secondary containment* can be immediately implemented. The surface of the loading/unload area, the presence of blind sumps and a minimum four-inch containment height, as well as readily available spill kits with absorbent materials (including booms) are all suitable for temporary containment of a release from transfer operations.

3.6.3 Spill Pallet

The 55-gallon drums stored inside the building are stored on a spill pallet designed to provide secondary spill containment. Any release that occurs during movement of these drums would be contained by *active secondary containment.*

3.6.4 Spill Kits

Spill cleanup kits that include absorbent material, booms, and other portable barriers are located at various locations throughout the facility as shown on Figure 2. The spill kits are located within close proximity of the bulk oil product storage and transfer areas for rapid deployment should a spill occur. The response equipment inventory for the facility is listed in Appendix D of this Plan. The inventory is checked monthly to ensure that used material is replenished.

3.7 Practicability of Secondary Containment (40 CFR 112.7(d))

ELR management has determined that secondary containment is practicable at the facility. Currently, all bulk oil storage tanks are located within or on top of engineered secondary containment structures. In addition, the maximum volume of an oil discharge during transfer operations in the Truck Loading/Unloading Area would be contained both through stationary (bermed, contained area) and *active secondary containment*.

3.8 Inspections, Tests, and Records (40 CFR 112.7(e))

ELR performs inspections, tests, and evaluations that is comprised of informal daily examinations, monthly scheduled inspections, and periodic condition inspections. Additional inspections and/or

examinations are performed whenever an operation alert, malfunction, shell or deck leak, or potential bottom leak is reported following a scheduled examination. Inspections are performed by personnel trained on this SPCC Plan. Table 3-2 summarizes the various types of inspections and tests performed at the facility.

Written examination/inspection procedures and monthly examination/inspection reports are signed by the field inspector and are maintained at the branch office for a period of at least three years.

Table 3-2. Overall Inspection and Testing Program

Facility Component	Action	Frequency / Circumstances
Aboveground Containers	Test container integrity. Combine visual inspection with another testing technique (non-destructive shell testing). Inspect outside of container for signs of deterioration and discharges.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Container Supports and Foundations	Inspect container's supports and foundations.	Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made.
Liquid Level Sensing Devices (Overfill)	Test for proper operation.	Monthly
All Aboveground Valves, Piping, and Appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.	Monthly

The program established in this SPCC Plan for regular inspection of all oil storage tanks and related production and transfer equipment follows the American Petroleum Institute's *Recommended Practice for Setting Maintenance, Inspection, Operation, and Repair of Tanks in Production Service* (API RP 12R1, Fifth Edition, August 1997).

3.8.1 Daily Inspections

An ELR employee performs a complete walk-through of the facility regularly. Regular visual inspection involves looking for tank/piping damage or leakage, stained or discolored asphalt or concrete surfaces, or any accumulation of water/fluids in the secondary containment or spill containment pallets.

3.8.2 Monthly Inspections

The checklist provided in Appendix E is used during monthly inspections. These inspections are performed in accordance with written procedures such as API standards (e.g., API RP 12R1), engineering specifications, and maintenance schedule developed by the equipment manufacturers.

The monthly inspections cover the following key elements:

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

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Branch Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is to be removed immediately upon discovery.

Written monthly inspection records are signed by the Branch Manager and maintained with this SPCC Plan for a period of three years.

3.8.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in August of each year using the checklist provided in Appendix E of this Plan. Written annual inspection records are signed by the Branch Manager and maintained with this SPCC Plan for a period of three (3) years.

3.8.4 Periodic Risk-Based Inspeciton

Periodic inspection of onsite petroleum storage tanks will be conducted based on the guidance presented by STI[1]. The interval for these periodic inspections is based on tank size, presence of spill control, and the present continuous release detection (CRD).

Based on this, the facility will conduct Former External and Internal Inspections by a Certified Inspector for each petroleum storage tank, on the frequency shown in the table below.

Table 3-3. Periodic Risk-Based Inspections

Tank No.	Volume (gallons)	Spill Control?	CRD?	Inspection Frequency (E)	(I)
1	25,454	YES	NO	5	20
2	25,454	YES	NO	5	20
3	28,800	YES	NO	5	20
4	25,454	YES	NO	5	20

(E) = External Inspection (Certified Inspector)
(I) = Internal Inspection (Certified Inspector)

[1] STI. May 2017. STI SP001 5th Edition

3.8.5 Cargo Truck Testing and Inspection

All cargo trucks (including the used oil tanker trucks and trailers and route trucks) used at the facility must be in compliance with 49 CFR 180.407 - *Requirements for test and inspection of specification cargo tanks*. A copy of test records/compliance status of all cargo trucks entering the warehouse should be maintained with this SPCC Plan for a period of three (3) years.

3.9 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))

The Branch Manager is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

ELR management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Branch Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix F and maintained with this SPCC Plan for a period of three (3) years.

3.10 Security (40 CFR 112.7(g))

The facility's general 'out of the way' location at the end of a road, surrounded by other facilities and with the railroad property to the south provides the first level of site security. Next a security fence is in place around the entire perimeter of the property. When personnel are not present onsite, this gate is closed and locked.

Only site employees versed in oil handling are allowed within the operational areas with access to oil products; non-employees must sign-in and follow visitor protocol. The facility is lighted whenever personnel are present and is secured (locked) from vandalism at all other times.

3.11 Tank Truck Loading/Unloading (40 CFR 112.7(h))

The potential for discharges during tank truck loading and unloading operations has been addressed by the design of this facility. ELR management is committed to ensuring the safe transfer of used oil and other products. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

3.11.1 Secondary Containment (40 CFR 112.7(h)(1))

Tank truck loading/unloading occurs under cover in the Contained Truck Loading/Unloading Area. Used oil is transferred from route trucks to one of three used oil bulk storage tanks (Tanks 1, 2, 3

and 4). Later the used oil is transferred back out to tanker trucks and trailers for transport to the recycling facility. Tank-dedicated piping runs and a tank-dedicated stationary oil transfer pump are used to transfer the oil both directions.

Any release during transfer activities, which are manned, would be addressed by:

- Contained Truck Loading/Unloading Area: this covered area has been engineered to contain spills with drive-over curbs at the east entrance and west exit, a four-inch concrete curb along the southern extent and a six-inch or greater curb along the northern extent. This area also has two blind sumps (one at each end) to collect/pump spills if needed. Because transfer activities are manned, in the case of a release in the Contained Truck Loading/Unloading Area immediate deployment of *active secondary containment* as described in Section 3.6.4 would ensue. All trucks carry spill response materials, additionally, a readily accessible spill kit is stored in this area (see Figure 2).
- Engineered Secondary Containment. The transfer piping, pumps and bulk oil tanks are all located within the Engineered Secondary Containment. A release during transfer activities from any of this equipment would be contained by the concrete floor and berm of the containment structure.

3.11.2 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

ELR ensures that all drivers/operators meet the minimum requirements and regulations for tank truck loading/unloading established by the US Department of Transportation (DOT) and have been trained in proper discharge prevention procedures. All drivers/operators have a working knowledge and understanding of the site layout, the protocol for entering the facility, and loading/unloading operations. Spill kits and necessary equipment to respond to a discharge from the vehicle or fuel delivery hose are available on-site and in the delivery vehicles.

All loading and unloading of tank vehicles take place only in the designated loading/unloading area. Transfer operations are performed according to the minimum procedures provided in Appendix G, which include:

- A method for ensuring vehicles do not depart before complete disconnection of transfer lines.
- Close inspection for discharges at the lower most drain and all outlets on vehicles both prior to and after filling. If necessary, drains/outlets are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

3.12 Brittle Fracture Evaluation (40 CFR 112.7(i))

The ELR facility has aboveground containers being used for bulk oil storage, specifically Tanks 1, 2, 3 and 4; however, it is not currently known if these tanks are field-constructed or shop-fabricated. Since the maximum storage capacity of any one of these tanks is less than 50,000

gallons, it is a assumed that they are likely shop-fabricated.[2] Field-constructed tanks will be evaluated for the risk of discharge or failure due to brittle fracture or other catastrophe any time:

- A tank undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or
- A tank has discharge oil or failed due to brittle fracture failure or other catastrophe.

Based on information provided by the tank inspection service provider[3], the shell thickness of Tanks 1 through 4 is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for these tanks. Nonetheless, in the event that Tanks 1 through 4 undergo a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be evaluated for risk of discharge or failure, following API-653 or an equivalent approach, and corrective action will be taken as necessary.

3.13 Conformance with Applicable State and Local Requirements (40 CFR 112.7(j))

The SPCC regulation at 40 CFR part 112 is more stringent than requirements from the state of Washington for this type of facility. This SPCC Plan was written to conform with 40 CFR part 112 requirements. The facility thereby conforms with general requirements for oil pollution facilities in Washington. All discharge notifications are made in compliance with local, state, and federal requirements.

All bulk storage tanks at this facility are compliant with the requirements of all state and local authorities, including the local fire code.

3.14 Qualified Oil-Filled Operational Equipment (40 CFR 112.7(k))

The ELR facility does not have any qualified oil-filled operational equipment.

[2] EPA. December 16, 2013. SCPP Guidance for Reginal Inspectors. Section 7.2.2.
[3] Mistras Group.

4.0 DISCHARGE PREVENTION – SPCC PROVISIONS FOR ONSHORE FACILITIES

4.1 Facility Drainage (40 CFR 112.8(b))

The design of containment areas and overall site drainage meet the requirements of 40 CFR 112.8(b). All oil storage and transfer operations occur under cover, with the except of the exterior portion of the engineered secondary containment. Precipitation/contact water in this area is inspected and then manually pumped, with permission, to the City of Puyallup sanitary sewer. Pumped water is treated through an aboveground oil water separator (OWS) prior to discharge to the sanitary sewer.

4.2 Bulk Storage Containers (40 CFR 112.8(c))

The oil-filled bulk storage containers (summarized in Table 1-1) at the ELR facility meet the requirements of 40 CFR 112.8(c).

4.2.1 Construction (40 CFR 112.8(c)(1)

The design and construction of all bulk oil storage containers are compatible with the characteristics of the oil product they contain, including temperature and pressure conditions.

4.2.2 Secondary Containment (40 CFR 112.8(c))

All bulk oil storage containers have a secondary means of containment for the entire capacity of the largest single container plus sufficient freeboard.

4.2.3 Drainage of Containment Structures (40 CFR 112.8(c)(3))

Any fluids in the engineered secondary containment are designed and permitted to be directed to the sanitary sewer, and as such do not discharge to the storm sewer, open watercourse, lake or pond.

4.2.4 Cathodic Protection (40 CFR 112.8(c)(4 & 5))

ELR does not use buried or bunkered metallic tanks for oil storage.

4.2.5 Inspections and Tests (40 CFR 112.8(c)(6))

The inspection and testing program for ELR's bulk containers is described in Section 3.8 and meets the requirements of 40 CFR 112.8(c)(6).

4.2.6 Heating Coils (40 CFR 112.8(c)(7)

ELR does not use heating coils with their bulk oil storage containers at the facility.

4.2.7 Overfill Prevention Systems (40 CFR 112.8(c)(8)

All containers have at least one of the overfill prevention system devices listed in 40 CFR 112.8(c)(8). Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

4.2.8 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

An underground OWS is used to treat a portion of the storm water leaving the site. The OWS is inspected and maintained as part of the facility's *Storm Water Pollution Prevention Plan* (as regulated by the Washington State Department of Ecology).

4.2.9 Visible Discharges (40 CFR 112.8(c)(10))

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are quickly corrected upon discovery. Oil is promptly removed and disposed of according to the waste disposal method described in Section 2.4.

4.2.10 Mobile and Portable Containers (40 CFR 112.8(c)(11))

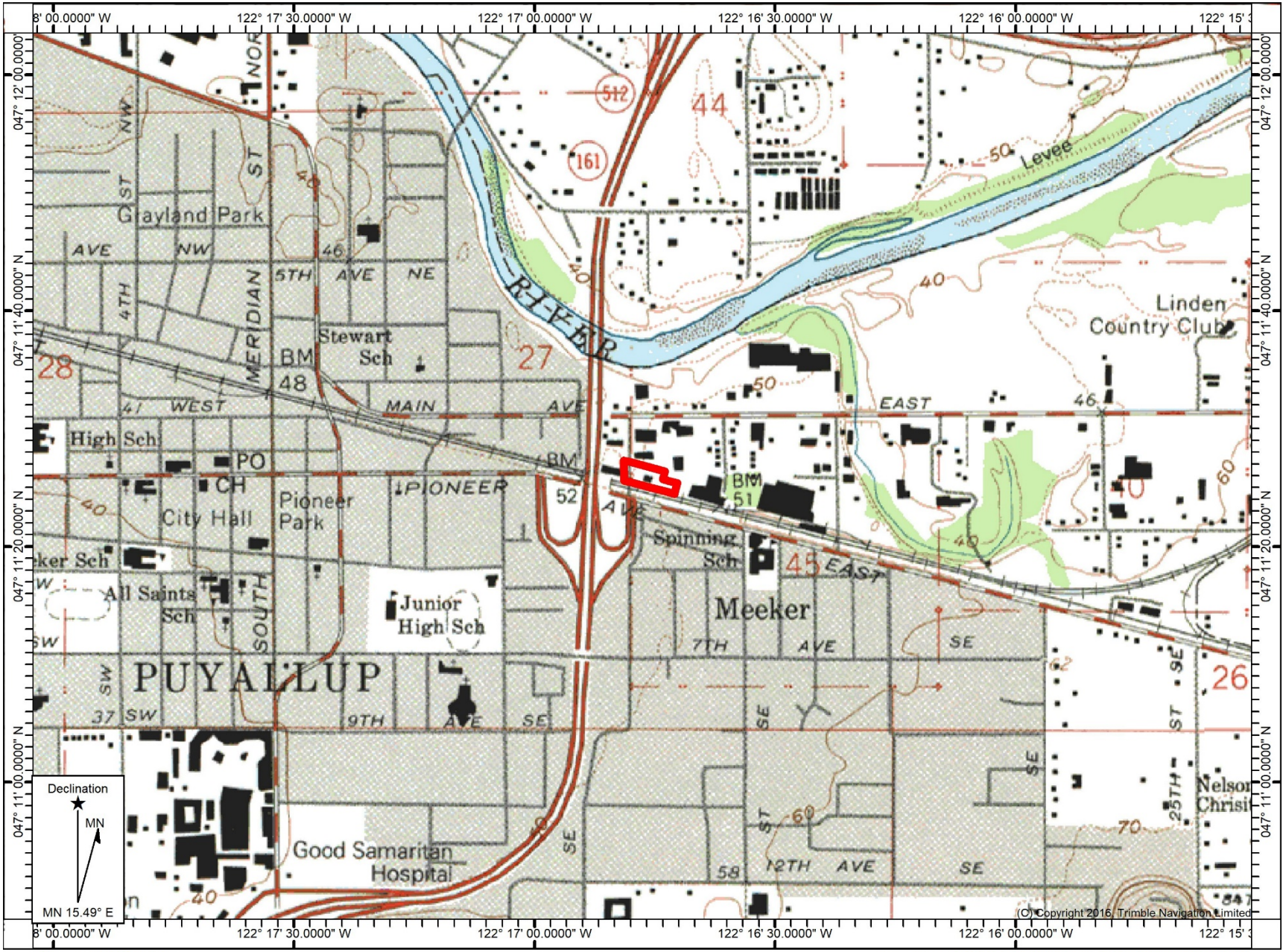
All mobile and portable oil storage containers have stationary secondary containment. Route trucks bringing used oil to the facility have their product transferred as soon as feasibly possible. In the unlikely occurrence of a route truck release, the maximum volume of potential release (4,000 gallons) would be contained by active secondary containment.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

The ELR facility meet the requirements of 40 CFR 112.8(d):

- There is no buried piping in use at the facility.
- Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin.
- All pipe supports (if present) have been designed to minimize abrasion and corrosion and allow for expansion and contraction.
- All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this SPCC Plan.
- Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Most of the aboveground piping is located within areas that are not accessible to vehicular traffic (e.g., inside containment areas). Brightly painted bollards shall be placed where needed to prevent vehicular collisions with equipment.

FIGURES



Name: PUYALLUP
Date: Jan 1, 1994

0 1000 2000
Feet

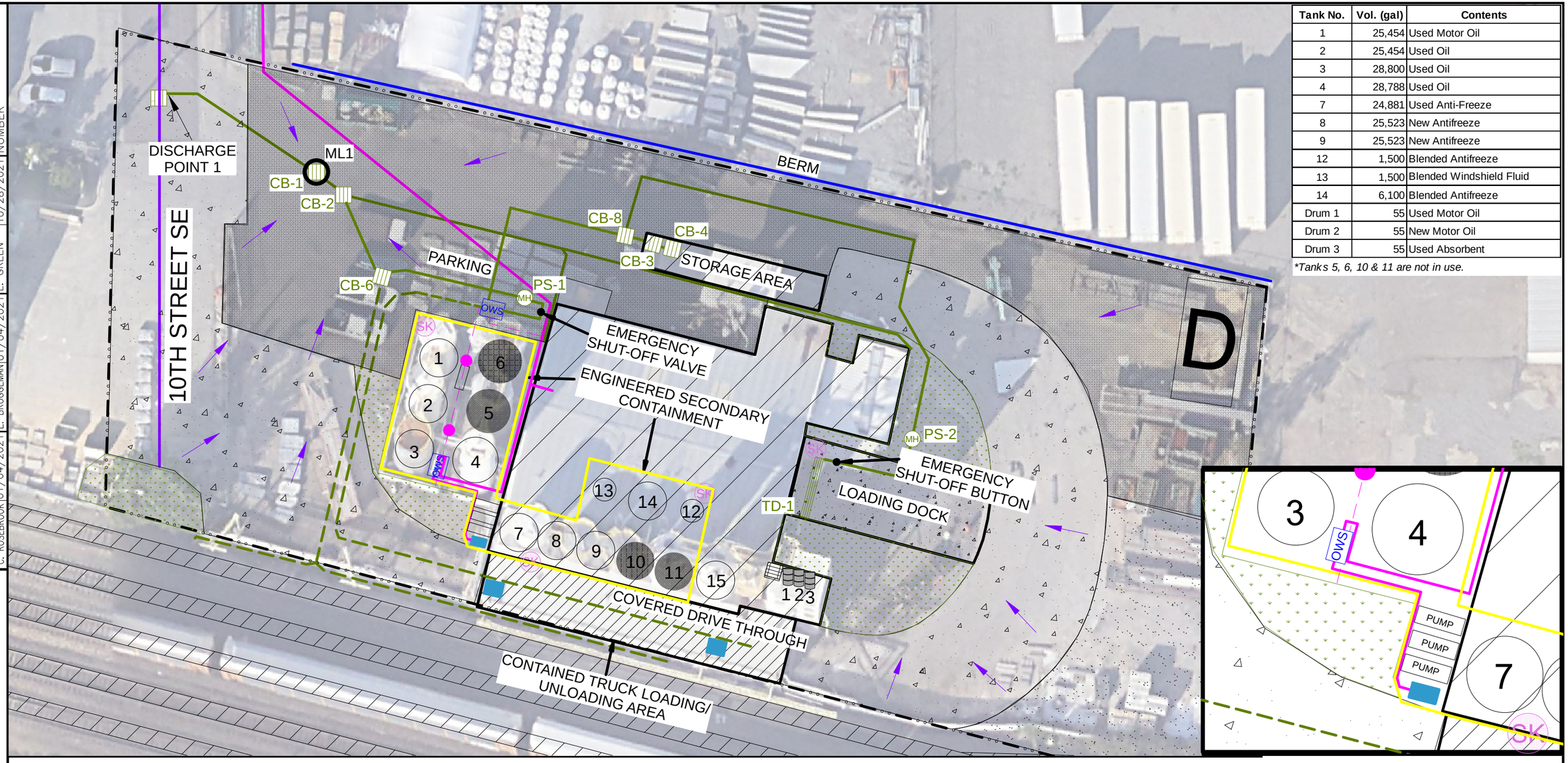
Location: 047° 11' 25.9880" N, 122° 16' 46.5869" W
Contour Interval: 20 ft

EVREN NORTHWEST	Date Drawn: 10/19/2020 CAD File Name: 1217-20001-02_fig1sv_map Drawn By: CLR Approved By: LDG	EcoLube Recovery, LLC 213 10th Street SE Puyallup, Washington	**Site Vicinity Map**	Project No. 1217-20001 Figure No. **1**

DRAWING NUMBER	APPROVED BY	CHECKED BY	DRAWN BY
1217-20001(v01)	10/28/2021	01/04/2021	01/04/2021
	L. GREEN	E. BRUGGEMAN	C. ROSEBROOK

Tank No.	Vol. (gal)	Contents
1	25,454	Used Motor Oil
2	25,454	Used Oil
3	28,800	Used Oil
4	28,788	Used Oil
7	24,881	Used Anti-Freeze
8	25,523	New Antifreeze
9	25,523	New Antifreeze
12	1,500	Blended Antifreeze
13	1,500	Blended Windshield Fluid
14	6,100	Blended Antifreeze
Drum 1	55	Used Motor Oil
Drum 2	55	New Motor Oil
Drum 3	55	Used Absorbent

**Tanks 5, 6, 10 & 11 are not in use.*



LEGEND:

- SUBJECT PROPERTY BOUNDARIES
- SUBJECT BUILDINGS
- LANDSCAPED AREAS
- OIL WATER SEPARATOR (OWS)
- RAILROAD TRACKS
- SOLID WASTE RECEPTACLE (D)
- 55 GALLON DRUM USED OIL
- SPILL KIT (SK)
- CONCRETE
- ASPHALT
- GRAVEL
- MANHOLE (MH)
- CATCH BASIN
- TANKS NOT IN USE
- MONITORING LOCATION (ML1)
- MUNICIPAL STORM SEWER
- SANITARY SEWER PIPE
- SANITARY SEWER PIPE NOT IN USE
- STORM SYSTEM
- 275– GALLON TOTE DIESEL EXHAUST FLUID
- PLUGGED DRAINS
- BLIND SUMP
- TRENCH DRAIN
- DRAIN PIPE

NOTES:

1. BASE MAP DEVELOPED FROM AN AERIAL PHOTOGRAPH MAP DATED 2019 AND ENW FIELD NOTES.
2. ALL BUILDING, STREET, AND FEATURE LOCATIONS ARE APPROXIMATE.
3. SYMBOLS REPRESENT LOCATION AND DO NOT ALWAYS REPRESENT EXACT. SHAPE, SIZE, OR ORIENTATION

APPROXIMATE SCALE

0 30 60 FEET

N

EVREN NORTHWEST INC.
environmental natural resource consultants
PO BOX 14488, PORTLAND, OREGON 97293
P: (503)452-5561, E: ENW@EVREN-NW.COM

FIGURE 2

SITE PLAN

ECOLUBE RECOVERY, LLC
213 10TH STREET SE
PUYALLUP, WASHINGTON

APPENDIX A

Oil Spill Response Procedures

SPILL RESPONSE PROCEDURES

Initial Response

Employee Spill Response:

1.) If a spill is discovered, alert area employees to minimize exposure.

2.) Contact the senior on-site person, and lead or direct them to the spill area.

3.) Help in identifying the spill material, and the source of the release.

4.) Follow their instructions to proceed with the safe, proper response.

Spill Evaluation and Response

Senior On-Site:

1.) Survey spill area to ensure employee safety.
2.) Care for injured personnel.
3.) Isolate the area.
4.) Identify spill material. Once identified, obtain SDS.
5.) If unable to determine the spill material, avoid skin contact or inhalation of vapors.
6.) Determine potential for fire, explosion, or other immediate hazards created by the spill.
7.) Identify the source and attempt to stop the release if this can be done safely.
8.) Have spill response personnel use recommended PPE, and listed precautions from the SDS.
9.) Direct personnel in spill containment procedures using available equipment.
10.) DO NOT USE WATER OR CLEANING AGENTS TO WASH AWAY SPILL MATERIAL
11.) Contact Primary Emergency Response Coordinator listed on the Emergency Contact List. If the primary is unavailable, call the alternate coordinators in sequence.
12.) *Only proceed with agency reporting if instructed to by the Emergency Coordinator.*

Provide the Emergency Coordinator with the following information:

- □ Your name
- □ A contact phone number
- □ Location and type of emergency
- □ Is evacuation needed?
- □ Spill material
- □ Source of spill
- □ Description of all affected media
- □ Approximate Volume
- □ Approximate volume discharged as described in CFR 112.1(b) – *(Discharged to navigable waters of the US or adjoining shoreline)*
- □ Has release been stopped
- □ Has release been contained
- □ Injured employee status
- □ Necessary assistance

Emergency Coordinator:

1.) Provide Senior On-Site with guidance if needed.
2.) Determine if Environmental Contractor should be used.
3.) Proceed to site if there are any injuries or Environmental Contractor is used.
4.) Ensure required agency reporting is accomplished within the specified time periods.
5.) Document all names of individuals and/or organizations that have been contacted.

Emergency Contact List

Primary Emergency Response Coordinator	**Nate Spencer** *Branch Manager*	**Cell: 253) 343-4397** Puyallup, WA
1ST Alternate Emergency Response Coordinator	**Ricci Keller** *Regional EHS Manager*	**Cell: (503) 339-6968** Office: (503) 893-1932 Portland, OR
Health & Safety	Local Rescue Unit	For Emergency **Dial 911**
Fire Department Sta 1	Central Pierce Fire & Rescue 73	(253) 538-6400 or **Dial 911**
Hospital	MultiCare Good Samaritan Hospital	(253) 697-4000 or **Dial 911**
Hazardous Materials	National Response Center	1-800-424-8802
Response/Cleanup Contractors *(for large, uncontainable, and/or offsite spills only)*	US Ecology, Inc.	24-hr: (800) 899-4672 Office: (206) 607-3000
Environmental Agencies	**Washington Emergency Management Division**	**(800) 258-5990**
	Washington State Department of Ecology Southwest Regional Office	(360) 407-6300
	EPA Oregon Operations Office	(503) 326-3250
	EPA Region 10 Storm Water	(206) 553-8399
	EPA Spill Prevention Countermeasure and Control	1-800-424-4372

Spill Containment

For **small** quantity releases:

1. Apply absorbent material until all of the liquid has been absorbed.

For **large** quantity releases:

1. Use spill response materials to minimize spreading and contain the flow.
2. If the spill is unmanageable then the assistance of a spill response contractor may be necessary.
3. If, after actions are taken to contain and clean up the spill, the release still either poses a potential hazard to the health and safety of humans, property, and the environment, or exceeds the reportable quantity, then the appropriate regulatory and emergency response agencies should be contacted.

For a **MAJOR DISCHARGE ON LAND** (defined as a discharge that cannot be safely controlled or cleaned up by facility personnel):

1. All workers must immediately evacuate the discharge site.
2. If the Manager is not present at the facility, the senior on-site person notifies the Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. The Manager (or senior on-site person) must call for medical assistance if workers are injured.
3. The Manager (or senior on-site person) must:
    - □ Notify the Fire Department and/or Police Department in the case of a fire.
    - □ Notify the Washington Emergency Management Division (800-258-5990) and the US Coast Guard if a spill enters navigable waters.
    - □ Call the spill response and cleanup contractors listed in the Emergency Contacts list.
    - □ Immediately contact the Washington State Department of Ecology (425-649-7000) and the National Response Center (800-424-8802) if a spill greater than 42 gallons occurs or any amount enters water.
    - □ Record calls on the Spill Report Form in Appendix B.
    - □ Coordinate cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

For **DISCHARGES TO WATER:**

It is of HIGHEST IMPORTANCE to prevent any oil, regardless of the amount from entering any waterway. Spills that enter a waterway are much more complex and costly to address. Any means possible will be used to prevent oil from entering a waterway including constructing dikes or dams from quicksorb, pillows, soil, etc., or the deployment of floating booms.

Cleanup and Storage of Spilled Materials and Debris

Used absorbent materials applied to spills on pavement may be cleaned up with shovels and stiff brooms. For large quantity releases, recovered absorbent materials should be stored in leak-proof sealable containers such as 55-gallon drums or Hazmat bags. If the spill reaches any of the subsurface portions of the storm water drainage system, then the services of a spill response contractor may be required to properly clean the subsurface storm sewer pipes.

Containers used for storing recovered materials should be clearly labeled with respect to the contents and the date the material was generated. Additionally, all recovered materials should be stored in a bermed area and/or under cover to prevent contact with storm water and potential discharge to the storm drainage system. Materials generated during the response and cleanup of a spill may be transported to an appropriate facility for recycling, treatment, or disposal. Oil and water contaminated with oil may be removed by a spill response contractor or by a used oil recycler.

Reporting Requirements

For any of the following situations:

- For petroleum spills in excess of 25 gallons
- For petroleum spills in any quantity that cannot be cleaned up within 24 hours
- If the release reaches surface water and affects water quality standards, or causes a film or sheen upon, or discoloration of the water or adjoining shorelines, then the discharge is considered a "harmful quantity," and is reportable.
- For chemical/product spills in excess of reportable quantities (as stated on SDS)
- For any release/spill that may endanger health or the environment

IMMEDIATELY: Report the spill to:

- Washington Emergency Management Division at **800-258-5990**
- National Response Center (NRC) at **800-424-8802**

State that a potential emergency exists and provide the following information:

- Date, time and location of the spill
- Type, volume and concentration of waste discharged
- What corrective action has been taken; and
- Your contact information

Other Agency Reporting:

State: Depending on the circumstance, the Washington State Department of Ecology regional office may require notification.

Federal: If appropriate, the NRC will notify other federal agencies. However, in most cases, notification of other federal agencies will not be required provided that immediate action to contain and clean up the release has already been undertaken.

Record Keeping

A Spill Report Form (Appendix B) will be completed, retained onsite and made available to regulatory agency, agent or local municipality upon request.

APPENDIX B

Spill Report Form

Copy and use the following form to document response to significant leaks and spills.

SPILL REPORT FORM

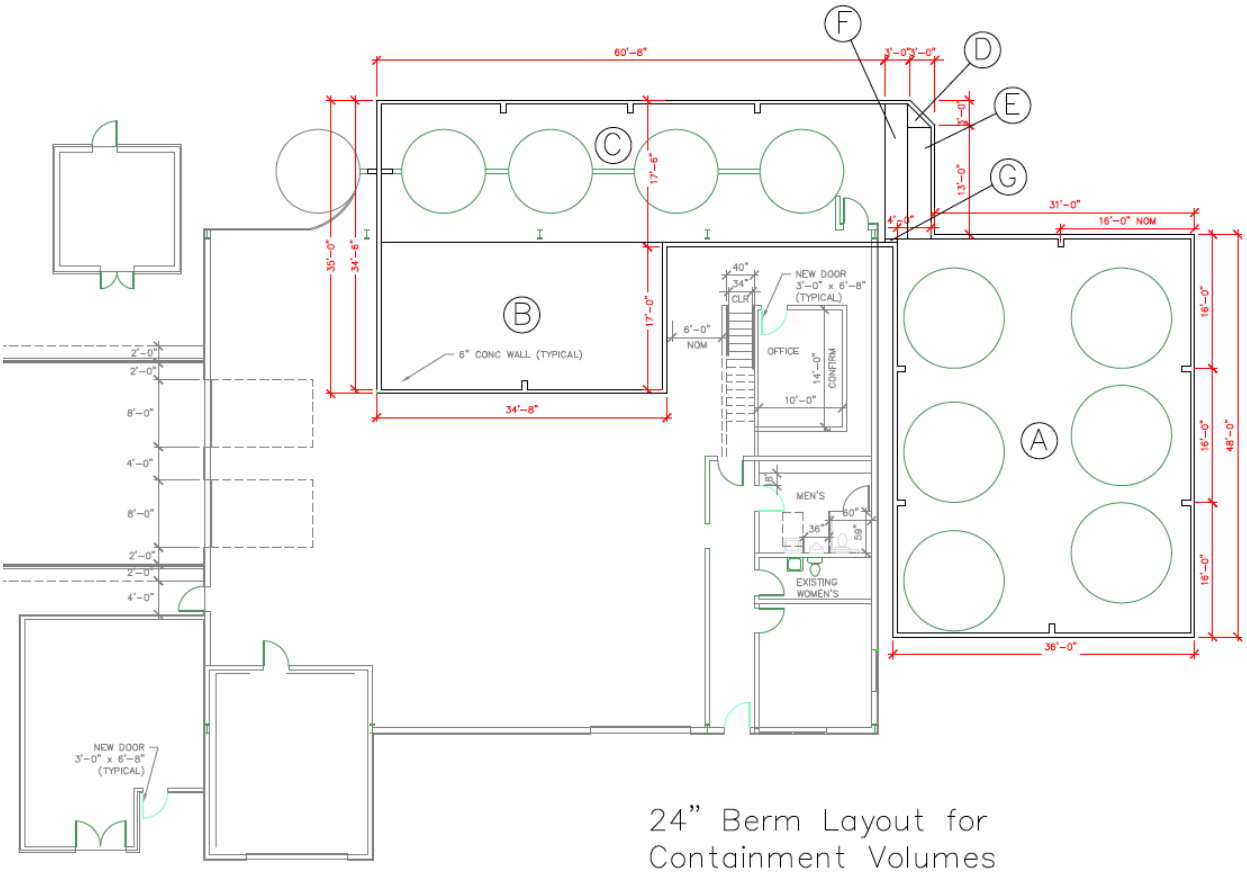
Date of Incident:	Responder:
INCIDENT DESCRIPTION	**What, where, when and who reported**
	Location: Time: Reported by: Responsible party: Was evacuation needed?
SPILL DESCRIPTION	Material spilled: Volume: Cause of release: Estimated volume discharged as described in CFR 112.1(b):* *Discharged to navigable waters of the US or adjoining shoreline. Description of all affected media:
CORRECTIVE ACTIONS TAKEN	**Include PPE and spill response equipment used**
NOTIFICATIONS	*Document all <u>names</u> of individuals and/or organizations that have been contacted.* ☐ Washington Emergency Management Division ☐ National Response Center ☐ Washington State Department of Ecology ☐ City of Puyallup ☐ EPA Region 10 ☐ Other _____
ELR MANAGEMENT CONTACTED	Management Assisting On-Site:
Additional Information	
Signature:	Date

Notification Report (cont'd)
Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information:

APPENDIX C

Calculation of Secondary Containment Capacity

The engineered secondary containment was sized for the largest tank (Tank 4; maximum storage volume 28,800 gallons) plus freeboard. The secondary containment exterior berm wall encompasses both the exterior and interior tank farms as shown on the following diagram received from the engineer:



The layout and dimensions shown above were used by Dave Ravander, PE, of ChemE Consulting, LLC in Longview, Washington to:

- Calculate square footage and volumes in each area.
- To calculate displacement volume of in-use tanks.
- To calculate necessary freeboard for a 25-year, 24-hour storm event (conservatively rounded up to a 4-inch storm depth).

The calculations use a conservative volume of 28,800 gallons maximum in Tank 4. As shown by the excel worksheet on the next page, the engineered secondary containment can accommodate 100% of the contents of the largest tank (28,800 gallons), freeboard (4,321 gallons) and has excess capacity of another 2,478 gallons.

TANK FARM CONTAINMENT VOLUME CALCULATION

Storage included in these three areas: Fifteen Aboveground Steel Tanks

Dimensions of Containment Area Segments:

AREAS	A	B	C	D	E	F	G
	Outside Tank Farm	Inside Poly Tanks	Tank Area in Drivethrough	new concrete top triangle	new concrete rectangle	Full Rectangle	Spillway
	Area A	Area B	Area C-O	Area C-1	Area C-2 A	Area C-2B	Area C-3
Length, ft	35.0	33.67	60.0	2.5	2.5	3.0	2
Width, ft	47.0	17.5	16.5	2.5	13.5	16	0.5
Effective Height, in	20.0	24.0	24.0	24.0	24.0	24.0	20.0
Elevation, Base, in	4.00	0	0	0	0	0	4.00
Volume (Gallons)	20,509	8,815	14,811	47	505	718	9

Largest Tank is Tank 4

Tank Capacity, gal 28,800

Estimated Displacement Volume Calculations			
Tank	gal/ft	Displaced, gal	
Tank 1	636	1,061	
Tank 2	636	1,061	
Tank 3	731	1,219	
Tank 4	606	1,010	
Tank 5	0	0	open bottom
Tank 6	0	0	open bottom
Tank 7	691	1,382	
Tank 8	648	1,295	
Tank 9	648	1,295	
Tank 10	0	0	open bottom
Tank 11		0	open bottom
Tank 12	155	310	
Tank 13	155	310	
Tank 14	523	871	
	Total	**9,815**	Gallons

Area Displaced by Tanks

Tank Number	Volume (Gallons)	Tank Shell	Cont. Section	Dimensions	Notes
1 & 2	25,454	steel	AREA A	127" D x 480" H	
3	25,600	steel	AREA A	132" D x 432" H	Tank Not Used
4	28,800	steel	AREA A	120" D x 594" H	
5 & 6	45,690	steel	AREA A	144" D x 720" H	Tank Not Used - bottom 6' of 60' height has no tank storage
7	24,881	steel	AREA C	132" D x 432" H	
8 & 9	19,430	stainless steel	AREA C	141" D x 360" H	
10 & 11	25,260	steel	AREA C	126" D x 540" H	Tanks Not Used - bottom 6' of 45' height has no tank storage
12 & 13	1,500	poly	AREA B	64"" D x 116" H	Relocating Tanks From Ecolube Tacoma Plant
14	6,100	poly	AREA B	119" D x 140" H	Relocating Tank From Ecolube Tacoma Plant

=tanks not inspected by Mistras as they will not be in use

containment capacity = Length(ft) x Width (ft) x h(in)/12(in/ft) x 7.4805 gal/ft3

Containment Capacity: **45,415** gallons

Precipitation Allowance:

25-year, 24-hour amount*, in. 4 (Basis: NOAA 100yr-24hr Rainfall Event = 3.8")

Precipitation Area ft2 1733

Precipitation Amount, gal **4,321**

*Puyallup, WA (Western Regional Climate Center)

Total Available Secondary Containment:

Capacity - Precipitation - Displacement = Available Containment = **31,278** gal.

Excess capacity = Available Containment - Tank Capacity = **2,478** gal. at 100% of Largest Tank

Plus 4" Rainfall Event

Width (ft)	13.75
Length (ft)	72.2
Depth (in)	4
Volume (gal)	**2,475 Gallons Holdup in Truck Loading Station**

APPENDIX D

Spill Response Equipment Inventory

Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished at each location as needed.

Absorbent Socks (PIGS)	1 box (12 per box)
Absorbent mats	1 large roll
Absorbent Floor Dry	1 bag
Empty 55-gal drum (waste cleanup materials)	1 ea.
Non-sparking Shovel	1 ea.
Broom	1 ea.
Spill cleanup checklist and manual	1 ea.

APPENDIX E

Inspection Checklist

Copy and use the following form to document monthly and annual inspections.

SPCC MONTHLY INSPECTION LOG

Complete a minimum of EVERY calendar month.

Make copies of this form and use to document inspection compliance.
Completed forms must be kept onsite with the SPCC for a minimum of 3 years.

YEAR _____

ANNUAL INSPECTION to be held every AUGUST.

MONTH _____

Reminders: 1) Hold refresher SPCC Plan training for all oil-handling personnel and update briefing log in the SPCC Plan. 2) Check contact information for key employees and response/cleanup contractors and update in the SPCC Plan as needed.

Day: **Time:**

NAME TITLE SIGNATURE

Inspector has received training and is familiar with all aspects of the SPCC Plan. **(initial)** _____

1) Inspect all spill kits:

Are all supplies available? **Y / N**

Have any deteriorated or expired? **Y / N** *If yes, replacement is required.*

2) Inspect / review security:

Is a system in place for monitoring non-employee site visitors? **Y / N**

Is the security fence and entrance gate functioning as designed? **Y / N**

Is the building closed and locked whenever employees are not present? **Y / N**

Is the facility lighting sufficient to observe any discharges/releases/spills of oil? **Y / N**

3) Used oil storage and transfer:

Are all route trucks, tanker trucks and trailers compliant with DOT inspection and testing? **Y / N**
A copy of inspection records should be kept on file and available for review.

Do all drivers/operators meet the minimum DOT requirements and regulations for tank truck loading/unloading, have they been trained in proper discharge prevention procedures, and do they have a working knowledge of the site layout, the protocol for entering the facility, and loading/unloading protocol? **Y / N**

Visually inspect all bulk oil containers and equipment.

Any evidence of leaks? **Y / N** *If yes, promptly correct and cleanup.*

Any signs of deterioration? **Y / N**

Container foundations: any signs of instability or settlement? **Y / N**

Are liquid-level sensing devices (level gauges and alarms) operating properly? **Y / N** Test regularly.

Any damage to secondary containment structures? **Y / N**

Any signs of abrasion or wear to piping from pipe supports? **Y / N**

Any pipes, valve seals, gaskets, joints, valves or other appurtenances leaking or in need of repair? **Y / N**

Are all emergency stop switches, pumps and valves in working order? **Y / N**

Any signs of poor connection of tank fill and discharge pipes that could cause a discharge? **Y / N**

Any changes to oil containers or contents? **Y / N** **If yes, update to SPCC Plan required.**

Inspect area of transfer operations (outside secondary containment).

Any evidence of transfer protocol not being followed? **Y / N**

Any evidence of spills? **Y / N** *If yes, promptly cleanup, identify reason and correct.*

4) ANNUAL Containment Inspection:

In August, clean (if needed) and then conduct a thorough inspection of all floor surfaces and exterior berms of both the engineered secondary containment *and* the contained truck loading/unloading area. Look for wear and tear including hairline cracking or spalls. Complete a simple report with notes that documents areas to watch as well as any repairs conducted. *Immediately address any needed repairs.*

Please explain and describe corrective action taken or scheduled to remedy problems found. Reference by item number and attach additional pages as necessary.

DAILY TANK INSPECTION LOG

The facility must conduct daily inspections of tanks during normal operation (Mon-Friday 8a – 5p). During each inspection the following items must be inspected to ensure all tanks, piping, and secondary equipment is in good working condition to mitigate the risk of potential releases.

1. Ensure the secondary containment is free of holes or cracks
2. Tank exterior, piping, and valves are free of cracks, dents, or other damages that might impact the integrity of the system.
3. Piping, valves, and pumps show no sign of leaking
4. No sign of staining or liquid accumulation present around the tank

Please Note:* *By initially this document, I certify that all tanks, piping, and secondary containment has been inspected, any deficiencies have been documented above, and corrective actions have been identified to mitigate any potential of exposures that may negatively impact the environment.

Month/Year		Location # - Name	

Date / Time	Inspector	Deficiency Observed (See Above)				Initial
		1	2	3	4	
Comments/Actions Taken:						
Date	Inspector	Deficiency Observed (See Above)				Initial
		1	2	3	4	
Comments/Actions Taken:						
Date	Inspector	Deficiency Observed (See Above)				Initial
		1	2	3	4	
Comments/Actions Taken:						
Date	Inspector	Deficiency Observed (See Above)				Initial
		1	2	3	4	
Comments/Actions Taken:						
Date	Inspector	Deficiency Observed (See Above)				Initial
		1	2	3	4	
Comments/Actions Taken:						

APPENDIX F

Employee Education Program and Training Log

Copy and use the following form to document employee briefings and training.

SPCC PLAN
Record of Annual Discharge Prevention Briefings and Trainings

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date: _____

Instructors: _____

Subjects Covered:

Employees in Attendance:

Name (printed)	Signature

APPENDIX G

Tank Truck Loading/Unloading Procedures

EcoLube Recovery

Tank Truck Loading/Unloading Procedures

Operators must wear all protective gear when unloading or loading a truck, including safety glasses and protective gloves!

Unloading Procedures

1. Determine that the truck's brakes are set. Block the wheels of the truck with chocks.
2. Determine the volume on the truck.
3. Open all dome lids on truck.
4. Determine what product is on the semi, and which tank it should be offloaded to for proper storage.
5. A sample must be taken on all incoming loads, for management plan acceptance tests (ex: clor-d-tect, pH, etc.). Profiles, Bill of Lading, and all other paperwork should be reviewed as well, in order to ensure acceptability of the material. Be sure to keep a retain sample, labeled with the date, customer and/or driver information, test results, and receiving number ticket.
6. Hook up the hose to the truck plumbing.
7. Secure cam-lock ears with lock pins or duct tape (or the equivalent) to prevent accidental hose disconnection.
8. Open the valves to the tank farm pump.
9. Check tank measurement to see if there is room to offload the total amount on the truck into the tank.
10. Open the rest of the valves to the tank you are unloading to.
11. Turn on the pump.
12. Check the truck or the truck gauge to see the level of material remaining in the truck.
13. When the truck is empty, close the valves from the truck to the pump.
14. Turn off the pump.
15. Close the rest of the valves to the tank.
16. Disconnect the hose from the truck. Ensure that all dome lids are closed, and all hoses are capped, and cam-locks on the truck are capped and plugged.
17. Remove the chocks from the wheels of the truck.

PERSONNEL RESPONSIBLE FOR THE LOADING / UNLOADING PROCESS MUST:

- ✓ Remain in attendance with the vehicles being loaded / unloaded AT ALL TIMES.
- ✓ Unless checking tank levels, the operator should remain **in close proximity to** the load / unload pump and controls to shut it down quickly in the event of a release.
- ✓ **Cell phone use during the load / unload process is strictly prohibited.**

Loading Procedures

1. Determine that the truck's brakes are set. Block the wheels of the truck with chocks.
2. Closely inspect truck for discharges from all drains and outlets. Tighten, adjust or replace equipment as necessary to prevent asphalt from discharging while in transit.
3. Determine the volume on the truck (make sure the truck is empty before loading).
4. Open all dome lids on truck.
5. Determine what product is going to be loaded onto the semi, and which tank it should be loaded from.
6. Lower the walkway platform onto the truck.
7. Move the loading spout to the manhole opening with the chain to lock it in place.
8. Open the tank valves to the pump.
9. Open all valves from the pump to the truck.
10. Turn on the pump using the controls on the loading platform.
11. Fill the compartment of the truck up to the loading marks – do not overfill.
    Note: Each truck has different loading marks – do not assume where these marks are.
12. Turn off the pump.
13. Move the truck forward until the next compartment is reached.
14. Continue filling until all the compartments are filled, or until you have the amount of product on the truck you need.
15. Remove the loading spout and lock chain from the truck.
16. Raise the walkway platform.
17. Ensure that all dome lids are closed, and all hoses are capped, and cam-locks on the truck are capped or plugged.
18. Closely inspect truck for discharges from all drains and outlets. Tighten, adjust or replace equipment as necessary to prevent asphalt from discharging while in transit.
19. Remove the chocks from the wheels of the truck.

NOTE: All materials being shipped out need to have quality control tests completed before sending the material to the customer. Outgoing oils need to be tested for water content, CDT, Flash Point, API, Solids Content, and Pounds per Gallon. Also, a shipping receipt needs to be filled out (then call for a shipping ticket to be made & faxed to you). Be sure to fill out the log sheet for outgoing oil, and keep a retain sample labeled with the date, customer and/or driver information, test results and shipping ticket number.