SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

TOWNSHIP OF WOODBRIDGE

WOODBRIDGE AVENUE PUMP STATION

201 Woodbridge Avenue
Woodbridge, New Jersey 07095

Prepared by
Woodbridge Township, Division of Engineering

September 25, 2017

Table of Contents

Page

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

INTRODUCTION
Purpose……3
Using the Plan……...……3

MANAGEMENT APPROVAL
Management Approval 40 CFR 112.7……4
Professional Engineer Certification 40 CFR 112.3(d)……4

MANAGEMENT REVIEW
Management Review……...……5
Plan Review 40 CFR 112.5……..……6

LOCATION OF SPCC PLAN
Facility Description [112.7(a) (3)]……...……8

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION
Certification……...……..…9

GENERAL FACILITY INFORMATION
Contact Information……...……..…….……10

POTENTIAL SPILL SOURCE
SPCC Compliance [112.7(a) (1) & 112.7(a) (2)J…….……12-16

SPILL RESPONSE AND REPORTING
SPCC Features and Operating Procedures [112.7(a)(3)]……17-26

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PROVISIONS
Potential Discharge Volume and Direction of Flow [112.7(b)] and Containment [112.7(a)(3)(iii)]
APPENDIX A: Facility Diagrams
APPENDIX B: Monthly Inspection Checklist
APPENDIX C: Discharge Prevention Briefing Log
APPENDIX D: Discharge Notification Procedures
APPENDIX E: Discharge Notification Form
APPENDIX F: Equipment Shut-off Procedures
APPENDIX G: Written Commitment of Manpower, Equipment and Materials
APPENDIX H: Oil Spill Contingency Plan

Introduction

Purpose

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by the Township of Woodbridge ("Township) to prevent oil discharges from occurring, and to prepare the Township to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. In accordance with United States Environmental Protection Agency (USEPA) oil pollution prevention regulations (40 CFR 112), Woodbridge must prepare and implement an SPCC plan for non-transportation related facilities that could reasonably be expected to discharge oil into or upon navigable waters or adjoining shorelines; and meet one of the following conditions:

- Above-ground oil storage capacity exceeds 1,320 gallons; or
- Underground oil storage capacity exceeds 42,000 gallons, unless the underground tanks are subject to all of the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281. (New Jersey approved program is regulated under N.J.A.C. 7:14B.)

As defined by 40 CFR Part 112, oil includes all grades of motor oil, hydraulic oil, lube oil, fuel oil, gasoline and diesel, automatic transmission fluid, waste oil, and transformer di-electric fluid. The definition of oil also includes non-petroleum oils such as animal or vegetable oils and synthetic oils.

The Woodbridge Avenue Pump station currently stores greater than 1,320 gallons of petroleum products in containers 55-gallons and greater. Potential spills from these oil storage locations do have the potential to either leave the property in question or impact navigable water bodies. It is for these reasons this plan has been prepared.

1.1.1 Using the Plan

In addition to satisfying a regulatory requirement, this SPCC plan should be a working document at the facility. The plan should be used frequently in the following ways:

- As a reference for oil storage and containment system information.
- As a tool for informing new employees and refreshing current employees on practices for preventing and responding to oil spills.
- As a guide to the required annual training program for employees.
- As a guide to the required monthly facility and tank inspections.
- As a resource during an emergency response.
- As a tool to address the facility's operation and maintenance procedures.

Management Approval

40 CFR 112.7

Woodbridge Township is committed to the prevention of discharges of oil into navigable waters or the environment, and maintains the highest standards for spill prevention control and countermeasures through periodic review, updating, and implementation of this Spill Prevention Control and Countermeasure (SPCC) Plan. Woodbridge will provide the necessary manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful. Township's management has committed the necessary resources to implement the measures described in this Plan.

Joseph Kotowski is the Designated Person Accountable for Oil Spill Prevention at this Township facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative:	Joseph T. Kotowski
Signature:	Joseph T. Kotowski
Title:	Superintendent
Date:	September 25, 2017

Professional Engineer Certification

40 CFR 112.3(d)

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [112.3(d)] 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.

Michael J. Gelin — Signature

September 25, 2017 — Date

PE Seal
Michael J. Gelin
NJ #048928005

Michael J. Gelin, P.E.
Name of Professional Engineer

04892800 — Registration Number

New Jersey — Issuing State

Management Review

A review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, Woodbridge will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if:
(1)such technology will significantly reduce the likelihood of a spill event from the facility, and
(2) if such technology has been field-proven at the time of review.

This SPCC Plan will also be amended within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.
Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer or self-certified by the facility representative if the facility meets the following criteria:
1. The facility must have 10,000 gallons or less in aggregate aboveground oil storage capacity,
2. The facility must not have had (1) a single discharge of oil to navigable waters exceeding 1,000 U.S. gallons, or (2) two discharges of oil to navigable waters each exceeding 42 U.S. gallons within any twelve-month period, for the three years prior to the SPCC Plan certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years.

The Facility Representative must also attest to the following:
1. The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the rule requirements;
2. Procedures for required inspections and testing have been established;
3. The Plan is being fully implemented;
4. The facility meets the qualifying criteria;
5. The Plan does not deviate from rule requirements except as allowed and as certified by a PE; and
6. Management approves the Plan and has committed resources to implement it

Review Dates	**Signature**	**Amendment Required? (Y/N)**
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Plan Review

40 CFR 112.5

In accordance with 40 CFR 112.5, the Township of Woodbridge periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge. Township reviews this SPCC Plan at least once every five years. Revisions to the Plan, if any are needed, are made within six months of this five-year review. Township will implement any amendment as soon as possible, but not later than six months following preparation of any amendment. A registered PE certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d).

Scheduled five-year reviews and Plan amendments are recorded in Table 0-1. This log must be completed even if no amendment is made to the Plan. Unless a technical or administrative change prompts an earlier review, the next scheduled review of this Plan must occur by *August 25, 2022.*

SPCC Plan Revisions
Woodbridge must review and recertify the SPCC Plan every 5 years. Woodbridge must also revise this SPCC plan following any change in the facility design, construction, operation or maintenance that would affect the facility's potential for discharging oil. Revisions must occur as soon as possible, but no later than six months following the change. The operations manager or his designee is responsible for initiating and coordinating such revisions.

Facility information related to the SPCC plan must be submitted to the United States Environmental Protection Agency (USEPA) Regional Administrator within sixty days whenever the facility discharges more than 1,000 gallons in a single event, or discharges more than 42 gallons of oil in each of two spill events within a 12-month period. The information must be sent to the following address:

MAIN REGIONAL OFFICE
290 Broadway
New York, NY 10007-1866 Phone: 212-637-3000

If the facility has Self Certified any plan amendments and experiences a reportable spill, the EPA Regional Administrator will determine if the facility must rescind their eligibility and have the plan certified by a Professional Engineer.

Table 1: Record of Plan Review and Changes

Date	Authorized Individual	Review Type	PE Certification	Summary of Changes
09/25/17	Michael Gelin	Initial Plan	Yes	N/A
09/25/17	Joe Kotowski	Initial Plan	No	N/A.

Location of SPCC Plan

40 CFR 112.3(a)

Facility Description [112.7(a) (3)]

Location & Use

The Woodbridge Ave. Pump station (Pump station) is located in a mixed industrial area of in Middlesex County, New Jersey. The facility consists of a pump station building and an emergency generator building. These buildings are surrounded by employee parking lots. The Woodbridge Ave. Pump station is bordered to the north and east by a tributary to the Arthur Kill. To the south is Woodbridge Ave. and to the west is the New Jersey Turnpike.

A site location map is included with this Plan.

Waterways and Abutters

All stormwater and surface water flows drain into storm drains located both on the property and immediately outside the main entrance to the property all of which empty in the tributary of the Arthur Kill located east of the property. Storm drains are located throughout the asphalt parking lot which surrounds the Pump station.

Site Drainage

Site drainage has been determined based on existing topographic surveys and current visual observations. All stormwater flows south and south east into the Arthur Kill.

Spill History

The Pump station has not experienced any petroleum releases which have left the site property boundaries or impacted a navigable water body in the past three years which exceeded 1,000 gallons in any single event or more than 42 gallons in multiple events.

Certification of Substantial Harm Determination

40 CFR 112.20(e), 40 CFR 112.20(f)(1)

Facility Name: **Woodbridge Ave Pump station**
Facility Address: **201 Woodbridge Avenue, Woodbridge, NJ 07095**

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.

Joseph Kotowski	*Superintendent*
Signature	Title
Joseph Kotowski	*September 25, 2017*

Name (type or print) Date

PART I - GENERAL FACILITY INFORMATION

40 CFR 112.7(a)(3)

Company Information

Name of Facility:	Township of Woodbridge
Type	Pump Station
Date of Initial Operation	2002
Location	201 Woodbridge Avenue Woodbridge, NJ 07095
Name and Address of Owner	Township of Woodbridge *Town Hall* One Main Street Woodbridge, New Jersey 07095

Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the Safety Officer, Joseph Kotowski 24-hour contact information is provided in Table 1-1.

Table 1-1: Facility contact information

Name	Title	Telephone	Address
Dennis Henry	Director, Department of Public Works	(732) 921-5770 (cell)	100 Mary Avenue Fords, NJ 08863
Carmine Barbato	Road Superintendent, Department of Public Works	(732) 738-1311 (office) (732) 887-2733 (cell)	807 Coolidge Avenue Woodbridge, NJ 07095
Brian Burke	Superintendent, Buildings and Grounds Department of Public Works	(732) 634-4500 (office) (732) 675-4619 (cell)	91 Old Road Sewaren, NJ 07077
Joseph C. Grecus	Safety Officer, Department of Public Works	(732) 738-1311 (office) (732) 570-0147 (cell)	64 Beech Street Fords, NJ 08863
Joseph Kotowski	Superintendent, Waste Water, Department of Public Works	(732) 726-7030 (office) (732) 675-3947 (cell)	25 Stanford Avenue Colonia, NJ 07067
Joseph Rudy	Manager, Motors, Department of Public Works	(732) 738-1311 (office) (732) 585-6585 (cell)	68 Cornell Street Avenel, NJ 07001
John Mazza	General Supervisor, Sanitation, Department of Public Works	(732) 738-1311 (office) (732) 585-7475 (cell)	343 Cypress Drive Colonia, NJ 07067
James Cipas	General Supervisor, Sanitation, Department of Public Works	(732) 738-1311 (office) (732) 585-9909 (cell)	183 Beacon hill Road Morganville, NJ 07751
Thomas Patten	Superintendent, Buildings & Grounds, Department of Public Works	(732) 343-2548 (cell)	512 Francis Avenue Woodbridge, NJ 07095
George Brew	Superintendent, Parks Water, Department of Public Works	(732) 609-7033 (cell)	168 Woodland Avenue Fords, NJ 08863
Patrick Kenny	OEM Coordinator, Police Department	(732) 425-2157 (cell)	

POTENTIAL SPILL SOURCES AND SPCC FEATURES
SPCC Compliance [112.7(a) (1) & 112.7(a) (2)J

A description of all applicable oil storage tanks and vessels has been included in Section 2.2 of this document. The following descriptions detail the size and location of all petroleum product storage at the Pump station, including all associated loading and unloading areas:

- **6,000 Gallon Gasoline AST**

This double walled convolute tank is located near the southeast portion of the Pump station facility. The tank is equipped with a spill bucket; and is stick tested manually once a week. This tank is also equipped with an emergency shut-off switch. A visual sight gauge is present on this tank which serves as a means of overfill protection during bulk fueling operations. A spill kit is located nearby to the tank.

A spill originating from this tank would flow onto the surrounding impervious asphalt surface and flow towards pervious ground or storm drains in the nearby parking lot.

The vehicle fueling area and bulk oil transfer area are both located adjacent to the AST on an impervious surface. A likely release from this location would flow southwest approximately 100' into the storm drains in the nearby parking lot.

The necessary improvements to this tank are detailed in Section 4.0 of this document.

- **4,000 Gallon Diesel UST**

The 4,000 gallon diesel UST is not applicable to this SPCC plan however the bulk delivery area and vehicle fueling area associated with this UST system is applicable to SPCC regulations. The vehicle fueling area and bulk oil transfer area are both located adjacent to the 4,000 gallon AST detailed above, on an impervious surface. A likely release from this location would flow southwest approximately 80' into the storm drains in the nearby parking lot.

The necessary improvements to this tank's bulk delivery area and vehicle fueling area are detailed in Section 4.0 of this document.

- **483 Gallon Dielectric Oil AST**

This oil filled electrical transformer is located outside the generator building on an elevated concrete pad surrounded by a chain-link fence. Surrounding the north side of the concrete pad is approximately 8' of crushed stone.

A spill originating from this tank would flow onto the surrounding impervious concrete and then onto the surrounding pervious crushed stone ground located below.

There are no improvements necessary for this storage area.

- **55 Gallon Drums**

Varying amounts of 55-gallon steel drums of various motor and lubricant oils are located at the rear loading area of the Pump station main building. These drums are not staged on the spill pallets with sufficient capacity to capture the volume of the single largest container stored on the pallet. New drums are periodically delivered to the Pump station facility as needed and the empty drums are removed off-site. Absorbent materials and spill pads are located adjacent to the drum storage area in order to address any potential spills.

The necessary improvements required for the drum storage area are detailed in Section 4.0 of this document.

ABOVEGROUND STORAGE TANKS

The below calculations will be used for spill prevention and planning purposes. The estimated spill volumes from the fuel delivery and waste oil pickup vehicles detailed below have been calculated using data obtained from commercial fuel vendors, and is based upon the most likely type of spill to occur from a product delivery hose rupture or disconnect. For fuel delivery, a maximum fuel rate of 220 gallons per minute and a hose diameter of 3 inches have been used, which depicts the highest likely fuel transport rate from a tanker and maximum hose diameter that is used at the site.

The fueling rate could be less at times due to fuel delivery by a smaller truck and small diameter hose, or the delivery of heavier weight fuels. The estimated spill volume also includes the amount of fuel that could be stored in a 3 inch diameter product line with a maximum length of 150 feet. This represents the maximum length of product hose that would be used at the site. A maximum spill response time of 3 minutes has been used to reflect the time required for the vehicle operator to shut down the fuel delivery vehicle upon identification of a likely leak from the hose of hose connections. An additional 10% of the estimated spill volume has been added as a safety factor to account for conditions such as rain events during product delivery. Please note that for waste oil removal the estimated spill volume was calculated to be the hose volume

Table 1-2: Characteristics of oil containers

Maximum Hose Diameter = 0.25 feet	Maximum Hose Length = 150 feet
Maximum Flow (Pumping) Rate = 220 gpm	Estimate Response Time = 3 minutes
1 Cubic Foot= 7.48 gallons	
Hose Volume = /4 (Hose Diameter)\Hose Length)= 0.785(0.0625)(150) = 7.36 cubic feet = 55.1 gallons	

Estimated Likely Spill Volume from Bulk Oil Delivery = ((Flow Rate) (Response Time)+ (Hose Volume)) 10% Safety Factor
= ((220) (3) + (55.1)) 1.10
= 786.61
787 gallons

Estimated Likely Spill Volume from Waste Oil Removal
= (Hose Volume) 10% Safety Factor
= (55.1)) 1.10
= 60.61
61 gallons

Estimated Likely Spill Volume from routine vehicle fueling
= Max pumping rate of either fuel dispenser x likely operator response time
= 15 gallons per minute x 2 minutes = 30 gallons
30 gallons

ABOVEGROUND STORAGE TANKS, BULK DELIVERY AREAS AND VEHICLE FUELING AREAS					
CAPACITY (gallons)	**PRODUCT (locations)**	**HIGH LEVEL ALARM**	**LEAK DETECTION**	**ESTMATED SPILL DIRECTION & ANTICIPATED VOLUME**	**EXISTING CONTAINMENT & SPILL CONTROL FEATURES**
6,000	Gasoline (Vehicle Fueling Area)	Yes	Monthly Manual Monitoring	**Estimated spill volume from fuel delivery vehicle** = 787 gallons Spill from dispenser and delivery truck will flow on asphalt surface towards pervious ground Piping/dispenser leak rate gradual to 45 gallons per minute (maximum loss= 6,000 gallons) Spill from piping & dispenser will flow on asphalt surface and towards pervious ground. Tank leak rate = gradual to 6,000 gallons Spill from tank failure will flow on asphalt surface and flow towards pervious ground.	Double-walled tank on concrete pad. Delivery and refueling area is made of asphalt.
4,000	Diesel UST (Vehicle Fueling Area)	*NIA*	*NIA*	Estimated spill volume from fuel delivery vehicle = 787 gallons Spill from dispenser and delivery truck will flow on asphalt surface towards pervious ground Dispenser leak rate =	Delivery and refueling area is made of asphalt

				gradual to 45 gallons per minute (maximum loss = 4,000 gallons). Spill from piping and dispenser will flow on asphalt towards pervious ground	
483	Dielectric Oil (Transformer)	*No*	*Visual Inspection*	Tank leak rate = gradual to 483 gallons Spill from tank failure will flow into concrete containment surrounding tank then onto pervious ground	Transformer located on elevated concrete pad. Base of concrete pad has crushed stone border.

55 GALLON DRUM STORAGE					
BLDG OR LOCATION	**N^{o}. OF DRUMS**	**PRODUCT**	**NEAREST DRAIN**	**ESTMATED SPILL DIRECTION & RATE**	**CONTAINMENT & SPILL CONTROL FEATURES**
Main Building	Varies	Transmission Fluid, Motor Oil, Grease	Floor drain to sanitary sewer inside building	Gradual to 55 gallons Spill from drum failures would be on collect on concrete.	Impervious concrete floor

Conformance with Applicable State and Local Requirements [112.7(j)]

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 New Jersey. All discharge notifications are made in compliance with local, state, and federal requirements.

PART II. SPILL RESPONSE AND REPORTING

40 CFR 112.7

Discharge Prevention

SPCC Features and Operating Procedures [112.7(a)(3)]

Pump Station employees are trained to implement spill prevention practices for work with and around oil sources. DPW personnel shall use common sense and rely on spill prevention practices at all times to minimize the potential for a release of oil.

For example, the following "common sense" practices are recommended:

- Keep container lids securely fastened at all times;
- Do not leave portable sources unattended (outside);
- Return portable sources to their storage location after use;
- Use pads, drip pans, and funnels when transferring petroleum products from a portable container;
- Protect oil sources from damage from moving equipment;
- Do not store oil sources near catch basins or floor drains; and
- Loading and unloading of petroleum products shall be attended at all times.

Woodbridge is responsible for all activities performed within the DPW property and will observe the implementation of spill prevention activities by the fuel suppliers, and will also implement spill prevention measures for vehicle filling and truck unloading operations. Spill prevention during oil deliveries (off-loading) is primarily the responsibility of the supplier; ensuring the proper operation of all bulk delivery vehicles, until the product is safely in the tank or vessel. However Woodbridge DPW is ultimately responsible for ensuring the successful delivery of bulk oil which occurs on DPW property. This will be performed through the continuous oversight of all bulk product transfers by a trained Woodbridge employee.

Supplier Approval

In the event Woodbridge changes fuel suppliers and brings a new supplier onsite, the Township must ensure that the vendor understands the site layout, knows the protocols for entering the site and unloading product, and has the necessary spill equipment on board to respond to a spill from the vehicle. The Township must also ensure the vendor has all required DOT approvals and certification for oil transportation and delivery. This Supplier Approval process ensures that the vendor meets the minimum requirements and regulations for tank truck unloading as established by the United States Department of Transportation.

Pump Station Observation of Deliveries

The facility manager, or designee, will supervise deliveries from all oil suppliers and waste oil removal contractors. Delivery actions and observations must include the following:

1. Verify delivery truck contains type and quantity of oil ordered. For waste oil pickup truck, verify that the tank on the truck has room to contain the entire volume of the waste oil tank. Transfer of product should take place during daylight hours in non-rain events if practical.

2. Determine level and volume of fuel in tank to ensure tank can accept volume ordered.

3. Tank truck to be accompanied by trained operator and Woodbridge employee prior to unloading or loading. Personnel shall verify correct fill port on tank is accessed and verify that spill response materials are present.

4. Fuel transfer containment device (where applicable) must be inspected to ensure it is closed prior to product transfer. Ensure all drainage valves are closed at containment area.

5. Extinguish all nearby ignition sources within 50 feet of transfer area.

6. Tank truck brakes shall be set and the driver shall remain with the vehicle during the entire unloading period.

7. Inspect hose connections for drips/spillage. Spill pads should be used to capture product.

8. Ensure that the tank vent line is open and unobstructed.

9. Prior to filling (and again prior to departure of tank truck), the lowermost drain and all outlets of the tank truck shall be examined for spillage.

10. Truck drive to place collection bucket below tank truck unloading valve for any drips.

11. DPW employee observing fuel transfer inspects the fuel transfer area for any releases. If any spill occurs during the fuel transfer process, the process shall immediately cease and the DPW spill reporting procedures shall be followed.

12. Gravity drains all hoses into the tank.

13. Inspect and clean (where applicable) fill port containment system.

14. Open gate valve and/or remove and store storm drain covers near fuel delivery area (and waste oil transfer area) if no spills or spills were observed.

Pump Station Vehicle and Equipment Fueling Practices

DPW personnel authorized to dispense fuel should comply with the following procedures to assist in the safe transfer of petroleum product into equipment or vehicles:

1. Verify container or vehicle is compatible with the fuel to be dispensed.
2. Vehicle or container to be positioned as close as possible to fuel pump.
3. Remove all ignition sources.
4. Fuel dispenser nozzle is to be placed as far as possible inside the vehicle or container fill port
5. Inspect all nozzles, connections, hoses for spillage or damage. Notify on site supervisor if damage or spills are observed.
6. Attend dispenser at all times during product transfer.
7. Remove nozzle, hold upright, inspect for spills, and return to dispenser.
8. In the event of an overflow, contain/remove spill immediately and notify the onsite supervisor.

Tests and Inspections [112.7(e)]

The personnel at the facility shall perform testing, inspection, and maintenance of all petroleum equipment to keep it performing in an efficient and environmentally sound manner. The tests and inspections shall be performed as discussed in the following subsections.

Inspecting ASTs

Facility personnel must visually inspect all ASTs (tanks and aboveground piping systems) monthly during operating hours. The ASTs shall be monitored monthly for spills through manually gauging of the spill detection port. The results of all inspections and monthly spill detection monitoring shall be recorded on the Woodbridge Tank Inspection Sheet. The report shall be kept for at least three years in a file maintained onsite.

Monthly inspections include observations of the exterior of the tank for signs of deterioration or spills (spills), observations of the tank foundation and supports for signs of instability, and observations of the vent, fill and product pipes for signs of poor connection or failure, that could cause a spill.

In addition to these inspections, the facility will verify the integrity of each tank system every ten years, or more often as deemed necessary by the inspection results. Integrity testing will be conducted in accordance with an industry standard procedure such as STI - SPOOl-00 or API 653. The results of the integrity inspections shall be maintained on-site for the life of the system.

Tank Maintenance

All petroleum tank and piping problems shall be immediately reported to the onsite supervisor. Visible oil spills (spills) that cause a loss of oil from tank walls, piping or other components shall be repaired or replaced immediately to prevent the potential for a major spill from the source. This is especially important for sources located outside or near drains or catch basins that discharge to the environment.

Secondary Containment Inspections

The bulk storage secondary containment areas shall be inspected monthly for the accumulation of oil and rainwater (if applicable). The inspection should include whether the containment is full of rainwater, oil, or an oil/water mixture (the latter is determined if there is a sheen floating on the water).

If the contained liquid is water with no visible sheen, it can be discharged into the storm water collection system. However, if there is oil, or an oil/water mixture (i.e. sheen or other indicator), the cause of the oil spill must be determined and the oil or mixture needs to be removed and disposed of as waste.

The Woodbridge Tank Inspection Sheet provides a checklist for the inspection of the secondary containment structures.

Inspecting Drums

All drums on-site shall be visually inspected monthly for indications of a release, or signs of a pending failure. Drums shall be inspected for indications of spills or spills to ensure they are sealed, and exteriors shall be inspected for signs of deterioration, corrosion and bulging. Drum spill platforms shall also be inspected for oil and water. Indications of a potential or confirmed spill shall be reported to the site supervisor.

The Woodbridge Tank Inspection Sheet provides a checklist for the inspection of the drums.

3.1.3 Training /112.7(/)J

Woodbridge shall provide SPCC spill training for personnel involved with handling petroleum products. The site supervisor or operations manager shall arrange for annual training, which shall include the following training topics:

An introduction to pollution control laws;

- Rules and regulations pertaining to the use and storage of petroleum products;
- Inspection, operation and maintenance of spill equipment, and petroleum storage and dispensing equipment;
- Facility requirements relative to bulk product deliveries and removals;
- Procedures for product transfer to vehicles, equipment and portable containers;
- Discussions of spill events or equipment failure, and updates made to the SPCC plan to address future spills;
- Spill response and cleanup;
- Spill notification and record keeping; and
- Spill prevention practices.

Records of attendance at training and topics covered shall be maintained onsite for a period of three years.

Documentation for Training

The annual SPCC training shall be documented to include the instrnctor's name, course outline, date and duration of training, attendant's names and signatures, and corrective action list for areas in need of improvement, if any.

3.1.4 Security /112.7(g)J

The Pump Station operates 24 hours per day, seven days a week. The site is manned 24 hours per day and is completely fenced. The entire facility also contains sufficient outdoor lighting when required for proper and safe operation, and to assist in the identification of a spill.

All buildings all locked when not in use which prevents access to all tanks and drums stored inside. Fuel pumps are shut off when the facility is closed, which prevents unauthorized use.

All fuel tanks should be locked closed if the facility has trouble preventing off-hour deliveries. A representative of the Pump Station should be present during all bulk transfer operations. Woodbridge at its discretion may choose to lock all relevant fill ports.

3.2 Emergency Response

This section describes the cleanup response and protocols to follow in the event of an oil spill. The uncontrolled discharge of oil to groundwater, surface water or soil is prohibited by State or Federal laws. It is imperative that action be taken to respond to a spill once it has occurred. In

the event of an oil spill, depending on the volume and characteristics of the material released, the Pump station has defined spill response as either a "Minor Spill Response" or "Major Spill Response" ("Spill Emergency").

A list of Emergency Contacts is included with this Plan.

Spill Kits located on-site at various locations near oil storage and transfer areas can contain the following items, this list should be used as guidance for purchasing and/or restocking spill kits at the Pump station:

- Oil Absorbent Materials such as Speedy Dry, Socks, Pads and pillows;
- Personal protective equipment such as gloves, goggles and Tyvek suits;
- Containers and bags to store and dispose of oil impacted materials;

The Woodbridge Tank Inspection Sheet contains an inspection checklist for the equipment contained within the spill kits.

Minor Spill Response [112.7(a) (3) (iv)]
A "Minor Spill Response" is defined as one that poses no significant harm to human health or the environment. These spills involve generally less than 5 gallons and can usually be cleaned up by trained Woodbridge personnel. Other characteristics of a minor spill include the following:
- The spilled material is easily stopped or controlled at the time of the spill;
- The spill is localized;
- The spilled material is not likely to reach surface water or groundwater;
- There is little danger to human health; and
- There is little danger of fire or explosion.

In the event of a minor spill the following guidelines shall apply:
- Immediately notify the facility supervisor or designee.

- Call the New Jersey Department of Environmental Protection (1-877-927-6337) within 15 minutes if the spill has impacted soils, groundwater, or surface waters of the state.
- Under the direction of the facility supervisor or designee, contain the spill with spill response materials and equipment.
- Place spill debris in properly labeled waste containers.
- Complete the Spill Notification Form and send to the Regulatory Compliance Manager.

Major Spill Response (Spill Emergency) [112.7(a) (3) (iv)]
A "Spill Emergency" is defined as one involving a spill that cannot be safely controlled or cleaned up by trained Woodbridge personnel using available on-site spill response equipment. Characteristics include the following:
- The spill is large enough to spread beyond the immediate spill area;
- The spilled material enters surface water or groundwater (regardless of spill size);
- The spill requires special training and equipment to cleanup;

In the event of a spill emergency, the following guidelines shall apply:

- All workers shall immediately evacuate the spill site and move to a safe distance away from the spill.
- Immediately notify the facility supervisor or designee of the spill.
- Facility supervisor or designee shall call for medical assistance if workers are injured (no worker shall engage in rescue operations unless they have been properly trained and equipped).
- Facility supervisor or designee shall notify if necessary the local Fire Department or Police Department by calling 911.
- Facility supervisor or designee shall immediately contact the New Jersey Department of Environmental Protection (1-877-927-6337) within 15 minutes and the National Response Center (1-800-424-8802). Document the telephone calls on the Spill Notification Form.
- Facility supervisor or designee will coordinate cleanup and seek assistance from a cleanup contractor as necessary.
- Complete the Spill Notification Form and send to the Regulatory Compliance Manager.

Waste Disposal [112.7(a) (3) (v)J

Wastes resulting from a minor spill response will be containerized in impervious bags, drums or other sealed containers. The waste will be removed from the site by a licensed waste hauler to a permitted facility. The timeframes and procedures for on-site storage shall comply with the NJDEP Solid and Hazardous Waste Regulations. Non-hazardous waste shall be stored in covered and labeled containers, or covering with and on top of plastic sheeting. Non-hazardous waste shall not be staged on-site for more than 6 months from the date of generation.

Wastes resulting from a major spill response will be removed and disposed of by a licensed waste cleanup contractor.

Notification and Reporting [112.7(a) (4)]

In the event of a minor spill, the facility supervisor or designee should complete a written Spill Notification Form. This form details the time, material, and quantity of oil released.

If a major spill occurs at this facility the facility supervisor or designee shall, in addition to the notification procedures above, provide written information to the EPA Regional Administrator as required by the SPCC Plan rules, where necessary. A copy of this information must also be provided to the appropriate New Jersey Department of Environmental Protection Bureau deemed responsible for oversight of the spill.

Spill Notification Forms

After making the appropriate communications with Regulatory Agencies and subsequent to the containment of the spill, a Spill Notification Form, shall be completed and kept onsite with this plan. The Spill Notification Form includes a checklist to document the proper notification of federal, New Jersey and local agencies. The form shall be filed by facility name and maintained as long as Woodbridge owns and/or operates this facility. When completed, the SPCC coordinator should keep the Spill Notification Form on file for a period of at least three (3) years for future USEPA inspections.

Area Plans
The United States Environmental Protection Agency (USEPA) and Coast Guard (USCG) administer Area Plans for spill contingency response by Region throughout the United States. The USCG covers coastal areas, and USEPA covers inland areas. In a major spill event, contacting the National Response Center hotline at (800) 424-8802 will trigger assistance from the appropriate agency, if needed.

2.1.1 Verbal Notification Requirements (Local, State, and Federal (40 CFR part 110))

Any unauthorized discharge into air, land or water must be reported immediately to the New Jersey Department of Environmental Protection Agency (NJDEP) as soon as the discharge is detected.

For any discharge that reaches navigable waters, or threatens to reach navigable waters, *immediate* notification must be made to the Environmental Protection Agency.

In the event of a discharge that threatens to result in an emergency condition, facility field personnel must verbally notify the New Jersey Emergency Hazardous Materials Hotline immediately, and in no case later than *within one (1) hour* of the discovery of the discharge. An emergency condition is any condition that could reasonably be expected to endanger the health and safety of the public; cause significant adverse impact to the land, water, or air environment; or cause severe damage to property. This notification must be made regardless of the amount of the discharge.

In the event of a discharge that does not present an emergency situation, verbal notification must be made to NJDEP from the 24-hour hotline including, weekends, and holidays; or by e-mail utilizing the Incident Report Form and procedures *within twenty-four (24) hours* of the discovery of the discharge.

2.3 Spill Mitigation Procedures

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge.

A complete outline of actions to be performed in the event of a discharge from DPW reaching or threatening to reach navigable waters is included in the facility Contingency Plan.

Reminder: *In the event of a discharge originating from the building, facility personnel must immediately implement the Oil Spill Contingency Plan. The Oil Spill Contingency Plan discusses the additional procedures that must be followed to respond to a discharge of oil to navigable waters or adjoining shorelines.*

In the event of a discharge, Township or contractor field personnel and the Safety Officer shall be responsible for the following:

2.3.1 Shut Off Ignition Sources

Field personnel must shut off all ignition sources, including motors, electrical circuits, and open flames. See Appendix F for more information about shut-off procedures.

2.3.2 Stop Oil Flow

Field personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge.

2.3.3 Stop the Spread of Oil and Call the Safety Officer

If safe to do so, field personnel must use resources available at the facility, *(see spill response material and equipment listed in Section 2.2)* to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., sand bags), or constructing earthen berms or trenches.

In the event of a significant discharge, field personnel must immediately contact the Safety Officer, who may obtain assistance from authorized company contractors and direct the response and cleanup activities. Should a discharge reach waterways, only physical response and countermeasures should be employed, such as the construction of underflow dams, installation of hard boom and sorbent boom, use of sorbent pads, and use of vacuum trucks to recover oil and oily water from the creek. If water flow is low in the waterways, construction of an underflow dam downstream and ahead of the spill flow may be advantageous. Sorbent material and/or boom should be placed immediately downstream of the channel to recover any sheen from the water. If water flow is normal, floating booms and sorbent boom will be deployed.

Vacuum trucks will then be utilized to remove oil and oily water at dams and other access points. Crews should remove oiled vegetation and debris from the channel banks and place them in bags for later disposal. After removal of contaminated vegetation, channel banks should be flushed with water to remove free oil and help it flow down to dams and other access points where it can be recovered by vacuum truck. At no time shall any surfactants, dispersants, or other chemicals be used to remove oil from the channel.

2.3.4 Gather Spill Information

The Superintendent will ensure that the *Discharge Notification Form* is filled out and that notifications have been made to the appropriate authorities. The Safety Officer may ask for assistance in gathering the spill information on the *Discharge Notification Form* of this Plan:

- Reporter's name
- Exact location of the spill
- Date and time of spill discovery
- Material spilled (e.g., oil, produced water containing a reportable quantity of oil)
- Total volume spilled and total volume reaching or threatening navigable waters or adjoining shorelines
- Weather conditions
- Source of spill
- Actions being taken to stop, remove, and mitigate the effects of the discharge
- Whether an evacuation may be needed
- Spill impacts (injuries; damage; environmental media, e.g., air, waterway, groundwater)
- Names of individuals and/or organizations who have also been contacted

2.3.5 Notify Agencies Verbally

Some notifications must be completed ***immediately*** upon discovering the discharge. It is important to immediately contact the Safety Officer so that timely notifications can be made. If the Safety Officer is not available, or the Safety Officer requests it, field personnel must designate one person to begin notification. Section 2 of this Plan describes the required notifications to government agencies.

2.4 Disposal Plan

The cleanup contractor will handle the disposal of any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemicals collected during a response to a discharge incident.

Any recovered product that can be recycled will be placed into the gun barrel tank to be separated and recycled. Any recovered product not deemed suitable for on-site recycling will be disposed of with the rest of the waste collected during the response efforts.

If the facility responds to a discharge without involvement of a cleanup contractor, Township will contract a licensed transportation/disposal company to dispose of waste according to regulatory requirements. The Safety Officer will characterize the waste and arrange for the use of certified waste containers.

All facility personnel handling hazardous wastes must have received both the initial 40-hour and annual 8-hour refresher training in the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) of the Occupational Health and Safety Administration (OSHA). This training is included as part of the initial training received by all field personnel. Training records and certificates are kept at the field office.

PART III SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PROVISIONS

40 CFR 112.7 and 112.9

3.1 Potential Discharge Volume and Direction of Flow [112.7(b)] and Containment [112.7(a)(3)(iii)]

REQUIRED FACILITY IMPROVEMENTS

CAPACITY (gallons)	PRODUCT (locations)	CONTROL MEASURES	REQUIRED FACILITY IMPROVEMENTS	SCHEDULE
4,000	Gasoline (Vehicle Fueling Area)	Double-walled tank on concrete pad. Visual leak detection High Level Alarm Emergency Shut-Off Spill Kit Concrete fueling area and pad	Monthly visual inspections for leaks/damage.	**TBD**
4,000	Diesel UST (Vehicle Fueling Area)	Concrete vehicle fueling area Spill kit Emergency Shut-Off	*NIA*	*NIA*

VECHILE FUELING AREAS & BULK OIL TRANSFER AREAS

CAPACITY (gallons)	PRODUCT (locations)	CONTROL MEASURES	REQUIRED FACILITY IMPROVEMENTS	SCHEDULE
4,000 Diesel UST & 4,000 Gasoline AST	Vehicle Fueling Area	None	Bulk deliveries: Pre-deployed containment berm along right side of main entrance for all deliveries to AST and UST Alternate: Trench drain system across main entrance threshold with gate valve	**TBD**

Woodbridge Township Department of Public Works
Vehicle and Equipment Fueling Practices

Woodbridge Twp. employees authorized to dispense fuel should comply with the following procedures to assist in the safe transfer of petroleum product into equipment or vehicles:

1. Verify container or vehicle is compatible to the fuel to be dispensed.

2. Vehicle or container to be positioned as close as possible to fuel pump.

3. Remove all ignition sources.

4. Fuel dispenser nozzle is to be placed as far as possible inside the vehicle or container fill port.

5. Inspect all nozzles, connections, and hoses for leakage or damage.

6. Attend dispenser at all times during product transfer.

7. Remove nozzle, hold upright, inspect for leaks, and return to dispenser.

8. In the event of an overflow, contain/remove spill immediately and notify your supervisor.

Required Practices for all Oil Deliveries and Waste Oil Removal

The Site supervisor or his designee will supervise deliveries from all oil suppliers and waste oil removal contractors.

Delivery actions and observations include:

1. Verify delivery truck contains type and quantity of oil ordered.

2. Transfer of product should take place during daylight hours in non-rain events if practical. Unlock fill port during on-hour deliveries.

3. Determine level and volume of fuel in tank to ensure tank can accept volume ordered.

4. Tank truck to be accompanied by trained operator and Woodbridge employee prior to unloading. Personnel shall verify correct fill port on tank is accessed and verify that spill response materials (absorbent pads, booms and absorbent material) are in adequate supply.

5. Fuel transfer containment device (where applicable) must be deployed and inspected to ensure it is in proper working condition before a fuel delivery occurs.

Nearby ignition sources within 50 feet of transfer area must be eliminated. No smoking is allowed in the vicinity of the tank or bulk delivery vehicle during the bulk transfer process

7. Tank truck brakes shall be set and the driver shall remain with the vehicle during the entire unloading period.

8. Inspect hose connections for drips/leakage. Spill pads should be used to capture product.

9. Ensure that the tank vent line is open and unobstructed.

10. Prior to filling (and again prior to departure of tank truck), the lowermost drain and all outlets of the tank truck shall be examined for leakage and, if necessary, tightened, adjusted, or replaced to prevent leakage during fuel transfer or while the vehicle is in transit.

11. Place collection bucket below tank truck unloading valve to ensure that any incipient leaks are captured.

12. When transfer is complete, examine hoses before disconnecting. The designated employee observing fuel transfer shall visually inspect the fuel transfer area for any releases. If any spill occurs during the fuel transfer process, the process shall immediately cease and spill reporting procedures shall be followed.

13. Gravity drains all hoses into the tank.

3.2 Containment and Diversionary Structures [112.7(c) and 112.7(a)(3)(iii)]

The facility is configured to minimize the likelihood of a discharge reaching navigable waters. The following measures are provided:

- Booms, sorbents, shovels, and other discharge response materials are stored in a shed located in close proximity to the loading area. This material is sufficient to contain small discharges (up to approximately 200 gallons).

These measures are described in more details in the following sections.

3.3 Inspections, Tests, and Records [112.7(e)]

This Plan outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Records of inspections performed as described in this Plan and signed by the appropriate supervisor are a part of this Plan, and are maintained with this Plan at the DPW field office for a minimum of three years. The reports include a description of the inspection

procedure, the date of inspection, whether drainage of accumulated rainwater was required, and the inspector's signature.

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). Each container is inspected monthly by field operation personnel as described in this Plan section and following the checklist provided in Appendix C of this SPCC Plan. The monthly inspection is aimed at identifying signs of deterioration and maintenance needs, including the foundation and support of each container. Any leak from tank seams, gaskets, rivets, and bolts is promptly corrected.

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

3.4. Daily Examinations

The facility is visited daily by field operations personnel. The daily visual examination consists of a walk through. Field operations personnel check for leaks and proper operation. Personnel inspect pumps to verify proper function and check for damage and leakage. They look for accumulation of water within the tank battery berms and verify the condition and position of valves. The storage tanks are gauged every day. A daily production report is maintained. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored soil, etc. are logged and communicated to the Superintendent of Operations.

3.4.1 Monthly Inspections

Table 3-4 summarizes the scope of monthly inspections performed by field personnel.

The monthly inspection covers all processing equipment. It also includes verifying the proper functioning of all detection devices, including high-level sensors on oil storage tanks, heater and separators. Storage tanks are inspected for signs of deterioration, leaks, or accumulation of oil inside the containment area, or other signs that maintenance or repairs are needed. The secondary containment area is checked for proper drainage, general conditions, evidence of oil, or signs of leakage. The monthly inspection also involves visually inspecting all aboveground valves and pipelines and noting the general condition of items such as transfer hoses, flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, pumping well pumping rod stuffing boxes, bleeder and gauge valves, locking of valves, and metal surfaces.

The checklist provided in Appendix B 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.

All safety devices are tested quarterly. The tests are recorded and the results are maintained with this Plan at Township's DPW office. Testing of the safety devices is conducted in accordance with guidelines API RP-14C published by the American Petroleum Institute, or in accordance with instructions from the device's manufacturer.

3.5 Personnel, Training, and Discharge Prevention Procedures [112.7(f)]

The Safety Officer has been designated as the point of contact for all oil discharge prevention and response at this facility.

All Township field personnel receive training on proper handling of oil products and procedures to respond to oil discharge prior to entering DPW facilities. The training ensures that all facility personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations. The training also covers risks associated with potential exposure to hydrogen sulfide (H_2S) gas. All Township field personnel also receive an initial 40-hour HAZWOPER training (and 8-hour annual refresher training) as per OSHA standard.

Woodbridge Township ensures that all contractor personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this Plan prior to working at the facility. All contractors working at the facility receive a copy of this SPCC Plan.
Township management holds briefings with field operations personnel (including contractor personnel as appropriate) at least once a year, as described below.

3.5.1 Spill Prevention Briefing

The Safety Officer conducts Spill Prevention Briefings annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the DPW safety meetings. Sign-in sheets, which include the topics of discussion at each meeting, are maintained with this Plan at DPW field office. A *Discharge Prevention Briefing Log* form is provided in Appendix E to this Plan and is used to document the briefings. The scheduled annual briefing includes a review of Township policies and procedures relating to spill prevention, control, cleanup, and reporting; procedures for routine handling of products (e.g., loading, unloading, transfers); SPCC inspections and spill prevention procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

The general outline of the briefings is as follows:

- Responsibilities of personnel and Designated Person Accountable for Spill prevention
- Spill prevention regulations and requirements;
- Spill prevention procedures;
- Spill reporting and cleanup procedures;
- History/cause of known spill events;
- Equipment failures and operational issues;
- Recently developed measures/procedures;
- Proper equipment operation and maintenance; and
- Procedures for draining rainwater.

3.5.2 Contractor Instructions

In order that there will be no misunderstanding on joint and respective duties and responsibilities to perform work in a safe manner, contractor personnel also receive instructions on the procedures outlined in this SPCC Plan. The instructions cover the contractor activities such as servicing a well or equipment associated with the well, such as pressure vessels.

All contractual agreements between Township and contractors specifically state:

> "Personnel must, at all times, act in a manner to preserve life and property, and prevent pollution of the environment by proper use of the facility's prevention and containment systems to prevent hydrocarbon and hazardous material spills. No pollutant, regardless of the volume, is to be disposed of onto the ground or water, or allowed to drain into the ground or water. Federal regulations impose substantial fines and/or imprisonment for willful pollution of navigable waters. Failure to report accidental pollution at this facility, or elsewhere, can be cause for equally severe penalties to be imposed by federal regulations. To this end, all personnel must comply with every requirement of this SPCC Plan, as well as taking necessary actions to preserve life, and property, and to prevent pollution of the environment. It is the contractor's (or subcontractor's) responsibility to maintain his equipment in good working order and in compliance with this SPCC Plan. The contractor (or subcontractor) is also responsible for the familiarity and compliance of his personnel with this SPCC Plan. Contractor and subcontractor personnel must secure permission from the Township's Safety Officer before commencing any work on any facility. They must immediately advise the Safety Officer of any hazardous or abnormal condition so that the Safety Officer can take corrective measures".

APPENDIX A: Facility Diagrams

APPENDIX B: Monthly Inspection Checklist

Further description and comments, if needed, should be provided on a separate sheet of paper and attached to this sheet. Any item answered "YES" needs to be promptly reported, repaired, or replaced, as it may result in non-compliance with regulatory requirements. Records are maintained with the SPCC Plan.

Date: _____ Signature: _____

	Yes	No	Description & Comments (Note tank/equipment ID)
Storage tanks and Separation Equipment			
Tank surfaces show signs of leakage			
Tanks show signs of damage, rust, or deterioration			
Bolts, rivets or seams are damaged			
Aboveground tank supports are deteriorated or buckled			
Aboveground tank foundations have eroded or settled			
Gaskets are leaking			
Level gauges or alarms are inoperative			
Vents are obstructed			
Thief hatch and vent valve does not seal air tight			
Containment berm shows discoloration or stains			
Berm is breached or eroded or has vegetation			
Berm drainage valves are open/broken			
Tank area clear of trash and vegetation			
Equipment protectors, labels, or signs are missing			
Related Equipment			
Valve seals or gaskets are leaking.			
Pipelines or supports are damaged or deteriorated.			
Buried pipelines are exposed.			
Transfer equipment			
Loading/unloading lines are damaged or deteriorated.			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Response Kit Inventory			
Discharge response material is missing or damaged or needs replacement			

Additional Remarks (attach sheet as needed):

APPENDIX C: Discharge Prevention Briefing Log

Date	**Type of Briefing**	**Instructor(s)**
	Scheduled refresher. All field personnel.	Mike Gelin
	Scheduled refresher. All field personnel.	Mike Gelin

APPENDIX D: Discharge Notification Procedures

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Joseph C. Grecus, Safety Officer, (732) 738-1311 (office) (732) 570-0147 (cell)
Local Emergency (fire, explosion, or other hazards) 911 (24 hours)

Agency / Organization	Agency Contact	Circumstances	When to Notify
Federal Agencies			
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	**Immediately (verbal)**
EPA Region II (Hotline)	1- 877-251-4575		**Immediately (verbal)**
EPA Region II Regional Administrator	290 Broadway New York, NY 10007-1866 Edison, NJ Environmental Center 2890 Woodbridge Ave. Edison, NJ 08837-3679	Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 2.1 of this Plan)
State Agencies			
Office of State Police, Transportation and Environmental Safety Section, Hazardous Materials Hotline	609-882-2000	1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	**Immediately (verbal)** Written notification to be made within 5 days.
Office of State Police, Transportation and Environmental Safety Section, Hazardous Materials Hotline	609-882-2000	Discharges that pose emergency conditions, regardless of the volume discharged.	**Within 1 hour** of discovery (verbal). Written notification within 7 working days.

Agency / Organization	Agency Contact	Circumstances	When to Notify
New Jersey Department of Environmental Protection, Office of Compliance and Enforcement	24-Hour Hotline 1-877-927-6337	Discharges that do not pose emergency conditions.	Within 24 hours of discovery (verbal). Written notification within 7 working days.
NJDEP Spill Hotline	1-877-WARNDEP	Any discharge of 100 lbs or more that occur beyond the boundaries of the facility, including to the air.	**Immediately (verbal)** Written notification within 7 days.
Others			
Response/cleanup contractors	Allstate Power Vac Rahway, NJ 07065 Tel (732) 815-0220 Tel (800) 876-9699 Associated Spill Management Wayne, NJ 07470 Tel (973) 831-9061 All State Oil Recovery Co West Milford, NJ 07480 Tel (973) 283-9550 Tel (800) 300-3122 Emergency spill response, clean up, hazardous waste transporters. Aim Tank Services Wayne, NJ 07470 Tel (973) 633-5275 Tel (800) 722-1940	Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As needed

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the owner/operator;
- Date and time of the incident;
- Location of the incident;
- Source and cause of discharge;
- Types of material(s) discharged;
- Total quantity of materials discharged;
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines);
- Danger or threat posed by the release or discharge;
- Description of all affected media (e.g., water, soil);
- Number and types of injuries (if any) and damaged caused;
- Weather conditions;
- Actions used to stop, remove, and mitigate effects of the discharge;
- Whether an evacuation is needed;
- Name of individuals and/or organizations contacted; and
- Any other information that may help emergency personnel responds to the incident.

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner or operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

APPENDIX E: Discharge Notification Form

*** Notification must not be delayed if information or individuals are not available.

Facility: Woodbridge Township, Department of Public Works
225 Smith Street, Keasbey, New Jersey 08832

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name: Tel. #:	
Location of discharge	Latitude: Longitude:	Description:
Equipment source	G piping G flowline G well G unknown G stock, flare	Description: Equipment ID:
Product	G crude oil G saltwater G other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity	Released:	Recovered:
Receiving medium	G water** G land G other (describe):	G Release confined to company property. G Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		

Safety issues	G Injuries G Fatalities G Evacuation	
Notifications		
Agency	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Parish Emergency Response Commission		
oil spill removal organization/cleanup contractor		

APPENDIX F: Equipment Shut-off Procedures

Source	Action
Manifold, transfer pumps or hose failure	Shut in the well supplying oil to the tank battery if appropriate. Immediately close the header/manifold or appropriate valve(s). Shut off transfer pumps.
Tank overflow	Shut in the well supplying oil to the tank battery. Close header/manifold or appropriate valve(s)
Tank failure	Shut in the well supplying oil to the tank battery. Close inlet valve to the storage tanks.
Flowline rupture	Shut in the well supplying oil to the flowline. Close nearest valve to the rupture site to top the flow of oil.
Flowline leak	Shut in the well supplying oil to the flowline. Immediately close the nearest valve to stop the flow of oil to the leaking section.
Explosion or fire	Immediately evacuate personnel from the area until the danger is over. Immediately shut in both wells if safe to do so. If possible, close all manifold valves. If the fire is small enough such that it is safe to do so, attempt to extinguish with fire extinguishers available on site.
Equipment failure	Immediately close the nearest valve to stop the flow of oil into the leaking area.

APPENDIX G: Written Commitment of Manpower, Equipment and Materials

In addition to implementing the preventive measures described in this Plan, Township will also specifically:

In the event of a discharge:

- Make available all trained field personnel (three employees) to perform response actions
- Obtain assistance from an additional three full-time employees from its main operations contractor (Avonlea Services)
- Collaborate fully with local, state, and federal authorities on response and cleanup operations
- Maintain all on-site oil spill control equipment described in this Plan and in the attached Oil Spill Contingency Plan. The equipment is estimated to contain oil spills of up to 500 gallons.
- Maintain all communications equipment in operating condition at all times.
- Ensure that staging areas to be used in the event of a discharge to Big Bear Creek are accessible by field vehicles.
- Review the adequacy of on-site and third-party response capacity with pre-established response/cleanup contractors on an annual basis and update response/cleanup contractor list as necessary.
- Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup (see contract agreements maintained separately at the Ridgeview field office and lists of associated equipment and response contractor personnel capabilities).

Authorized Facility Representative:	Joseph C. Gregus, CPSI
Signature:	Joseph Gregus
Title:	Safety Officer

APPENDIX H: Oil Spill Contingency Plan

The oil spill contingency plan is maintained separately at the Ridgeview field office.

[Refer to the sample Contingency Plan also available from EPA for more information on the content and format of that Plan]