

**Spill Prevention, Control, and Countermeasure Plan
George Washington Memorial Parkway
Parkway Maintenance Facility**

Effective Date: April 2014

Revised April 2018

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MANAGEMENT APPROVAL

The management at George Washington Memorial Parkway is committed to the prevention of discharges of oil to navigable waters and the environment, and maintaining the highest standards for spill prevention, control, and countermeasure implementation through regular review and updates of this Plan. Management and staff will commit adequate resources to carry out all provisions of this Plan.

Approved By:

Alexcy Romero
Superintendent, George Washington Memorial Parkway

Date

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PROFESSIONAL ENGINEER CERTIFICATION

A licensed Professional Engineer (PE) must review and certify this Plan for it to be effective. Certification by the PE in no way relieves the owner or operator of the duty to prepare and fully implement this Plan in accordance with the requirements of Section 311 of the Clean Water Act and 40 CFR Part 112.

By means of this certification, the undersigned Registered PE attests:

- The PE is familiar with the requirements of 40 CFR Part 112;
- The PE or PE's agent has visited and examined the facility;
- The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112;
- The Plan establishes procedures for required inspections and testing; and
- This SPCC Plan is adequate for the facility.

Christopher J. Jimieson
Name

E38408
Registration Number

Christopher J. Jimieson
Signature

Wisconsin
Issuing State

April 21, 2014
Date



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PURPOSE AND SCOPE

Section 311 of the Clean Water Act authorized publication of the Code of Federal Regulations, Title 40, Part 112 (40 CFR Part 112), which requires facilities with an aggregate aboveground oil storage capacity of greater than 1,320 gallons to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan. The National Park Service (NPS) George Washington Memorial Parkway (park), Parkway Maintenance Facility (facility):

- Is a non-transportation facility engaging in the use, storage, and consumption of oil and oil products;
- Has an aggregate aboveground storage capacity greater than 1,320 gallons; and
- Is situated such that a spill at the facility could reasonably be expected to discharge into or upon navigable waters, including the small drainage areas and tributaries leading to the Potomac River.

Therefore, the facility is required to prepare and implement an SPCC Plan.

The facility is a Tier I qualified facility since:

- All individual aboveground oil storage containers have a capacity less than 5,000 gallons;
- The facility has not had a single discharge exceeding 1,000 gallons or two discharges each exceeding 42 gallons within any 12-month period within the three years prior to the SPCC Plan certification date; and
- The facility's aggregate aboveground oil storage capacity is less than 10,000 gallons.

Per 40 CFR § 112.6(a)(1), the facility has opted to prepare and implement an SPCC Plan meeting the general requirements in 40 CFR § 112.7 and applicable requirements in 40 CFR subparts B and C, including having the SPCC Plan certified by a Professional Engineer as required under 40 CFR § 112.3(d).

The facility is not required to prepare and submit a Facility Response Plan since the facility's operations are not reasonably expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines (See *Appendix B: Certification of Applicability of Substantial Harm Criteria*).

This SPCC Plan establishes procedures and methods and identifies equipment and other requirements to prevent the discharge of oil and oil products from the facility into or upon the navigable waters of the United States or adjoining shorelines. The purpose of the SPCC Plan is to form a comprehensive federal and state spill prevention program to minimize the potential for discharges. The Plan addresses all relevant regulatory spill prevention, control, and countermeasures necessary at the facility.

In relevant sections, this Plan discusses Virginia laws, regulations, and guidelines that are more stringent than the federal requirements. Where the Plan discusses Virginia requirements, the Plan provides the relevant citation. This Plan covers the following Virginia requirements:

- Article 11 of State Water Control Law (Code of Virginia, §§ 62.1-44.34:14 through 23); and

- Facility and Aboveground Storage Tank (AST) Regulation, 9 Virginia Administrative Code (VAC) 25-91-10 *et seq.*
 - Note: Due to the facility's largest aboveground storage tank capacity of 1,000 gallons and the facility's total aboveground storage capacity of 2,025 gallons, only the provisions of Part II (9 VAC 25-91-100 *et seq.*, Registration, Notification and Closure Requirements) are applicable.

In addition, under NPS Director's Orders 50 and 58, the NPS adopted the National Fire Protection Association (NFPA) codes. Specific NFPA codes applicable to the facility are found mostly in NFPA 30, *Flammable and Combustible Liquids Code*, and NFPA 30A, *Code for Motor Fuel Dispensing Facilities and Repair Garages*. Key NFPA aboveground storage tank requirements pertaining to the facility include:

- Reconciling inventory and fuel use for aboveground storage tanks;
- Providing corrosion protection for piping touching the ground;
- Protecting aboveground storage tanks from tampering or trespassing;
- Ensuring that a method is used to determine the liquid level in an aboveground storage tank prior to filling it with fuel;
- Providing an overfill alarm and automatic shutoff device on aboveground storage tanks to prevent spills during the fueling process;
- Installing emergency breakaway devices for hoses dispensing Class I and II liquids (e.g., gasoline and diesel); and
- Placing an emergency shutoff switch so that it is clearly identifiable and accessible.

This Plan has been prepared in accordance with good engineering practices. The Plan has the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan.

This Plan is organized so as to be readily usable in an emergency. In some cases, this Plan diverges from the sequence of 40 CFR Part 112. Refer to *Appendix A: Cross Reference Chart*, which provides a cross reference showing the location of each section of 40 CFR Part 112 within this Plan.

PROCEDURES

1. Facility Information

This section of the Plan describes the physical layout of the facility and provides facility diagrams.

Facility Information	
Name	Parkway Maintenance Facility
Address	2700 George Washington Memorial Parkway
City	Arlington
State	Virginia
Zip Code	22202
County	Arlington
Telephone Number	(703) 419-6412
Latitude	38° 50'51.32"N
Longitude	77° 2'57.49"W
Owner/Operator Information	
Name	National Park Service George Washington Memorial Parkway Headquarters
Address	700 George Washington Memorial Parkway
City	McLean
State	Virginia
Zip Code	22101
County	Fairfax
Telephone Number	(703) 289-2500
Contact Name	Alex Romero
Contact Title	Superintendent
Contact Telephone Number	(703) 289-2511

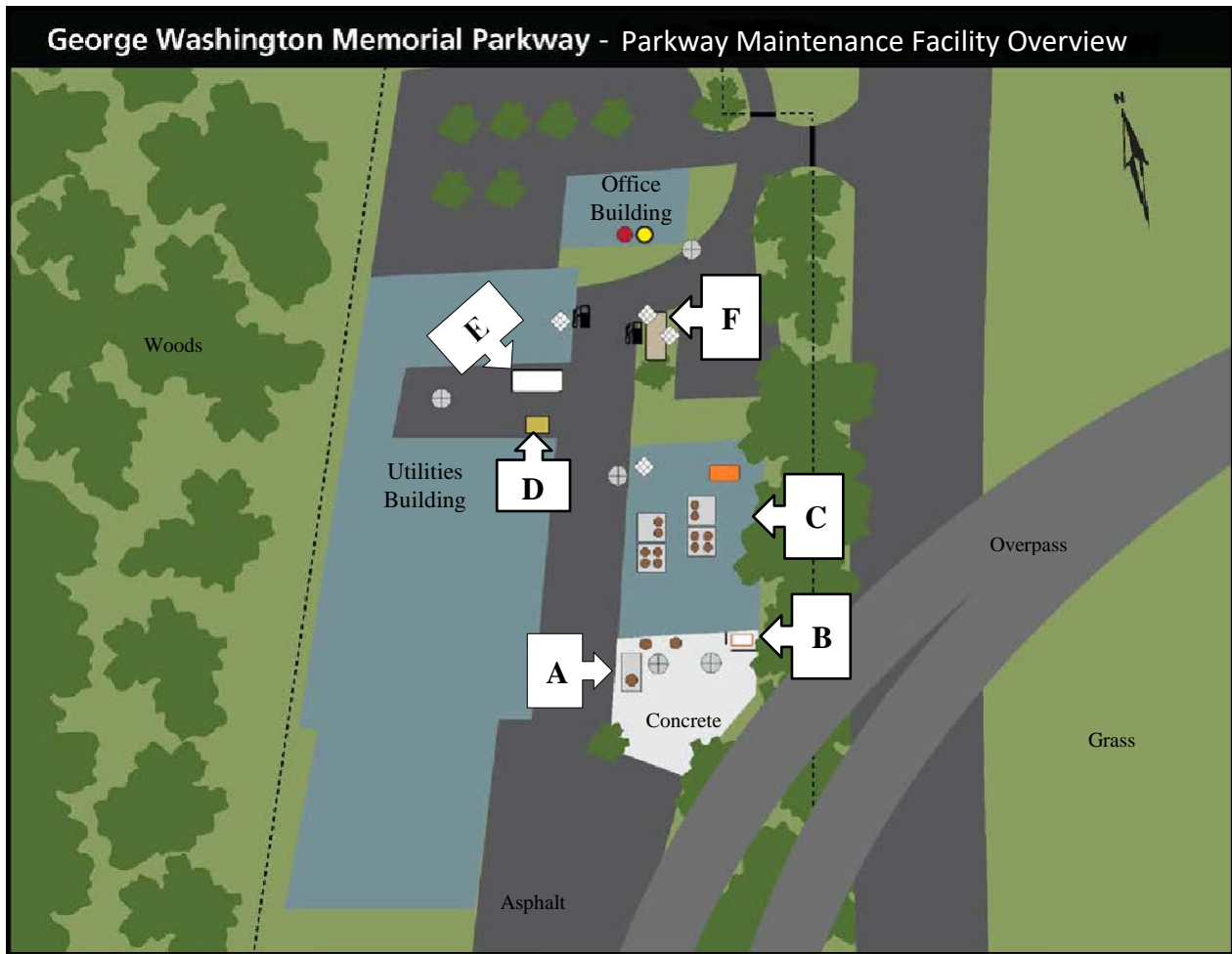
The facility is an NPS-owned maintenance operations center for the George Washington Memorial Parkway. The facility stores horticultural and building materials as well as equipment. The facility also services landscaping and roadway maintenance equipment as well as vehicles necessary for the upkeep of other parkway facilities. The storage and use of oil at the facility is primarily for the maintenance and fueling of NPS equipment and vehicles.

The facility is located in Arlington, Arlington County, Virginia. The George Washington Memorial Parkway and the Ronald Reagan Washington National Airport border the facility to the west. Rail lines and commercial development border the facility to the east. The George Washington Memorial Parkway's undeveloped land borders the facility to the north and south.

The facility covers nine acres and consists of ten building assets. A continuous chain link fence surrounds the facility, with two access gates on the northwest portion of the facility. The facility includes a maintenance headquarters building, an automotive and equipment maintenance garage, two fueling stations, a horticultural and grounds building, and a salt/sand storage building.

1.1 Facility Diagram

The facility diagram below shows the locations of all fixed storage containers, portable container storage areas, and fueling stations. The table in *1.2 Oil Product Storage Containers and Secondary Containment* summarizes the contents (i.e., type of oil product) and oil storage capacities for the containers in the following diagram. A discharge flow diagram is available in *1.3 Discharge Flow*.



Key			
	Used Oil Aboveground Storage Tank		Drain
	55-Gallon Drum		Alarm
	Transportation Mobile Refueler		Emergency Shutoff Device
	Inactive Emergency Generator with Base Tank		Fueling Station
	Gasoline Underground Storage Tank		Fencing
	Diesel Underground Storage Tank		Gate
	Spill Kit		

1.2 Oil Product Storage Containers and Secondary Containment

This section of the Plan describes the location, contents, and secondary containment of all oil storage containers and storage areas.

Diagram Label	Oil Storage Container/Area	Use	Contents	Capacity (Gallons)	Construction Material	Ground Material	Secondary Containment (Gallons)
Aboveground Storage Containers							
A	Used oil storage area, south of the automotive and equipment maintenance garage (Three 55-gallon drums)	Collection	Used oil	165	Steel	Concrete	Active containment measures described in <i>3. Spill Control</i>
B	Aboveground storage tank, south of the automotive and equipment maintenance garage	Collection	Used oil	1,000	Steel	Concrete	Double-walled tank
C	Automotive and equipment maintenance garage oil storage area	Equipment maintenance	Hydraulic & motor oil (10)	550	Steel	Secondary containment pallet	(4) 83-gallon Drum Poly-Spillpallet™ 6000 (ability to hold four drums each)
	(Twelve 55-gallon drums &	Collection	Used oil (2)	110	Steel		Active containment measures described in

Diagram Label	Oil Storage Container/Area	Use	Contents	Capacity (Gallons)	Construction Material	Ground Material	Secondary Containment (Gallons)
	transportation mobile refueler ¹⁾	Storage	Diesel	200	Steel		3. <i>Spill Control</i>
D	Inactive: emergency generator with base tank, ²⁾ outside to the north of the utilities building	Inactive	Empty	500	Steel	Asphalt	Not Applicable
Underground Storage Containers							
E	Completely buried underground storage tank, ³⁾ outside to the south of the maintenance headquarters building and to the north of the utilities building	Vehicle Fueling	Gasoline	20,000	Not applicable	Not applicable	Not applicable
F	Completely buried	Vehicle	Diesel	20,000	Not applicable	Not	Not applicable

¹⁾ This mobile refueler is used to store and transport fuel to grounds equipment outside the facility. Thus, this mobile refueler is transportation-related and thus, subject to Department of Transportation regulation. However, since the mobile refueler is filled and stored within the facility when not in use, this mobile refueler is also subject to the requirements under this SPCC Plan when operated in a non-transportation mode. See *SPCC Guidance*, Chapter 2: SPCC Rule Applicability § 2.5.1 (2013), available at http://www.epa.gov/oem/docs/oil/spcc/guidance/2_Applicability.pdf.

²⁾ This emergency generator was delivered from the manufacturer, has never been set up, and has never stored oil. Therefore, the emergency generator is not subject to SPCC requirements, nor is its capacity counted toward the facility's capacity until it is used to store oil. See *SPCC Guidance*, Chapter 2: SPCC Rule Applicability § 2.8.1 (2013), available at http://www.epa.gov/oem/docs/oil/spcc/guidance/2_Applicability.pdf.

³⁾ 40 CFR § 112.1(d)(4) exempts from SPCC requirements completely buried storage tanks, connected underground piping, underground ancillary equipment, and containment systems that are subject to the technical requirements of Underground Storage Tank regulations. See U.S. Environmental Protection Agency, Office of Emergency Management, *SPCC Guidance for Regional Inspectors* (2013) [hereinafter *SPCC Guidance*], Chapter 2: SPCC Rule Applicability § 2.8.3, available at http://www.epa.gov/oem/docs/oil/spcc/guidance/2_Applicability.pdf.

Diagram Label	Oil Storage Container/Area	Use	Contents	Capacity (Gallons)	Construction Material	Ground Material	Secondary Containment (Gallons)
	underground storage tank, ⁴ outside to the south of the maintenance headquarters building	Fueling				applicable	
Total active aboveground storage capacity (gallons)				2,025			
Maximum aboveground storage capacity (gallons)				2,525			
Total underground storage capacity (gallons)				40,000			

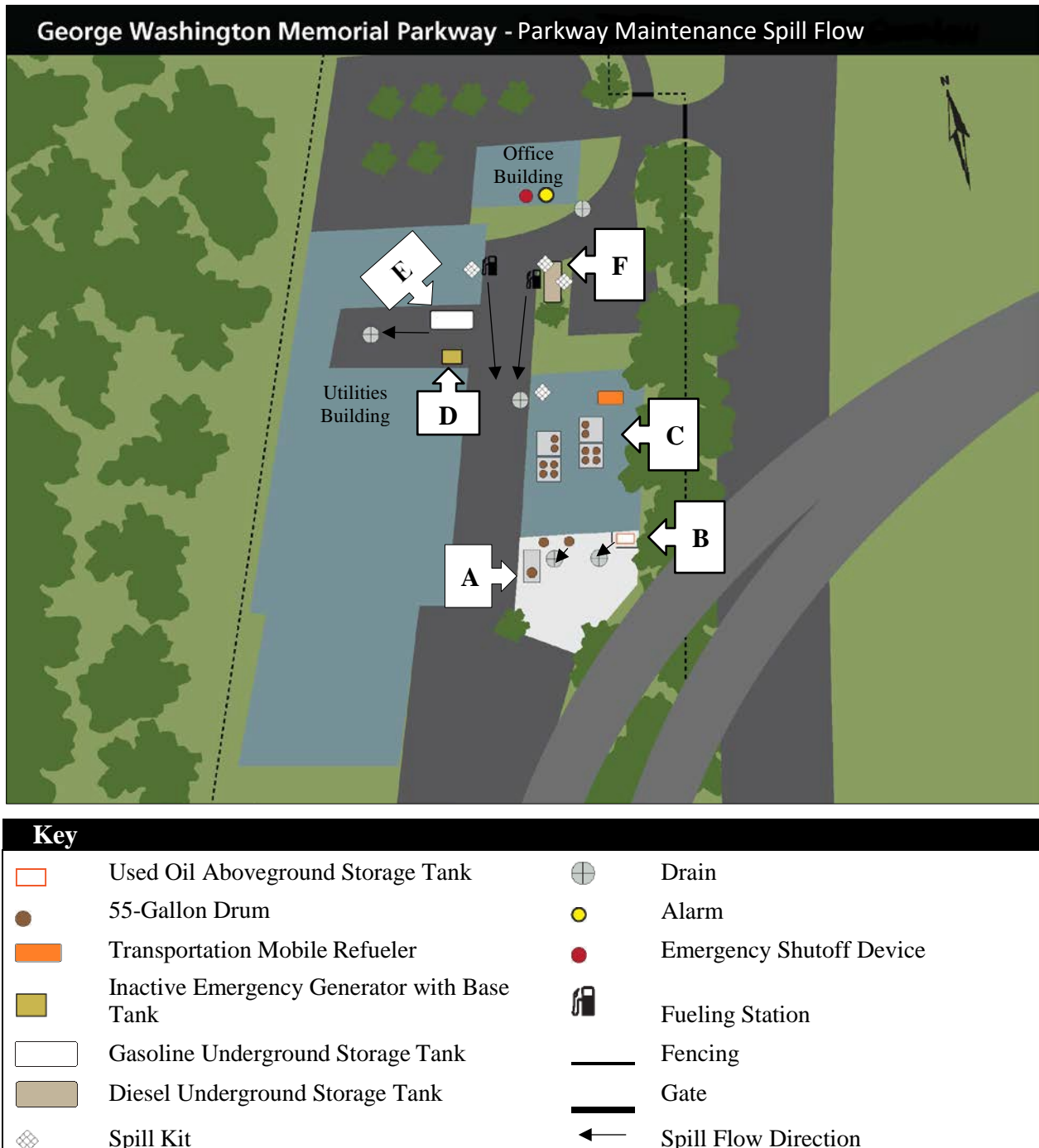
* The number of drums may vary based on operations, but will not exceed these numbers.

As provided in 40 CFR § 112.1(d)(5), 40 CFR Part 112 does not apply to any container with a storage capacity of less than 55 gallons.

⁴ See previous footnote.

1.3 Discharge Flow

This section of the Plan describes the potential oil flow direction and quantity as a result of a catastrophic equipment or container failure.



Within the facility, the topography is relatively flat with a natural mild southerly slope. The facility houses a stormwater drainage system that directs runoff away from buildings and roads. The stormwater drainage system collects stormwater into underground piping that drains to the

southern edge of the facility onto NPS land. An oil spill in an outside area would follow this graded stormwater drainage system, resulting in oil depositing and infiltrating surface soils on undeveloped, wooded NPS land. Any non-infiltrating oil would follow the natural topography, flowing southward over NPS land toward the Four Mile Run waterway, which drains into the Potomac River. The Four Mile Run waterway is located approximately 0.36 miles from the facility.

The worst case spill in the facility would result from a catastrophic failure of the used oil aboveground storage tank (diagram label B) and could potentially result in a spill of 1,000 gallons of used oil completely uncontained by the double-walled tank and the nearby spill kits. The flow of this spill would slope toward the facility’s drainage system, resulting in oil following the route described above.

1.4 Contact List

This section of the Plan provides contact information for all personnel with a role in this Plan’s implementation.

Role	Name	Title	Phone Number
SPCC Coordinator <i>Designated person accountable for discharge prevention and spill response coordination</i>	Anthony Migliaccio	Chief of Maintenance	Desk: (703) 419-6402 Mobile: (202) 438-6621
Alternative SPCC Coordinator	Richard Howes	Designated Tank Operator	Desk: 703-419-6416
Emergency Response Coordinator (ERC) <i>Designated person responsible for initial implementation of emergency response procedures.</i>	Ruben Rodriguez	Health and Safety Officer	Desk: (703) 289-2504 Mobile: (540) 841-0825
Alternative ERC	Jeffrey Hitchcock	Deputy Chief of MT	Desk: (703) 419-6401
Second Alternative ERC	Brenda Wasler	Environmental Protection Specialist	Desk: (703) 289-2540 (571)-289-6459
Oil Vendors	Petroleum Traders	Gasoline Vendors	(800) 348-3705
	Holtzman	Diesel Vendors	(800) 628-0379
	Metal Pro	Used Oil Vender	(703) 451-8300
Cleanup Contractors	CHEMTREC		(800) 424-9300
NPS personnel and offices to	Alex Romero	Park Superintendent	(703) 289-2511

Role	Name	Title	Phone Number
notify in case of a spill (follow procedures in <i>5.1 Internal Discharge Notification</i>)	NPS National Emergency Incident Coordination Center		(888) 246-4335
	David Birney	National Capital Region (NCR) Environmental Protection Specialist	(202) 619-7458 (202)-731-0576
	David Anderson	Washington Area Support Office (WASO) Spill Response Coordinator	Desk: (970) 225-3239 Mobile: (204) 205-3202
Agencies to notify in case of a spill (notifications vary depending on spill quantity and details; see <i>5. Discharge Notification</i>)	National Response Center		Toll Free: (800) 424-8802 Local: (202) 267-2675
	Environmental Protection Agency (EPA) Region 3		Toll Free: (800) 438-2474 Local: (215) 814-5000
	Virginia Department of Environmental Quality (DEQ), Northern Virginia Regional Office		(703) 583-3800
	Virginia Department of Emergency Management		(800) 468-8892
	Arlington Fire Department		Emergency: 911 Non-emergency: (703) 228-0105

2. Spill Prevention

This section of the Plan describes spill prevention measures including procedures for routine handling of products during loading, unloading, and facility transfers.

2.1 Containers

This Plan is organized so as to be readily usable in an emergency. Therefore, this Plan describes onsite oil storage containers in *1.2 Oil Product Storage Containers and Secondary Containment* that are shown on the map in *1.1 Facility Diagram*.

The facility stores oil only in compatible containers. Compatibility includes material, construction, and conditions of storage such as pressure and temperature. The facility maintains containers in accordance with good engineering practices.

The facility evaluates each container for risk of a spill, leak, or failure whenever the container undergoes a repair, alteration, reconstruction, or a change in service that could potentially affect the risk of a spill, leak, or failure. The facility reevaluates containers in the event that a spill, leak, or failure occurs. The facility takes appropriate action to address discovered problems.

Facility personnel report any leaks or spills to the SPCC Coordinator and the ERC listed in *1.4 Contact List*. The facility promptly corrects visible leaks from containers, seams, gaskets, piping, pumps, valves, rivets, bolts, and any other associated fuel storage elements.

The facility registers itself and all aboveground storage tanks with a capacity of greater than 660 gallons of oil in accordance with 9 VAC 25-91-100(A).⁵ The SPCC Coordinator maintains a copy of all facility and aboveground storage tank registrations with the SPCC Plan. The SPCC Coordinator renews all facility and aboveground storage tank registrations every five years in accordance with 9 VAC 25-91-100(F).

If the facility upgrades, makes major repairs to, replaces, or changes service for a registered aboveground storage tank, the facility submits a notification within 30 days to the DEQ.

Traffic bollards protect the fueling stations associated with the underground storage tanks (diagram labels E and F) from vehicular traffic. Concrete barriers protect the used oil aboveground storage tank (diagram label B) from vehicular traffic. The drums and mobile refueler inside the automotive and maintenance oil storage area (diagram label C) are protected from vehicular traffic by their location within the automotive and maintenance building.

2.2 Overfill Prevention

The facility maintains each container with a system or documented procedure to prevent overfills. A person must be present to monitor the liquid-level sight gauge for the used oil aboveground storage tank (diagram label B).

⁵ The facility uses Form 7540A for Aboveground Storage Tank (AST) Registration, which is available at www.deq.virginia.gov/Portals/0/DEQ/Land/Tanks/7540Aweb.doc or www.deq.virginia.gov/Portals/0/DEQ/Land/Tanks/7540A.doc.

Diagram Label	Oil Storage Container/Area	Overfill Prevention
A	Used oil storage area	Personnel transport used oil into drums manually, limiting potential volume of overfill. Personnel monitor each transfer to avoid spills and overfill.
B	Aboveground used oil storage tank	Tank equipped with liquid-level sight gauge. Personnel monitor each transfer of used oil.
C	Used oil drums in automotive and equipment maintenance garage storage area	Personnel transport used oil into drums manually, limiting potential volume of overfill. Personnel monitor each transfer to avoid spills and overfill.
	Hydraulic and motor oil drums in automotive and equipment maintenance garage storage area	Not applicable: drums are only emptied, not filled.
	Diesel transportation mobile refueler in automotive and equipment maintenance garage storage area	Personnel transfer diesel fuel into tank, monitoring each transfer and limiting potential spills and overfill.
D	Inactive: emergency generator	Not applicable: generator base tank has never been used to store fuel.
E	Underground gasoline storage tank	Not applicable. Automatic tank gauge and alarm. Personnel monitor each transfer.
F	Underground diesel storage tank	Not applicable. Automatic tank gauge and alarm. Personnel monitor each transfer.

2.3 Routine Handling of Oil Products

This section describes procedures for routinely handling oil so as to prevent spills, including loading, unloading, and transfers operations. The following table summarizes loading, unloading, and transfer operations within the facility.

Diagram Label	Oil Storage Container/Area	Loading/Delivery	Unloading/Removal
A	Used oil storage area	Portable container	Suction-pumped into the Tank B, or empty portable containers removed by vendors
B	Aboveground used oil storage tank	Portable container	Contents pumped out by contracted tanker truck

Diagram Label	Oil Storage Container/Area	Loading/Delivery	Unloading/Removal
C	Motor and hydraulic drums inside the automotive and equipment maintenance garage	Drums delivered by contractor	Empty portable containers removed by vendors
	Used oil drums inside the automotive and equipment maintenance garage	Portable container	Suction-pumped into Tank B, or empty portable containers removed by vendors
	Mobile refueler inside the automotive and equipment maintenance garage	Fueled from tank F	Fueling park equipment
D	Inactive: emergency generator with base tank	Not applicable: generator base tank has never been used to store oil	
E, F	Diesel and gasoline underground storage tanks	Contracted tanker truck	Fueling

Routine handling of oil sometimes results in small, incidental spills easily cleaned up by personnel.⁶ Facility personnel, delivery drivers, and waste haulers report any spills and visible leaks to the SPCC Coordinator and the ERC listed in *1.4 Contact List*. The SPCC Coordinator and the ERC ensures immediate cleanup of all small, incidental spills, overfills, and visible leaks occurring during oil delivery, removal, or internal transfer operations to prevent migration into surrounding soils, groundwater, and navigable waterways.

2.3.1 Oil Delivery

Facility personnel ensure oil deliveries are conducted so as to prevent spills and overflow. Contracted fuel delivery services deliver oil products from a tanker truck to the diesel and gasoline underground storage tanks (diagram labels E and F). The facility requires contracted delivery services to develop and adhere to their own handling and emergency procedures, which are consistent with this Plan (See *Appendix G: Notice to Oil Vendors*).

Facility personnel notify the SPCC Coordinator of all scheduled deliveries to the underground storage tanks at least one day in advance of the delivery; information provided to the SPCC Coordinator includes the date, approximate time, and tanks to be serviced. Facility personnel must:

⁶ By appropriately responding to small spills and visible leaks, the facility reduces the risk of large spills. Many small spills or leaks could have been a large spill under slightly different circumstances. The key to reducing the risk of large spills is to investigate small spills and leaks, identify the cause, consider what could have happened, and correct deficiencies including the processes, procedures, operating conditions, and training that contributed to the spill or leak.

- Complete the *Appendix C: Fuel Delivery Checklist* for all bulk fuel deliveries;
- Ensure spill kits are available;
- Monitor all bulk fuel deliveries throughout the entire unloading operation;
- Check the liquid level in the underground storage tanks prior to beginning the filling process to ensure the volume available in the tank is greater than the volume of product to be transferred to the tank;
- Inspect storage tank's fill pipe to ensure there is no blockage, cracking, or leaking before connecting hose;
- Report to the SPCC Coordinator and the ERC any occurrences of leaks or spills during transfer; and
- Inform the SPCC Coordinator of any maintenance that, if left undone, could result in a leak or spill.

In addition, facility personnel monitor all bulk fuel deliveries to ensure fuel delivery drivers adhere to the following delivery procedures.

- Exercise caution when maneuvering vehicles to avoid damage to containers, piping, secondary containment structures, and all other related equipment.
- To the extent possible, park the truck in a location that minimizes the potential for release to navigable waterways. This may include, but is not be limited to, parking away from storm drains or catch basins or parking in locations that are not up gradient of a drainage or waterway, or by plugging or covering drains and basins.
- Remain with the vehicle as long as the truck is unloading fuel.
- Chock truck wheels to prevent an accidental drive-off.
- Check all truck outlets and valves for signs of leakage before and after unloading.
- Ensure security of all connections prior to fueling.
- Ensure all liquid is out of the hose prior to disconnecting.
- Disconnect hoses and secure them to the vehicle prior to departing.

Motor and lubricant oil products are delivered to the facility. Facility personnel must:

- Accept oil only in compatible portable containers in good condition;
- Visually inspect drums for signs of leakage or deterioration;
- Use appropriate equipment to move drums to prevent injury or mishandling;
- Ensure drum lids are tightly sealed;
- Ensure product label is intact and legible;
- Report to the SPCC Coordinator and the ERC any occurrences of leaks or spills during transfer; and
- Inform the SPCC Coordinator of any maintenance that, if left undone, could result in a leak or spill.

In addition, facility personnel monitor motor and lubricant oil product deliveries to ensure the following procedures are followed:

- Exercise caution when maneuvering vehicles to avoid damage to the aboveground storage tanks, piping, secondary containment structures, and all other related equipment.

- Chock truck wheels to prevent an accidental drive-off.
- Deliver oil only in compatible portable containers in good condition.
- Use appropriate equipment to move drums to prevent injury or mishandling.
- Ensure drum lids are tightly sealed.
- Visually inspect drums for signs of leakage or deterioration.
- Ensure product label is intact and legible.

2.3.2 Fueling

Facility personnel ensure vehicle fueling is conducted so as to prevent spills. NPS vehicles draw fuel from the underground storage tanks (diagram labels E and F) via the fueling station. Facility personnel monitor all fueling operations and adhere to the following fueling procedures.

- Exercise caution when maneuvering vehicles to avoid damage to the aboveground storage tanks, piping, secondary containment structures, and all other related equipment.
- Visually inspect vehicle for signs of leakage prior to fueling.
- Check the liquid level in vehicle tanks prior to fueling.
- Ensure security of all connections prior to fueling.
- Remain at the fuel pump and monitor fueling throughout the entire operation.
- Check for signs of leakage prior to departing, and report any leaks or spills to the SPCC Coordinator and the ERC.

2.3.3 Used Oil Product Removal

Facility personnel ensure used oil removal is conducted so as to prevent spills. Certified contracted waste haulers remove used oil from the aboveground storage tank (diagram label B) via a tanker truck. The facility requires contracted waste haulers to develop and adhere to their own handling and emergency procedures, which are consistent with this Plan. Facility oil-handling personnel monitor all used-oil removal operations to ensure waste haulers adhere to the following delivery procedures.

- Exercise caution when maneuvering vehicles to avoid damage to containers, piping, secondary containment structures, and all other related equipment.
- To the extent possible, park the truck in a location that minimizes the potential for release to navigable waterways. This may include, but is not be limited to, parking away from storm drains or catch basins or parking in locations that are not up gradient of a drainage or waterway, or by plugging or covering drains and basins.
- Remain with the vehicle as long as the truck is loading the used oil.
- Chock truck wheels to prevent an accidental drive-off.
- Check all truck outlets and valves for signs of leakage before and after loading.
- Ensure security of all connections prior to fueling.
- Ensure all liquid is out of the hose prior to disconnecting.
- Disconnect hoses and secure them to the vehicle prior to departing.

The facility ensures hazardous waste manifesting is completed as appropriate.

2.3.4 Internal Oil Transfers

Internal oil product transfer operations include transfers of used oil from equipment to used oil drums at the automotive and equipment maintenance garage, transfers of used oil from drums to the used oil aboveground storage tank, and transfer of hydraulic and motor oil and diesel from storage drums to equipment throughout the facility. Oil-handling personnel conduct internal oil product transfers so as to prevent spills. Personnel move oil products and used oil around the facility using portable containers. Facility personnel adhere to the following internal oil product transfer procedures.

- Use only compatible portable containers in good condition with proper grounding.
- Label portable oil product containers.
- Use appropriate equipment to move drums to prevent injury or mishandling.
- Note the location of the nearest spill kit prior to transferring oil products.
- Visually inspect equipment or tank for signs of leakage or spills prior to transferring oil products.
- Check the liquid level in equipment prior to transferring oil products into the equipment.
- Inspect fill pipe of equipment for blockage, cracking, or leaking prior to transferring oil products.
- Monitor the entire transfer operation.
- Visually inspect for signs of leakage or spills after transferring oil products into the equipment.
- Report any leaks or spills to the SPCC Coordinator and the ERC.

2.4 Inspections

The facility conducts and documents inspections of all containers and equipment listed in *1.2 Oil Product Storage Containers and Secondary Containment* against the criteria, and according to the schedule, outlined in this section. Inspection criteria and schedules outlined in this Plan take into account container size, configuration, and design and are based on the following accepted industry standards:

- American Petroleum Institute (API) 653, *Tank Inspection, Repair, Alteration and Reconstruction* (2008, 3rd ed.); and
- Steel Tank Institute (STI) SP-001, *Standard for the Inspection of Aboveground Storage Tanks* (2011, 5th ed.).

The facility undertakes corrective action and additional examination to address problems identified during inspections.

2.4.1 Monthly Inspections

The facility conducts and documents monthly visual inspections of all containers and equipment using the monthly checklist in *Appendix D: SPCC Facility Inspection Log*. These monthly inspections do not require a Certified Inspector, but are completed by someone familiar with the facility, tanks, containers, liquids stored, pumps, pipes, and valves, and who can identify changes and developing problems. Inspections include examining:

- Tanks and containers for signs of corrosion or damage to piping and valves;
- Tank supports and secondary containment for damage or irregularity;
- Storage areas for signs of debris that may block access;
- Storage areas for unlabeled or outdated containers;
- Tanks, containers, associated piping, and surrounding areas for evidence of leakage or spillage;
- Tank and container interstitial space or secondary containment for water or oil; and
- Spill kits for replacement or replenishment of spill response materials.

The SPCC Coordinator maintains and keeps documentation of inspections with the SPCC Plan for a period of at least three years, in accordance with *6.2 Recordkeeping*.

2.4.2 Annual Inspections

The facility conducts and documents annual (once per year) visual inspections of all containers and equipment, using the annual checklist in *Appendix D: SPCC Facility Inspection Log*. These annual inspections do not require a Certified Inspector, but are completed by someone familiar with the facility, tanks, containers, liquids stored, pumps, pipes, and valves, and who can identify changes and developing problems. Inspections include checking:

- Secondary containment structures for evidence of damage;
- Tank foundation and support structures for signs of settlement, corrosion, or damage;
- Tank or container exterior coatings for needed cleaning or maintenance;
- The tank's normal and emergency vents for needed cleaning or maintenance; and
- Tank or container liquid-level and overflow-prevention sensing devices.

The SPCC Coordinator maintains documentation of inspections with the SPCC Plan for a period of at least three years, in accordance with *6.2 Recordkeeping*.

2.4.3 Integrity Testing and Formal Third-Party Inspections

No aboveground storage tanks at the facility require integrity testing or formal third-party inspections. According to STI SP-001 § 5, aboveground storage tanks up to 1,101 gallons in capacity with spill control (such as a double-walled tank) and a continuous release detection method do not require integrity testing or formal third-party inspections. Because of its size and double-walled design with continuous release detection, the 1,000-gallon used oil tank (diagram label B) does not require integrity testing or formal third-party inspections.

According to STI SP-001 § 5, visual inspection of portable containers with adequate secondary containment satisfies integrity testing requirements.⁷ This Plan provides visual inspection schedules and criteria in *2.4.1 Monthly Inspections* and *2.4.2 Annual Inspections*.

⁷ See also U.S. Environmental Protection Agency, Office of Emergency Management, Spill Prevention, Control and Countermeasure Plan (SPCC) Program: Bulk Storage Container Inspection Fact Sheet, page 6 (2012), available at <http://www.epa.gov/osweroe1/docs/oil/spcc/integrity-testing-factsheet.pdf>.

2.5 Trainings and Briefings

The facility trains all oil-handling personnel upon assignment and annually on the following topics:

- Contents of this SPCC Plan, including identifying the SPCC Coordinator and the ERC;
- Applicable pollution control laws, rules, and regulations;
- Operations and maintenance of spill prevention equipment;
- Precautionary measures;
- Discharge procedures;
- Notification procedures, especially the requirement to notify regulators within 60 days of any single discharge more than 1,000 gallons or two discharges of more than 42 gallons of oil product occurring within any 12-month period;
- General facility operations; and
- Spills, discharges, failures, or malfunctioning components identified since the last training.

The facility documents training using the *Appendix E: Training Log*.

In addition, the SPCC Coordinator, the ERC, and facility personnel who respond to non-incident oil spills are required to have a 24-hour hazardous waste operations and emergency response (HAZWOPER) certification. HAZWOPER-trained employees must attend annual refresher training sessions in order to remain qualified to respond to spills.

2.6 Security

The facility is surrounded by a fence with access gates spanning the driveways. The access gates are open during normal business hours: weekdays from 6:15 a.m. to 3:45 p.m. The fueling stations associated with the underground storage tanks are connected to a card reader system that allows fuel to be dispensed by authorized individuals. Facility personnel monitor the oil storage tanks and areas and fueling stations during normal work hours, and any unusual activity is reported to the SPCC Coordinator.

During non-business hours, the access gates to the facility and the building doors are locked. A light on the south side of the automotive and equipment building automatically illuminates the used oil storage area (diagram label A) and used oil aboveground storage tank (diagram label B) during low-light hours based on a sensor. Overhead lights automatically illuminates the fueling stations associated with the gasoline and diesel underground storage tanks (diagram labels E and F) during low-light hours based on a sensor. The facility is unattended during non-business hours (i.e., overnight and during weekends and holidays) normally for no more than 48 hours.

3. Spill Control

This section of the Plan describes spill and drainage controls such as secondary containment, equipment, and procedures for control of a spill.

3.1 Containment

This Plan is organized so as to be readily usable in an emergency. Therefore, this Plan describes secondary containment and diversionary structures for each oil product storage container or area in *1.2 Oil Product Storage Containers and Secondary Containment*.

The facility uses containment systems compatible with the material in the storage container or area. The facility has containment systems to address typical failure modes. Containment systems provide containment for at least 110 percent of the capacity of any one storage container. The facility promptly removes any accumulations of oil product or water in secondary containment.

The facility maintains four spill kits at strategic locations throughout the facility. The spill kits are mapped in *1.1 Facility Diagram*. The facility maintains the following spill kits in the following locations:

- One storage chest spill kit is located near the diesel fueling station. The spill kit contains the materials necessary to contain 45 gallons of spilled oil, including absorbent socks, absorbent pads, absorbent booms, and temporary disposal bags.
- Two 95-gallon container spill kits are available at the facility; one is located near the diesel fueling station and one is located near the gasoline fueling station. Each spill kit contains the materials necessary to contain 40 gallons of spilled oil, including absorbent booms, absorbent pads, absorbent pillows, loose absorbent, temporary disposal bags, neoprene gloves, disposable boot protectors, and Tyvek® level D coveralls.
- One 32-gallon oil absorbent mat roll, one 22-gallon box of absorbent pads, and 4.5-gallon granular absorbent material are located within the automotive and equipment maintenance garage to contain spills.

3.2 Mobile and Portable Containers

The facility positions mobile and portable oil storage containers within the automotive and equipment maintenance garage storage area so as to prevent discharges. Mobile and portable containers are maintained by the facility inside the automotive and equipment maintenance garage. The facility maintains drums on spill pallets (83-gallon Drum Poly-Spillpallet™ 6000) and maintains spill absorbent materials within close proximity.

The facility utilizes active containment measures for the transportation mobile refueler stored in the automotive and equipment maintenance garage so as to prevent discharges. The facility utilizes absorbent material from the two 95-gallon container spill kits maintained near the fueling stations and the absorbent material maintained inside the automotive and equipment maintenance garage to actively respond to spills in accordance with *4.2 Response*. The facility also plugs drains in the automotive and equipment maintenance garage to prevent discharge.

The facility utilizes active containment measures for mobile and portable oil storage containers within the used oil storage area so as to prevent discharges. Mobile and portable containers are maintained by the facility outside of the automotive and equipment maintenance garage in the used oil storage area. The facility maintains spill absorbent materials inside the automotive and equipment maintenance garage to actively respond to spills in accordance with *4.2 Response*.

4. Spill Countermeasure

This section of the Plan describes countermeasures for spill discovery, response, and cleanup. The facility directs all efforts first to the preservation of life and the protection of persons from bodily harm. Where appropriate, this section delineates between the facility's capabilities and capabilities potentially requiring a contractor to perform.

4.1 Discovery

Upon discovering or becoming aware of a spill or leak of oil anywhere within the facility, the discoverer must immediately notify the ERC and the SPCC Coordinator listed in *1.4 Contact List*. The ERC or the SPCC Coordinator should ask the discoverer for the following information:

- Time the spill occurred or was first observed;
- Where the spill occurred and the extent of the present location, if the spill is flowing away from the original site;
- Type of oil product spilled;
- Estimated amount spilled and, if still continuing, the rate of release;
- Description of areas likely to be affected by the spill;
- Cause of spill, if determined; and
- Any damage/injuries that may have resulted from the spill.

The ERC and the SPCC Coordinator are responsible for reporting the spill to other facility and NPS personnel and external government agencies in accordance with *5. Discharge Notification*.

4.2 Response

The facility undertakes the necessary and appropriate actions to respond to releases and secure the area to protect human health and the environment.

The ERC evaluates the situation to determine if, based on professional judgment, the spill is incidental.

Incidental spills are those spills of known material that the ERC and other appropriate personnel can handle safely without potential health hazards (e.g., fire, explosion, or chemical exposure) given the training, equipment, and resources available. The ERC considers most spills less than five gallons to be incidental spills that can be controlled and cleaned up at the time of release by trained personnel or fuel delivery contractors in the immediate area.

Non-incidental spills are those spills that cannot be safely or fully handled by the ERC and other appropriate personnel without additional help. Non-incidental spills involve:

- Unknown spilled materials or spilled materials with unknown health and safety hazards;
- A large spill that cannot be readily absorbed, neutralized, or otherwise controlled at the time of the release; or
- Those spills that present an actual or significant potential of injury.

The ERC considers most spills greater than five gallons to be non-incidental spills that cannot be controlled and cleaned up at the time of release by the non-HAZWOPER trained-personnel or the fuel delivery contractors in the immediate area.

The ERC will consider the spill source, the material and quantity spilled, the potential hazards posed by the spill, and the presence of potential receptors such as drains and soils when determining the spill type and the proper response.

4.2.1 Incidental Spills

The ERC immediately takes all reasonable actions to control and contain an incidental spill at its source to prevent further release. The ERC uses the spill kits described in *3.1 Containment* to contain the incidental spill. Other actions include, but are not limited to, closing valves, plugging or patching holes, transferring the contents of a leaking container to a sound one, shutting down tanks, or removing oil from tanks.

4.2.1 Non-Incidental Spills

To respond to non-incidentals spills, the ERC or the SPCC Coordinator call the cleanup contractors or the Alexandria Fire Department listed in *1.4 Contact List*. HAZWOPER-trained facility personnel may only respond defensively to a non-incidentals spill (e.g., keep it contained) until help can arrive. Facility personnel who are not trained in HAZWOPER will not take action to contain non-incidentals spills.

The ERC determines the need to evacuate the area, building, or entire facility and instructs onsite personnel and visitors to follow the facility's evacuation procedures.

4.3 Cleanup

The ERC and the SPCC Coordinator facilitate cleanup of spill response materials and spilled product via the cleanup contractors listed in *1.4 Contact List*.

The SPCC Coordinator and the ERC restock the used spill kit material within a reasonable time following a spill response action.

The facility commits the manpower, equipment, and materials required to expeditiously control and remove any potentially harmful quantity of oil spilled or discharged.

4.4 Disposal

The facility disposes of recovered materials in accordance with applicable legal requirements. The SPCC Coordinator facilitates disposal of spill response materials and spilled product via contractors, including the cleanup contractors listed in *1.4 Contact List*.

The facility immediately takes all reasonable actions to abate, remove, manage, and dispose of spilled oil, contaminated soil or water, and waste generated as a result of spills in accordance with federal and state requirements and in a manner that will not result in adverse impacts to human health and safety and the environment.

4.5 Spill Review

After a spill, the SPCC Coordinator reviews the incident and determines the cause. The facility reevaluates containers and piping following a spill, leak, failure, or discharge. The SPCC Coordinator identifies procedures and practices to prevent similar incidents from recurring.

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5. Discharge Notification

This section of the Plan describes information and procedures to enable a person reporting a discharge to relate all required information.

5.1 Internal Discharge Notification

All oil spills must be immediately reported to the SPCC Coordinator and the ERC.

If the spill is above five gallons, the ERC or SPCC Coordinator reports the spill to the following NPS personnel or offices listed in *1.4 Contact List*:

- The park Superintendent;
- The NPS National Emergency Incident Coordination Center at (888) 246-4335; and
- The NCR Environmental Protection Specialist.
 - Note: In the event the NCR Environmental Protection Specialist cannot be reached directly, park staff should leave a voicemail.

The NCR Environmental Protection Specialist should be notified before any local, state, or federal agencies are contacted. However, park staff should not delay notifying outside agencies when the NCR Environmental Protection Specialist cannot be reached directly.

The NCR Environmental Protection Specialist is responsible for reporting the spill to the WASO Spill Response Coordinator.

5.2 Virginia Discharge Notification

The facility notifies the DEQ Northern Virginia Regional Office at (703) 583-3800 of any oil discharges, regardless of volume, to state waters or storm drain systems that cause a film, sheen, or discoloration to water. The facility will notify the DEQ of oil discharges of 25 gallons or more to state lands. For discharges less than 25 gallons onto state lands, the facility will clean up the discharge and maintain a record of the discharge at the facility for a period of five years. At a minimum, documentation of spills less than 25 gallons should include the date of the spill, volume and type of material spilled, and an explanation about the cleanup of the spill.⁸

When required to report discharges to the DEQ, the facility also reports to the Virginia Department of Emergency Management at (800) 468-8892 and local authorities that are reasonably expected to be affected by the discharge. The report to the Virginia Department of Emergency Management must include the following information:

- Discharge location;
- Discharge date and time;
- Type and quantity of material released; and
- Source of the discharge (if known).

⁸ Virginia Department of Environmental Quality, *Storage Tank Program Technical Manual*, pages 2-14–15 (4th ed., 2011), available at www.deq.virginia.gov/Portals/0/DEQ/Land/Tanks/012024d.pdf.

The facility uses *Appendix H: Virginia Discharge Notification Form* to ensure the notification contains all required information.

5.3 Federal Discharge Notification

The facility immediately notifies the National Response Center when a discharge or spill reaches navigable waters or adjoining shorelines. The National Response Center can be reached at (800) 424-8802 or (202) 267-2675.

In addition, the facility notifies EPA Region 3 at (800) 438-2474 or (215) 814-5000 within 60 days when either of the following occurs:

- A single discharge of more than 1,000 gallons of oil; or
- Two reportable discharges (requiring reporting to the National Response Center) of more than 42 gallons of oil occurring within any 12-month period.

In both instances, the facility uses *Appendix I: Federal Discharge Notification Form* to ensure the notification contains all required information.

6. Plan Maintenance

This section of the Plan describes procedures for administrative maintenance of the SPCC Plan.

6.1 Review and Amendment

The facility must review and evaluate the SPCC Plan under the following circumstances:

- Once every five years;
- When changes in facility design, construction, operation, or maintenance materially affect the facility's potential to discharge oil; or
- Upon request by a state or federal regulator.

As a result of the review, the facility amends the SPCC Plan within six months and implements the amendments as soon as possible, but not later than six months, following the amendment.

The facility must self-certify, or a Professional Engineer must certify, any technical amendments to the SPCC Plan, including:

- Commissioning of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition altering secondary containment;
- Changes to products, services, or standard operations; or
- Modification of testing and inspection procedures.

Only a Professional Engineer can certify the adoption of alternative measures providing equivalent environmental protection that deviate from specific requirements of 40 CFR Part 112. In addition, a Professional Engineer must certify any changes to the Plan if the facility has had a single discharge exceeding 1,000 gallons or two discharges each exceeding 42 gallons within any 12-month period in the three years prior to the SPCC Plan certification date, or if the facility adds oil storage containers such that the new aggregate aboveground oil storage capacity is greater than 10,000 gallons.

To self-certify an amendment, the signing facility personnel must attest to the following:

- The undersigned facility personnel is familiar with the requirements of 40 CFR Part 112;
- The undersigned facility personnel has visited and examined the facility;
- The Plan has been prepared in accordance with accepted and sound industry practices and standards, and with the requirements of 40 CFR Part 112;
- The Plan establishes procedures for required inspections and testing;
- The facility will fully implement the Plan;
- The facility meets the qualification criteria set forth under 40 CFR § 112.3(g)(2);
- The Plan does not deviate from any requirement of 40 CFR Part 112 as allowed by 40 CFR § 112.7(a)(2) and 112.7(d) or include measures pursuant to 40 CFR § 112.9(c)(6) for produced water containers and any associated piping, except as provided in 40 CFR § 112.6(b)(3); and

- The Plan and individuals responsible for implementing the Plan have the full approval of management, and the facility owner or operator has committed the necessary resources to fully implement the Plan.

Non-technical amendments to the SPCC Plan, which do not require self-certification or a Professional Engineer's certification, include the following:

- Changes to names or contact information; and
- Changes to cleanup contractors.

The facility documents the review's completion using *Appendix J: SPCC Plan Review Form*. The facility stores completed forms at the beginning of the SPCC Plan.

6.2 Recordkeeping

The facility maintains a complete, certified copy of the Plan in the SPCC Coordinator's office. The facility may provide additional copies readily available near oil storage containers. The facility makes this Plan available to the Regional Administrator for onsite review during normal business hours.

The facility maintains all records concerning oil released and prevention efforts for a period of three years. These records, which must be kept on file, include the following:

- Completed inspection certifications and checklists;
- Training logs;
- Correspondences to and from regulatory agencies;
- Records of changes made to the SPCC Plan; and
- Documentation of spill reports, responses, and remediation efforts.

APPENDIX A: CROSS REFERENCE CHART

In some cases, this SPCC Plan diverges from the sequence of 40 CFR Part 112. This cross reference chart shows the location of each section of 40 CFR Part 112 within this Plan.

40 CFR Part 112	Description	SPCC Plan Location
Subpart A: Applicability, Definitions, and General Requirements for All Facilities and All Types of Oils		
§ 112.1	General applicability	<i>Purpose and Scope</i>
§ 112.2	Definitions	<i>Not Applicable</i>
§ 112.3	Requirement to prepare and implement an SPCC Plan	<i>Purpose and Scope</i>
§ 112.4	Amendment of SPCC Plan by Regional Administrator	<i>6.1 Review and Amendment</i>
§ 112.5	Amendment of SPCC Plan by owners or operators	<i>6.1 Review and Amendment</i>
§ 112.6	Qualified facilities plan requirements	<i>Purpose and Scope</i>
§ 112.7	General requirements for SPCC Plans	
§ 112.7(a)(1)	Conformance	<i>Purpose and Scope</i>
§ 112.7(a)(2)	Compliance	<i>Purpose and Scope</i>
§ 112.7(a)(3)	Physical layout and facility diagram	<i>1. Facility Information 1.1 Facility Diagram</i>
(a)(3)(i)	Oil storage type and capacity	<i>1.2 Oil Product Storage Containers and Secondary Containment</i>
(a)(3)(ii)	Discharge prevention measures	<i>2. Spill Prevention</i>
(a)(3)(iii)	Discharge or drainage controls	<i>3. Spill Control</i>
(a)(3)(iv)	Countermeasures	<i>4. Spill Countermeasure</i>
(a)(3)(v)	Recovered material disposal	<i>4.4 Disposal</i>
(a)(3)(vi)	Contact list	<i>1.4 Contact List</i>
§ 112.7(a)(4)	Response plan or spill reporting	<i>5. Discharge Notification</i>
§ 112.7(a)(5)	Usable in emergency	<i>Purpose and Scope</i>
§ 112.7(b)	Discharge flow	<i>1.3 Discharge Flow</i>
§ 112.7(c)	Containment	<i>1. Facility Information 1.1 Facility Diagram 1.2 Oil Product Storage Containers and Secondary Containment 1.3 Discharge Flow 3. Spill Control</i>
§ 112.7(d)	Professional Engineer certification	<i>Professional Engineer Certification</i>
§ 112.7(e)	Inspections	<i>2.4 Inspections</i>
§ 112.7(f)(1)	Training	<i>2.5 Trainings and Briefings</i>

§ 112.7(f)(2)	Designated accountable person	<i>1.4 Contact List</i>
§ 112.7(f)(3)	Briefings	<i>2.5 Trainings and Briefings</i>
§ 112.7(g)	Security	<i>2.6 Security</i>
§ 112.7(h)	Tank car and truck	<i>Not applicable</i>
§ 112.7(i)	Repair	<i>2.1 Containers</i>
§ 112.7(j)	State-level requirements	<i>Purpose and Scope</i>
§ 112.7(k)	Oil-filled operational equipment	<i>1.2 Oil Product Storage Containers and Secondary Containment</i>
Subpart B: Requirements for Petroleum Oils and Non-petroleum Oils, Except Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils (Including Oils from Seeds, Nuts, Fruits, and Kernels)		
§ 112.8	SPCC Plan Requirements for onshore facilities (excluding production facilities)	
§ 112.8(a)	Compliance with § 112.7	<i>Purpose and Scope</i>
§ 112.8(b)	Drainage systems, diked storage, treatment systems	<i>Not applicable</i>
§ 112.8(c)(1)	Compatibility	<i>1.2 Oil Product Storage Containers and Secondary Containment</i>
§ 112.8(c)(2)	Capacity plus precipitation containment	<i>3.1 Containment</i>
§ 112.8(c)(3)	Drainage systems, diked storage, treatment systems	<i>Not applicable</i>
§ 112.8(c)(4)	Buried metal tank corrosion prevention	<i>Not applicable</i>
§ 112.8(c)(5)	Partially buried or bunkered metal tanks	<i>Not applicable</i>
§ 112.8(c)(6)	Testing and inspection	<i>2.4 Inspections</i>
§ 112.8(c)(7)	Internal heating coils	<i>Not applicable</i>
§ 112.8(c)(8)	Good engineering practice	<i>Purpose and Scope</i> <i>2.1 Containers</i>
(c)(8)(i)-(v)	Liquid-level sensing devices	<i>2.2 Overfill Prevention</i>
§ 112.8(c)(9)	Treatment facilities	<i>Not applicable</i>
§ 112.8(c)(10)	Visible discharges	<i>2.1 Containers</i> <i>2.3 Routine Handling of Oil Products</i> <i>2.4 Inspections</i>
§ 112.8(c)(11)	Mobile or portable containers	<i>2.1 Containers</i>
§ 112.8(d)(1)	Buried piping corrosion protection	<i>Not applicable</i>
§ 112.8(d)(2)	Tank terminals	<i>Not applicable</i>
§ 112.8(d)(3)	Pipe supports	<i>Not applicable</i>
§ 112.8(d)(4)	Pipe inspection	<i>Not applicable</i>
§ 112.8(d)(5)	Vehicular traffic	<i>2.1 Containers</i> <i>2.3 Routine Handling of Oil Products</i>

§ 112.9	SPCC Plan requirements for onshore oil production facilities (excluding drilling and workover facilities)	<i>Not Applicable</i>
§ 112.10	SPCC Plan requirements for onshore oil drilling and workover facilities	<i>Not Applicable</i>
§ 112.11	SPCC Plan requirements for offshore oil drilling, production, or workover facilities	<i>Not Applicable</i>
Subpart C: Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and Vegetable Oils, Including Oils from Seeds, Nuts, Fruits, and Kernels)		
§ 112.12	SPCC Plan requirements	<i>Not Applicable</i>
Subpart D: Response Requirements		
§ 112.20	Facility response plan	<i>Not Applicable</i>
§ 112.21	Facility response training and drills/exercises	<i>Not Applicable</i>

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APPENDIX B: CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

Facility:	Parkway Maintenance Facility 2700 George Washington Memorial Parkway, Arlington, VA 22202
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1. Does the facility transfer oil overwater to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C of 40 CFR 112 or a comparable formula⁹) 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 in Attachment C-III to Appendix C of 40 CFR 112 or a comparable formula¹⁰) such that a discharge from the facility would shutdown a public drinking water intake¹¹?
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 discharge 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.

Signature	Name
Title	Date

⁹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

¹⁰ See footnote 9.

¹¹ For the purpose of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR § 143.2(c).

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APPENDIX C: FUEL DELIVERY CHECKLIST

Facility personnel use this checklist during fuel delivery to the tanks at the facility in accordance with *2.3 Routine Handling of Oil Products*. This information will be shared with all fuel delivery companies making deliveries to the park.

Facility:	Parkway Maintenance Facility 2700 George Washington Memorial Parkway, Arlington, VA 22202
Date:	
Tank fueled:	
Tank operator present during fueling	Yes <input type="checkbox"/> No <input type="checkbox"/>
Tank filling is monitored constantly	Yes <input type="checkbox"/> No <input type="checkbox"/>
Tank level before loading	(1) _____ (inches) _____ (gallons)
Tank level after loading	(2) _____ (inches) _____ (gallons)
Total loaded (3 = 2 - 1)	(3) _____ (inches) _____ (gallons)
Storage tank and related piping inspected	Yes <input type="checkbox"/> No <input type="checkbox"/>
5-gallon drip bucket under discharge hose (Where needed)	Yes <input type="checkbox"/> No <input type="checkbox"/>
Storm drains covered	Yes <input type="checkbox"/> No <input type="checkbox"/>
Absorbent materials available	Yes <input type="checkbox"/> No <input type="checkbox"/>
Any leaks or spills	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, describe actions taken:
Wheels chocked	Yes <input type="checkbox"/> No <input type="checkbox"/>

Acknowledgment of Receipt of Materials:

Acknowledgment of Transfer of Materials:

Park Personnel Signature

Fuel Delivery Driver Signature

Name

Name

Date

Date

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APPENDIX D: SPCC FACILITY INSPECTION LOG

The visual inspection of the aboveground storage tank and the portable containers will be completed on a monthly basis. Inspections of the aboveground storage tank include examining the tank for signs of corrosion or damage to piping and valves, inspecting tank supports and secondary containment for damage or irregularity, and observing the tank and surrounding area for any evidence of leakage.

In addition to the monthly inspections of the aboveground storage tank and the portable containers, the annual inspection log must be completed each year for the aboveground storage tank.

In addition to visual inspections, the SPCC Coordinator will be responsible for ensuring that the aboveground storage tank and portable containers are tested for integrity in accordance with *2.4.3 Integrity Testing and Formal Third-Party Inspections* of this Plan.

Instructions: Place an X in the status box for each item. If any “Yes” response is observed, the inspector will provide a description of the non-conformance with the checklist item as well as notes on what was done to address the observed issue.

The SPCC Coordinator will maintain copies of Inspection Logs with the SPCC Plan for a period of at least three years.

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MONTHLY ABOVEGROUND STORAGE TANK VISUAL INSPECTION LOG

Facility Name:	Parkway Maintenance Facility		
Facility Address:	2700 George Washington Memorial Parkway Arlington, VA 22202		
# of Tanks Inspected:		Tank IDs:	

Any item marked "No" requires additional information to describe the condition and date the condition is corrected.

	ITEM	STATUS	COMMENTS / DATE CORRECTED
Primary Tank and Piping			
1	Is tank exterior (e.g., roof, shell, ends, connections, fittings, valves) free of visible leaks? <i>Note: If "No," identify tank and describe leak.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Is aboveground piping (e.g., valves, fittings, connections, pumps) free of visible leaks? <i>Note: If "No," identify tank and describe leak.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Are ladders/platforms/walkways secure with no sign of severe corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
4	Are all tank openings properly sealed (e.g., capped, plugged, covered, blind flanged)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Is the tank liquid-level gauge readable and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	

	ITEM	STATUS	COMMENTS / DATE CORRECTED
6	Is overflow prevention equipment (e.g., overflow valve, liquid-level sight gauge) in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
7	Is the spill container (i.e., spill bucket) empty, free of visible leaks, and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
8	Is the primary tank free of water?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
9	Is the area around the tank (e.g., concrete surfaces, ground, containment) free of visible signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Is the cathodic protection system in operating condition and functional? <i>Note: Inspection required every 60 days only.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
11	Was a rectifier reading taken? <i>Note: Inspection required every 60 days only.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA <i>If "Yes," note the reading in volts and amps in the Comments column.</i>	Volts: _____ Amps: _____
Double-walled Tank			
12	For double-walled tanks, is interstitial space free of liquid?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	
13	For double-walled tanks, is interstitial monitoring equipment in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA	

	ITEM	STATUS	COMMENTS / DATE CORRECTED
Spill Kits			
14	Do the associated spill kits contain adequate response materials in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Other Conditions			
15	Are there other conditions needing to be addressed for continued safe operation or that may affect the site SPCC Plan?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Inspector Information

Signature

Name

Title

Date

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ANNUAL ABOVEGROUND STORAGE TANK VISUAL INSPECTION LOG

This inspection log must be completed each year for all aboveground storage tanks. If necessary, provide further description and comments on a separate sheet of paper and attach to this sheet. Any item receiving a “yes” must be described and addressed immediately.

Facility Name:	Parkway Maintenance Facility		
Facility Address:	2700 George Washington Memorial Parkway Arlington, VA 22202		
# of Tanks Inspected:		Tank IDs:	

Any item marked “Yes” requires additional information to describe the condition and date the condition is corrected.

	ITEM	STATUS	COMMENTS / DATE CORRECTED
Primary Tank			
1	Do tank surfaces show signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Do tanks show signs of damage, rust, or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3	Are bolts, rivets, or seams damaged?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4	Are level gauges or overfill alarms inoperative?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5	Is water/oil present in interstitial spaces of the double-walled tank?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
6	Are pumps and valves unlocked?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7	Do normal and emergency tank vents require cleaning, or maintenance?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Do coatings of exterior tanks require maintenance, cleaning, or painting?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	ITEM	STATUS	COMMENTS / DATE CORRECTED
Tank Area and Piping			
9	Does the concrete pad or ground below tank show signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
10	Is the concrete pad cracking?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Is water draining toward the tank?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	Do pipelines and connections show signs of leakage or deterioration?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
13	Are tank supports deteriorated or buckled?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
14	Have tank foundations eroded or settled?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
15	Is the tank area obstructed by equipment, vegetation, or trash?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
16	Does the containment structure show signs of damage or straining?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Inspector Information

Signature

Name

Title

Date

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Portable container area obstructed by equipment, vegetation, or waste debris?												
Portable containers being stored outside the designated storage area?												
Other issues observed?												

Section II: Specific Issues Log

If problems are encountered with the facility's portable containers, they should be logged below, indicating the month, component, problem, action to be taken, and completion date.

Month	Component	Problem	Action to be Taken	Corrective Action / Completion Date

Inspector Information

Signature

Name

Title

Date

APPENDIX E: TRAINING LOG

Each undersigned employee acknowledges that he/she has been briefed by the SPCC Coordinator or their designee(s) on the following topics:

- Contents of this SPCC Plan, including identifying the SPCC Coordinator and the ERC;
- Applicable pollution control laws, rules, and regulations;
- Operations and maintenance of spill prevention equipment;
- Precautionary measures;
- Discharge procedures;
- General facility operations; and
- Spills, discharges, failures, or malfunctioning components identified since the last training.

Instructor:		
Training Course Title:		
Employee Printed Name	Employee Signature	Date

Instructor Signature

Date

After each training session, please give a copy of this sheet to the SPCC Coordinator.

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APPENDIX F: FACTSHEET

FUEL DELIVERY PROCEDURES FOR PARK PERSONNEL

Objective:

These procedures were developed to prevent spills and overfilling of bulk fuel storage tanks containing oil and oil-based products.

Scope:

These procedures apply to all park personnel observing and completing the loading and unloading of bulk materials to the facility's underground storage tanks.

Responsibilities:

Park personnel receiving bulk materials must perform the following steps.

1. Complete the *Appendix C: Fuel Delivery Checklist* for all bulk fuel deliveries and pickups.
2. Gauge tank level/capacity before unloading any bulk material.
3. Ensure absorbent materials are available.
4. Inspect storage tank's fill pipe to ensure there is no blockage, cracking, or leaking before connecting hose.
5. Remain present at the transfer site to constantly monitor the entire unloading process to prevent overfilling and spilling.
6. Give permission to tank truck driver to unload.
7. Ensure the driver:
 - Exercises caution when maneuvering vehicles to avoid damage to containers, piping, secondary containment structures, etc.;
 - Parks the delivery truck in a location that minimizes the potential for release to navigable waterways;
 - Plugs or covers drains and basins if appropriate;
 - Chocks wheels on truck;
 - Checks all truck outlets and valves for signs of leakage before and after unloading;
 - Ensures security of all connections prior to fueling;
 - Ensures all liquid is out of the hose prior to disconnecting; and
 - Disconnects hoses and secures them to the vehicle prior to departing.
8. Report to the SPCC Coordinator and the ERC any occurrences of leaks or spills during transfer.
9. Inform the SPCC Coordinator of any maintenance that, if left undone, could result in a leak or spill.

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APPENDIX G: NOTICE TO OIL VENDORS

TO: All Bulk Oil Product Vendors
FROM: SPCC Coordinator, Anthony Migliaccio
DATE:
SUBJECT: Oil Vendor Spill Prevention, Control, and Countermeasure (SPCC) Requirements

All oil product vendors who deliver, load, unload, or pick up oil to or from our facility are required to comply with the following requirements.

1. Exercise caution when maneuvering vehicles in order to avoid damage to secondary containment structures.
2. Drivers are to be present and alert to monitor the transfer of oil products full-time while product is being transferred to or from onsite storage containers.
3. Chock the tank truck wheels while loading or unloading tanks, and do not to remove the wheel chocks until the transfer is complete and the transfer hose is disconnected to prevent an accidental drive-off without removing the transfer hose.
4. Prior to filling and departure, closely inspect for discharges at the lowermost drain and all outlets of the tank truck, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.
5. Continuously monitor for potential tank overfills while loading or unloading storage containers. Check the freeboard capacity of containers prior to filling to estimate the volume to fill the tank, and visually monitor the filling process to ensure the tank does not overflow. For tanks with audible air vent alarms, continuously listen for the audible air vent overflow warning whistle.
6. Promptly stop and clean up any incidental leaks or spills that occur while loading or unloading containers.
7. Immediately report to the SPCC Coordinator any leakage or spillage that requires cleanup assistance from site personnel.
8. Prior to loading/unloading, under the end of the hose that will be disconnected first, place an empty container with enough capacity to catch the remaining liquid in the transfer hose. Verify that appropriate valves are closed before disconnecting loading/unloading lines. Prior to disconnecting the transfer hose, gravity drain remaining product in the hose to the lowest container.

This notice is provided to make you aware of these requirements so that you can help prevent spills and overflow. This notice is also as an integral part of our SPCC Plan maintained on site and available for your inspection.

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APPENDIX H: VIRGINIA DISCHARGE NOTIFICATION FORM

The facility uses this form to document spills and notify agencies in accordance with 5.2 *Virginia Discharge Notification*.

Facility Information	
Name	Parkway Maintenance Facility
Address	2700 George Washington Memorial Parkway
City	Arlington
State	Virginia
Zip Code	22202
County	Arlington
Telephone Number	(703) 419-6412
Latitude	38° 50'51.32"N
Longitude	77° 2'57.49"W

Owner/Operator Information	
Name	National Park Service George Washington Memorial Parkway Headquarters
Address	700 George Washington Memorial Parkway
City	McLean
State	Virginia
Zip Code	22101
County	Fairfax
Telephone Number	(703) 289-2500
Contact Name	Alex Romero
Contact Title	Superintendent
Contact Telephone Number	(703) 289-2511

Discharge Information	
Location within Facility	
Date	
Time	
Source (Equipment, Tank, Container, etc.)	
Cause	
Type of Material Released	

Quantity of Material Released	
Affected Media (Land, Water, etc.)	
Weather Conditions	

Cleanup Information	
Mitigation Actions	
Corrective Actions	

Additional Information

APPENDIX I: FEDERAL DISCHARGE NOTIFICATION FORM

The facility uses this form to notify agencies in accordance with 5.3 *Federal Discharge Notification*.

Facility Information	
Name	Parkway Maintenance Facility
Address	2700 George Washington Memorial Parkway
City	Arlington
State	Virginia
Zip Code	22202
County	Arlington
Telephone Number	(703) 419-6412
Latitude	38° 50'51.32"N
Longitude	77° 2'57.49"W
Active Aboveground Storage Capacity <small>(40 CFR Part 112 regulated substances and containers)</small>	2,025 gallons
Maximum Aboveground Storage Capacity	2,525 gallons
Maximum Underground Oil Storage Capacity	40,000 gallons
Description	Print and include section 1. <i>Facility Information</i>
Maps and Diagrams	Print and include sections 1.1 <i>Facility Diagram</i> and 1.3 <i>Discharge Flow</i>

Owner/Operator Information	
Name	National Park Service George Washington Memorial Parkway Headquarters
Address	700 George Washington Memorial Parkway
City	McLean
State	Virginia
Zip Code	22101
County	Fairfax
Telephone Number	(703) 289-2500
Contact Name	Alex Romero
Contact Title	Superintendent
Contact Telephone Number	(703) 289-2511

Discharge Information	
Location within Facility	

Source (Equipment, Tank, Container, etc.)	
Cause	
Date	
Time	
Material	
Quantity	
Affected Media (Land, Water, etc.)	
Damages or Injuries	
Evacuation Required?	
Individuals and Organizations Notified	
Weather Conditions	

Response Information	
Mitigation Actions	
Corrective Actions	
Preventive Measures to Prevent Recurrence	

Additional Information	
Any Additional Information the Regulators May Reasonably Require	

APPENDIX J: SPCC PLAN REVIEW FORM

The facility uses this form to record the facility's review and evaluation of the SPCC Plan in accordance with *6.1 Review and Amendment*. The facility stores completed forms at the beginning of the SPCC Plan.

By signing below, the signatory certifies that he or she has completed a review and evaluation of the SPCC Plan for the facility.

Review Date:	
SPCC Plan Amendment/Revision:	Yes <input type="checkbox"/> No <input type="checkbox"/>
Sections Containing Amendment/Revision(s):	
Type of Amendment/Revision:	Technical <input type="checkbox"/> Non-technical <input type="checkbox"/>
Amendment/Revision Completion Date:	
Reviewer's Name:	
Reviewer's Title:	
Reviewer's Signature:	