SPCC & Facility Response Plans

SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN (SPCC)

FOR

THE ST. JOHN MARINA
Coral Bay, St. John, USVI

Date Revised

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Prepared by:

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1. GENERAL APPLICABILITY

This Plan is arranged to track the order of the requirements of Spill Prevention Control and Countermeasures (SPCC) Plans in 40 CFR Part 112. For example, Section 1: “General Applicability “tracks the provisions in 40 CFR Part 112.1; Section 2: “Definitions” tracks the provisions of 40 CFR Part 112.2; etc.

This Plan establishes procedures, methods, and equipment requirements to prevent a discharge of oil or diesel from The St. John Marina (“Marina”) into or upon navigable waters of the United States or adjoining shorelines, or upon the waters of the contiguous zone, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the US.

The Marina stores, transfers, uses or consumes oil and oil products, and the oil and oil products are contained in the following types of containers:

1) Aboveground storage tanks for fueling vessels in the Marina;

2) Fuel tanks serving several onsite generators are located in the Marina complex.

This Plan applies to the Marina because it:

1) It is subject to the jurisdiction of the EPA;

2) It is located [40 CFR Part 112.1(d)(1)(i)] such that it could reasonably be expected to discharge oil in quantities that may be harmful.

3) Has the above ground storage capacity of 1,320 gallons or greater in containers equal or greater than 55 gallons. In the Virgin Islands the above ground storage tank capacity at which a TFL is required is 1200 gallons.

This Plan addresses relevant spill prevention, control and countermeasures necessary for the Marina to minimize the potential for discharge of oil. This Plan is used in conjunction with the Operations Manuals for the Marina fueling system and generators. The SPCC Plan along with these manuals are used to ensure the Marina uses proper procedures for the safe handling of oil, for the prevention of discharges and to establish countermeasures for the cleanup and disposal of possible discharges.

2. DEFINITIONS

See 40 CFR Part 112.2 for a complete list of definitions used in this Plan. Some specific definitions that are needed to understand this Plan are listed below.

- ***Adverse Weather*** means weather conditions that make it difficult for the response equipment and personnel to clean up or remove spilled oil, or diesel and that must be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include storms, wind, wave height, possible inundation or flooding, and currents within the area the equipment is intended to operate.
- ***Bulk Oil Storage Container*** means any container used to store oil or diesel. These containers are used for purposes including, but not limited to, the storage of oil, or diesel prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, or operating, equipment is not a bulk storage container.
- ***Contiguous Zone*** means the zone established by the United States under Article 24 of the Convention of the Territorial Sea and Contiguous Zone, that is contiguous to the territorial sea and that extends nine miles seaward from the outer limit of the territorial area.
- ***Discharge*** includes, but is not limited to, spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil but excludes discharges in compliance with a permit issued to the Marina.
- ***Maximum Extent Practicable*** means within the limitations used to determine oil spill planning resources and response times for on-water recovery, shoreline protection, and cleanup for worst case discharges from onshore non-transportation related facilities in adverse weather.
- ***Non-Petroleum Oil*** means any oil of any kind that is not petroleum-based, including but not limited to: fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.
- ***Oil*** means oil of any kind or in any form, including but not limited to: fats, oils, and greases of animal, fish, or marine mammal

origin; and vegetable oils. This includes oils from seeds, nuts, fruits, and kernels. It includes petroleum, fuel, diesel sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with waste other than dredged spoil.

- ***Petroleum Oil*** means petroleum in any form, including but not limited to crude oil, sludge, oil refuse, and refined products.
- ***Storage Capacity*** of a container means the shell capacity of the container.
- ***Transportation-Related and Non-Transportation-related,*** as applied to an onshore or offshore facility, are defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency, dated November 24, 1971,
- ***Worst Case Discharge*** for an onshore non-transportation-related facility means the largest foreseeable discharge in adverse weather conditions as determined using the worksheets provided in Appendix D of 40 CFR Part 112.

3. REQUIREMENTS

3.a The Marina is scheduled to begin operations in early 2015 and this Plan has been developed to comply with the requirements of 40 CFR Part 112, as revised 67 FR 47140, July 17, 2002, as amended at 71 FR 77290, Dec. 26, 2006; 73 FR 74300, Dec. 5, 2008; 74 FR 58809, Nov. 13, 2009]

3.b Not applicable, the facility will begin operations after November 10, 2010.

3.c This Marina is not a mobile facility.

3.d A licensed professional engineer has reviewed and certified the Plan as required in 40 CFR Part 112.3(d). This certification is provided in **Appendix L** and was completed following installation of the site wide generator system.

3.e.1 A complete copy of the Plan is maintained at the Marina offices.

3.e.2 The Plan is available for review during normal working hours for the Marina.

3.f No extension was required to prepare this Plan.

4. AMENDMENT BY AGENCY

4.a A report will be sent to the EPA Regional Administrator and the State agency in charge of oil pollution control activities within 60 days of having either of any of the two releases listed below (the report will contain at least the information listed in **Appendix A**):

- A discharge of more them 42 gallons of oil or diesel in a single event, or
- Two discharges of more than 42 gallons each occurring within any twelve-month period.

4.b There is no requirement to take any action under this section until there is a release equal to or above one of the thresholds listed in Section 4.a of this Plan.

4.c A copy of the report sent to EPA will be sent at the same time to the Virgin Island authorities (Virgin Island Department of Planning and Natural Resources, VIDPNR) in charge of oil pollution control activities.

4.d-f If as a result of the release, the EPA or the VIDPNR requires an amendment to the Plan, the Plan will be amended to comply with the final order requiring the change. The procedures applicable to such orders and possible appeals are covered in 40 CFR Part 112.4(e) & (f).

5. AMENDMENT BY FACILITY (OWNER OR OPERATOR)

5.A The SPCC Plan will be reviewed and amended when there has been a change in the Marina design, construction, operation or maintenance that materially affects the potential for a discharge of oil to navigable waters of the U.S. An amendment to the written Plan will be prepared within six months after such a change and the Plan will be implemented as soon as possible but not later then six months following preparation of the amendment. Examples of changes that, depending upon their effect on the potential for a discharge of oil to navigable water of the U.S., may require the Plan to be amended are:

- Commissioning or decommissioning holding tanks or generators;
- Replacement, reconstruction or movement of fuel holding tanks;
- Construction or demolition that might alter secondary containment structures;
- Changes of fuels;
- Revisions of standards of operations or maintenance procedures;
- Documentation that the Plan has been reviewed is verified in **Appendix B.**
- A Professional Engineer will certify any technical amendments to the Plan as required by 40 CFR Part 112.3(d).

5.B There will be a review and evaluation of the SPCC Plan at least once every **five years** from the date of the last review of the Plan.

- An amendment to the written Plan will be prepared within six months of the review if required.
- The amended Plan will be implemented as soon as possible but not later than six months following preparation of the amendment.
- During the review, consideration will be given to more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge from the facility to navigable waters of the U.S.
- Documentation that the Plan has been reviewed will be verified in **Appendix B**.
- A Professional Engineer will certify any technical amendments to the Plan as required by 40 CFR Part 112.3(d).

6. OTHER

This is a reserved section in the regulations.

This section is not applicable to this facility.

7. GENERAL REQUIREMENTS OF SPCC PLAN

This Plan has been prepared in accordance with good engineering practices. Any additional equipment or storage that is not operational at the time this Plan is discussed in **Appendix C**. Details of installation and operational startup are included for each item. This Plan has the full approval of the Marina management as seen by the documents in **Appendix K**, and the approving manager has the authority to commit the necessary resources to fully implement the Plan.

This Plan follows the format sequences specified in Section 112.7, and therefore a cross-reference list is not required.

7.a.1 This Plan has been written to conform to the requirements of 40 CFR Part 112.

7a.2 Any deviations from the requirements as written in 40 CFR Part 112 are identified where they occur, along with any explanation of the reason for the difference and how the provision in the Plan provide equivalent environmental protection.

7a.3 The St. John Marina is a 145 slip marina with above ground storage tanks located in a secondary containment system landward of the docks. The Marina will have several generators as shown in Appendix D. The generators are used for varying levels of power generation around the project site. Each generator fuel tank is double walled and has in-built leak detection equipment as well as audible high fill alarms immediately adjacent to the fill port which must be constantly attended during filling.

The project is located parcels 10-17, 10-18, 10-19, 13A, 13B, 13 Remainder and 10-41 at Estate Carolina on Coral Bay, St. John, U. S. Virgin Islands. The geographic coordinates of the site are 18°20’36” North Latitude and 64°42’50” West Longitude.

The generators and fuel storage tanks are located as shown in the diagrams within Appendix D. If spills were to occur fuels would flow into drainage collection systems. Equipment is on hand to cover the drains into the drainage system thus preventing the discharge of fuel into the marine environment. The drain covers are located adjacent to the drains so they may be easily accessed in the event of a release. Sorbent pads, and containment sock are located near to each fuel storage tank so that spills can be contained as rapidly as possible. If a release reaches the sea containment booms are located on the marina dock. Sorbent pads and booms are strategically throughout the marina in areas where fueling occurs.

Refer to **Appendix D** for facility locations and facility diagrams.

7.a.3.i A list of oil containers with capacity of 55-gallons or more, the type of oil or fuel in each container and the container storage capacity is included in **Appendix E.**

7.a.3.ii The following discharge prevention measures are being used at the Marina to prevent and control a discharge from routine handling of oil products (further details are found in Appendix F):

- All oil containers (including bulk storage, portable, and process equipment) are observed on a routine basis by trained Marina personnel as they make their routine rounds to maintain the Marina facilities. The personnel are trained in what to look for to detect an oil discharge, how to respond to an oil discharge, and what and how to report a release of oil.
- Trained facility personnel handle portable oil containers and they are trained in proper container movement and handling procedures.
- All bulk fuel transfers from barges and trailers are conducted by trained employees of the Marina or the delivery company as committed to in Appendix F. Where a non-marina employee is involved in the transfer, a marina employee supervises the transfer.

7.a.3.iii Drainage from enclosed storage areas is controlled as follows (see also **Appendix F**):

- All above ground fuel storage tanks will have an engineered secondary containment system with manually operated drainage valves. All drain valves will normally be locked in the closed position. Only properly trained Marina personnel will have access to unlock the valves for water drainage and will be trained to assure there is no sheen on collected rainwater prior to draining. Generators will be located with building enclosures therefore the storage areas are not subject to rainfall catchment and therefore do not need to be drained. All tanks will have internal leak detection, overfill alarms. Fuel cleanup equipment is kept at each generator or fuel storage site.

The Marina is located on the shoreline of Coral Bay. Stormwater runoff from the project site is intercepted by stormwater control facilities that consist primarily of a series of inlets (catch basin, curb

and gutter) connected by a network of drainage pipes of varying size and material. Following treatment by oil/grease and sediment removal structures, the stormwater runoff is discharged to either underground cistern or eastward to the shoreline.

Even though storm drains are regularly maintained and kept clear of debris, heavy rain events may cause contaminated storm water to overflow storm drains and curbing and flow to Coral Bay via sheet flow across isolated parts of the site.

7.a.3.iv Countermeasures for discharge discovery, response and cleanup that are being used at the facility are identified in **Appendix F**.

7.a.3.v Procedures for response, cleanup and disposal of recovered materials are identified in **Appendix F**.

7.a.3.vi **Appendix G** contains the following contact information:

- The contacts with phone numbers and other means of contacting onsite (facility) response coordinator(s);
- The contacts with phone numbers and other means of contacting offsite emergency response personnel;
- The contacts with phone numbers and other means of contacting the National Response Center and other appropriate agencies to be notified in the event of a discharge of oil in harmful quantities to navigable water of the U.S.
- The assignment of who has the authority to approve and contact an outside responder.

7.a.4 The list of information that must be collected to make a report if a discharge occurs is found in **Appendix A** of the Plan. The collection of this information will be started by the person first reporting the discharge, and completed by the supervisor on duty and the facility response coordinator that responds to the reported discharge.

7.a.5 Information that will be needed to respond to a discharge is found in **Appendix A thru Appendix I.**

7.b Containers with a reasonable potential for a failure that could cause a discharge of oil to navigable waters of the U.S. are detailed in **Appendix E** as to flows and quantities that could be discharged

7.c Containment and or diversionary structures or equipment is provided for the fuel tanks listed in **Appendix E** that have been determined to have a reasonable probability of a failure that would discharge oil to navigable waters of the U.S. in quantities that may be harmful.

7.d All fuel piping at the marina is double-walled with integrated leak detection and additional secondary containment, diversionary and other types of structures to contain spills from piping are not necessary for this Marina. This SPCC contains a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil, gasoline or diesel discharged that may be harmful.

7.e Inspections are conducted and are documented following the procedures outlined in Section 8.c.6 of this Plan. Records of the inspections are kept with this Plan for a period of at least three years.

Personnel that handle oil for the Marina are trained in the operation and maintenance of the equipment to prevent discharges of oil or fuel.

- The training, at a minimum, covers the operation and maintenance of equipment, discharge procedures, applicable pollution control laws, rules and regulations, general facility operations, and the contents of this SPCC Plan. **Appendix I** provides a description of the training that the different facility personnel receive.
- Training is documented and includes a roster of employees trained and an outline of the subject material.
- Spill prevention briefings will be held every six months assure adequate understanding of the SPCC Plan. A log of attendance of the briefings will be contained in Appendix I.
- Documentation is retained at the facility for a period of three years.

7.f.2 The employee designated as being accountable for oil discharge prevention is identified in **Appendix G**.

7.f.3 Bi-annual discharge briefings are provided to all oil handling personnel at the Marina. The annual briefing is used to review the major points of the SPCC Plan to assure oil handling personnel understand the Plan. The briefing will highlight and describe known discharges and failures, malfunctioning components, and any recently developed precautionary measures. Documentation of attendance at a discharge prevention briefing is retained at the Marina.

7.g.1 For site security, the Marina is manned 24 hours per day and access to the fuel tanks and dispensing system is restricted.

7.g.2 The master flow and drain valves of fuel containers that would permit the direct outward flow of its contents to the ground or

pavement outside containment are accessible only by trained personnel.

7.g.3 All generators and their associated fuel tanks and the gasoline tank are keyed for limited access.

7.g.4 The loading/unloading connections of fuel tanks are securely capped or have a blank-flange installed. All valves that would permit direct outward flow from the fuel storage are closed and locked.

7.g.5 The Marina area is kept well lit at night. There is adequate lighting to detect discharges occurring during hours of darkness and prevention of discharges occurring through acts of vandalism.

7.h.1 Fuel for the generators and the fuel storage tanks are delivered by private hauler via fuel car or tank truck. The refilling of the tanks adheres to the Transportation Regulations under 40 CFR Part 117, Subpart B for diesel transfer and follow the guidelines describe in Appendix F.

The tanks have audible alarms for high volume to prevent overfilling located adjacent to the fill position.

7.i Aboveground fuel containers are evaluated for brittle fracture or other catastrophic failure when one of the following occurs:

- Such a container undergoes repair, alteration, or a change in service; or
- The container has discharged oil due to brittle fracture or other catastrophic failure

Necessary corrective actions will be taken based on the evaluation. Records that one of the above events has occurred and test results will be maintained along with the Non-Destructive (ND) test results required in Section 8.c.6 of this Plan.

7.j This Plan is written to conform to all the applicable requirements of 40 CFR Part 112. There are no additional requirements in the Virgin Islands rules and regulations for oil pollution prevention. These requirements are covered in the Plan. Pertinent Virgin Island statutes and regulations are provided in **Appendix J**

8. SPECIFIC REQUIREMENTS OF SPCC PLAN

8.a This Plan meets the general requirements of 40 CFR Part 112.7 and the specific discharge prevention and containment procedures listed in 40 CFR Part 112.8.

8.b.1 Drainage from contained storage areas is controlled to prevent a discharge of oil, gasoline or diesel into the environment. All secondary containment drain valves are manual valves normally locked out in the closed position.

8.c.1 The materials and construction of the fuel tanks are compatible with the materials stored in them and conditions of storage (see **Appendix E**).

8.c.2 All installations of tanks where it has been determined that there is a reasonable expectation of a discharge of oil in harmful quantities to navigable waters of the U.S. have secondary containment. The tanks are double walled and therefore are not impacted by precipitation. The fuel storage container installations that have secondary containment are listed in **Appendix E**.

8.c.3 There are containment systems that can collect water and must be routinely inspected.

8.c.4 There are no buried oil containers on site.

8.c.5 There are no partially buried or bunkered metallic oil containers on site.

8.c.6 The following inspections and integrity tests are performed on the fuel storage tanks.

- All fuel storage containers listed in **Appendix E** are visually inspected daily, the results of which are recorded on a log provided in **Appendix H** and kept at the Marina. An electronic gauge system for the above ground storage tanks will be installed prior to placing into service. The audible high sensitive level sensors will provide leak detection and overfill protection for the tank.
- Drums and totes are inspected at least weekly.
- All active fuel storage tanks, piping and valves are periodically visually inspected by the Fuel Supervisor and recorded on the log sheets provided in Appendix H. The visual inspections include close observation of seams, welds, valves and drains over the entire perimeter of the tank for signs of oil.
- Storage tanks are externally inspected during refueling operations.

- All fuel storage containers listed in **Appendix E** are subjected to hydrostatic testing (non-destructive, ND) as specified below:
    - The inspections are performed on a regular basis as required by good engineering practice. The procedure includes filling the fuel lines and inducing pressure up to an average of 250 psi. The schedule frequency is recorded for each container along with the test results.
    - ND testing will be performed whenever material repairs are made to the container.
    - Records of the ND tests and inspections and the frequency of the periodic tests required are kept at the Marina.
    - The frequency of and type of integrity testing takes into account container size and design, including the type of supports and foundation.
    - Oil drums and totes meet DOT specifications. Since drums and totes used to store oil must meet DOT specifications for shipment, additional ND testing is not necessary and will not be performed unless they are converted to long-term on-site use as refillable mobile or fixed oil tanks. Any oil drum converted to such use will be identified in **Appendix E**.
- All inspections and test records are retained for at least three years.
- All 55-gallon oil drums and oil containing totes meet DOT specifications contained in 49 CFR Part 178 Subparts L and M and Sections 178.502, 178.504, and 178.601.

8.c.7 Not applicable

8.c.8 Not applicable

8.c.9 Oil/water separator treatment units are inspected weekly.

8.c.10 Visible discharges of fuel leaks in fuel storage containers, including but not limited to those from seams, gaskets, pumps, valves, rivets, or bolts will be promptly corrected. Any fuel from such leaks that accumulate within a contained area will be promptly removed.

8.c.11 Mobile or portable fuel storage containers are located to prevent a discharge of fuel in harmful quantities to navigable waters as described in 40 CFR Part 112.1(b) except when such containers are being moved from place to place (including temporary stops during such movement), they are located where there is a means of secondary containment, such as a dike or catchment basin sufficient

to contain the capacity of the largest compartment or container sufficient freeboard for normal precipitation.

8.d Not applicable

- See over for appendices -

APPENDIX A

SPILL REPORTING INFORMATION

REPORTING A RELEASE

A. When reporting a release to the US EPA under Section 4 of this Plan (40CFR Part 112.4) use the information below as the minimum required. Part 112.4(a) requires that the report be submitted within 60 days after a discharge that triggers a report (such that a facility has a single discharge of 1000 gallons or more of oil or has had two discharges each greater than 42 gallons in any 12 month period). The report must be submitted to the US EPA Regional Administrator, with a copy to the Virgin Islands Department of Planning and Natural Resources (VIDPNR).

1. Name of facility.
2. Your Name.
3. Location of facility.
4. Maximum storage or handling capacity of the facility and normal daily throughput (normal daily usage).
5. Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements.
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary.
7. The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred.
8. Additional preventive measures you have taken or planned to minimize the possibility of recurrence.
9. Any other information requested by the US EPA or VIDPNR pertinent to the Plan or discharge.

B. Information needed to prepare the report

1. Name of your facility.
2. Your name.
3. Location of facility.
4. Phone number.
5. The date and time of the discharge (including, to the extent know, when the discharge began and stopped).
6. The type of material discharged.
7. An estimate of the total quantity discharged
8. An estimate of the quantity of oil, diesel or gasoline that was discharged to the environment (ground or water).

9. An estimate of the quantity of oil reaching navigable waters of the U.S.
10. Source of the discharge, name of container.
11. What environmental media was contaminated (water/ground).
12. The maximum storage or handling capacity of the facility (container) and normal daily throughput.
13. Cause of the discharge.
14. Any damage or injury caused by the discharge (for example, extent and nature of the impact on waterways).
15. Was an evacuation needed?
16. What actions were taken to stop, remove, and mitigate the effects of the discharge?
17. Names of individuals and/or organizations who have been notified.

APPENDIX B
SPCC PLAN REVIEW DOCUMENTATION

DOCUMENTATION OF A REVIEW OF THE SPCC PLAN

I have completed a review and evaluation of the SPCC Plan for The St. John Marina on the date listed in the table below and the Plan will be amended as a result of the review as listed below.

Name (print)	Signature	Date of Review	Plan Needs Amending?	Changes Needed

Note: See Section 4.d and 5.a for information on completing a review.

APPENDIX C

FUTURE OPERATIONAL PROCEDURES AND/OR FACILITIES

FUTURE OPERATIONAL PROCEDURES AND/OR FACILITIES

Any additional facilities, procedures methods, or equipment that were not fully operational at the time this Plan was certified are discussed below. Details of needed installations and/or operational changes for each are included.

Facilities, Procedures, Methods, & Equipment	Description of what has to be done	Schedule of completion and startup	Completion Date

APPENDIX D
MARINA PLANS AND DIAGRAMS

APPENDIX E

LIST OF CONTAINERS
AND
POTENTIAL SPILL SCENARIOS

POTENTIAL SPILL SCENARIOS

A. Site Description

The Marina is located on relative flat land draining to Coral Bay.

This section to be updated with specific fuel tank information and generator information prior to commencing any fueling or fuel storage operations.

B. Worst Case Spill Scenario

This section to be updated with specific fuel tank information and generator information prior to commencing any fueling or fuel storage operations.

C. Other Potential Spill Areas

1. Aboveground Fuel Storage – All fuel storage tanks are surrounded by containment structures of sufficient volume to contain an fuel spill as a result of a tank failure. Any spills occurring at the aboveground fuel storage tanks will be contained by the curbing surrounding them. These containments are large enough to retain the storage capacity of the largest tank plus additional amount for rainfall.

   Visual inspections of the fuel tanks, other than drums and totes, are conducted daily. The Fuel Supervisor maintains a log of the tank soundings.

2. Drainage of Fuel Storage Areas – All generator tanks are double walled and therefore the secondary containment is not subject to rainfall and does not require drainage. Above ground storage tank secondary containment areas have manually operated drainage valves locked out in the closed position.

   The Facility is located on the shoreline of Coral Bay. Stormwater landing on the project site is intercepted by stormwater control facilities that consist primarily of a series of inlets (catch basin, curb and gutter) connected by a network of drainage pipes of varying size and material. Following treatment by oil/grease and sediment removal structures, the stormwater is discharged westward to the shoreline.

   Even though storm drains are regularly maintained and kept clear of debris, heavy rain events may cause contaminated stormwater to overflow storm drains and curbing and flow to Coral Bay via sheet flow across isolated parts of the site.

APPENDIX F

COUNTERMEASURES AND PROCEDURES FOR FUEL SPILL RESPONSE, CONTAINMENT, CLEANUP AND DISPOSAL

COUNTERMEASURES AND PROCEDURES FOR OIL SPILL RESPONSE, CONTAINMENT, CLEANUP AND DISPOSAL

A. GENERAL PROCEDURES

1. Response

All employees are responsible for identifying and reporting oil releases. The amounts of fuel released that will trigger an internal reporting vary.

1) Small continuous fuel or oil leaks (dripping) that are being contained are not included.
2) Any new leak without consideration of quantity will be addressed by reporting it to the supervisor on duty.

Upon identifying a discharge of diesel or gasoline the employee finding the condition will:

1) Locate the source.
2) Control the release if the employee can do it safely by either:
   - Stopping the discharge.
   - Containing the discharge.
   - Reporting the discharge to the supervisor.
3) The Supervisor will visit the site of the discharge and:
   - Determine the source of the discharge;
   - Determine if the discharge can be stopped.
   - Stop the discharge, or
   - Start collecting, recording the information needed if a report is required.
   - Determine if oil was discharge to any media other than a container or absorbent material.
   - Determine where the discharged fuel went or is going.
   - Determine how much of the discharged fuel was released outside a containment system.
4) The supervisor will determine if the Facility Response Coordinator (FRC), listed in **Appendix G**, should be contacted.
   - This decision will be based on whether the fuel reached a water body and/or the fuel reached the ground.
   - If more than the reportable quantity (Appendix A) of fuel was discharged.
5) When the supervisor determines that the discharge should be reported to the FRC, he should provide the FRC with the information detailed in Appendix A to the extent it is known, however, they should not put off reporting the discharge just to obtain more information.

2. Containing a Discharge

The purpose of this section is to provide instructions on how to prevent or reduce the fuel discharged from becoming a bigger problem by spreading and contaminating a larger area or from reaching a water body. Any measures should be taken only when they can be safely carried out.

This is a two-phased process (Initial and Follow-up) to contain the fuel.

1) Initial Containment

Action should be started as soon as possible to stop, control and contain the discharge with any suitable material on hand. This can reduce the size of the clean up and prevent a serious contamination of water or the ground.

- Initial containment assumes the quantity of oil fuel is small enough to allow containment with hand tools and materials readily available on site.
- This should start as soon as the discharge is identified.
- All initial response must consider the safety of employees involved.
- Personal protective equipment may be required and could include rubber boots, gloves, eye protection, and the area must be marked off and protected from possible sources of ignition.
- Drains must be covered with drain covers during the entire operation.
- Use any suitable material on hand to contain the discharge such as.
    - Absorbents (Appendix G).
    - If outside, quickly dig a hole, build a dam, dig a ditch to a low spot.
    - Containers such as a bucket, drum or pan can be used.
    - Pump or vacuum the oil into a container.

2) Follow-Up Containment

This procedure is much like initial containment. Its primary objective is to contain a larger quantity of fuel and confine the contamination to as small an area as possible and to prevent oil from reaching any water.

- The supervisor must determine if resources needed to effect a clean up are available on-site. Because of the close proximity of the Coral Bay to the Marina floating oil booms are readily available to be pulled out onto the water.
- If additional resources are needed the facility Fuel Supervisor identified in Appendix G will be notified. The Fuel Supervisor will contact the contractor that can provide the equipment needed.

- Safety of the clean up crew will be the top priority. Fuel can cause the following hazards; slips, fall, flammability, and eye, breathing, ingestion and skin problems.
- In all clean up operations, the priority should be given to reclaiming the fuel.
- Small quantities of spilled oil can be collected by scooping up the oil and placing it in a suitable container or absorbed with material seen in the table below.
- Large quantities of spilled oil require the same procedures only larger quantities of containment and clean up materials are needed.

Spill Containment Equipment List (see attachment G also)

Absorbent Materials	Location
Pads, commercial	Adjacent to each Generator and fuel storage tank and in weatherproof dock boxes at fueling areas
Socks, commercial	Adjacent to each Generator and fuel storage tank
Drain Covers	By each Affected Drain
Booms, commercial	In weatherproof dock boxes at fueling areas
Absorbent Granules	Buckets stationed at each Generator and fuel storage tank

3. Disposal

All collected oil and contaminated materials will be retained in or on one of the following until disposal can be arranged:

- In a leak proof suitable container (with the lid in place) if there is any free flowing liquid.
- Bulk materials, as long as there is not fee flowing liquid, can be placed on plastic sheets and covered with plastic sheeting or protected from rain.
- Mark the container or pile, as “reclaimed fuel material do not disturb”,
- The FRC will determine the correct way to properly dispose of the material.

B. COUNTERMEASURES AND SPECIFIC PROCEDURES

1. Drainage of Diked Fuel Oil Storage Areas

All of the generators on site have double walled storage tanks with internal fuel leak detection sensors. Therefore the secondary containment is not subject to impact by rainfall and no drainage is required.

The secondary containment system for the above ground fuel tanks may collect rainwater. An accumulation of precipitation in the secondary containment area shall be examined for a visible sheen of oil. If a sheen exists, absorbent materials shall be used to remove the visible oil.

2. Fuel Storage Tanks

For refueling operations, the supervisor in charge of the refueling of the storage tanks is issued a “Refueling Log”. The Fuel Dispatcher advises the Fuel Supervisor when the quantity and type of fuel is expected and specifies how the tanks are to be filled as well as all other activities pertinent to the fuel transfer.

A “Declaration of Inspection Prior to Fuel Transfer” form is to be prepared by the Fuel Dispatcher in conjunction with the “Person in Charge of the Delivery Unit”. All items on the checklist must be satisfied and signed off prior to the unloading.

Before unloading commences, the Fuel Dispatcher lines up the valves at the tanks and headers in accordance with instructions on the Refueling Log. Fuel lines between the tanks and truck are carefully checked for signs of leakage or damage. When the hose is connected and inspected, the valve is opened and unloading commences. One person remains on duty at or near the truck while the valve head is open. It is their duty to ensure that the supplier’s pumps are secured and the valve is closed if the unloading hose fails, a spill occurs or from any other condition relayed to them from the Marina or from other members of the refueling team

Immediately following the completion of pumping, the tank fill valves, line valves and pier valves are closed and locked. The Fuel Dispatcher in charge of refueling advises the Fuel Supervisor of completion, checks all refueled tanks. The Refueling Log and the “Declaration of Inspection Prior to Fuel Transfer” are completed, signed and submitted to the Fuel Supervisor.

Prior to filling the gasoline tank the drains within the containment area must be covered with the drain covers and the Fuel Supervisor must be on hand watching the gauge to prevent overfills.

3. Emergency Response

Follow Section 2: Containing a discharge if oil product spills during refueling

- End -

APPENDIX G

EMERGENCY CONTACT INFORMATION

EMERGENCY CONTACT INFORMATION

A. MARINA CONTACTS

The Marina has designated the following persons accountable for fuel discharge prevention. This position reports to the General Manager

TO BE ADDED WHEN POSITION FILLED

B. CONTACT INFORMATION FOR FACILITY OIL EMERGENCY COORDINATORS

Facility Response Coordinator (FRC):

TO BE ADDED WHEN POSITION FILLED

Alternates:

C. OUTSIDE CONTACT INFORMATION

Police Department	911
Fire Department	911
Health Department	911
VI Territorial Emergency Management Agency	(340) 774-2244
Department of Environmental Protection (DEP)	(340) 774-3320
Local DEP	(340) 774-3320
National Response Center	(800) 424-8802

D. CLEANUP CONTRACTORS

24 Hour Contractor

Marine Spill Response Corporation MSRC
HOVENSA Refinery, Limetree Bay
St. Croix, U.S. Virgin Islands

(703) 326-5617

APPENDIX H

INSPECTION PROCEDURES
AND INSPECTION LOGS

INSPECTION PROCEDURES
AND INSPECTION LOGS

A. FUEL STORAGE TANKS

1. Inspection of exterior surfaces of tanks, pipes, valves and other equipment for leaks and maintenance deficiencies.
2. Identify cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank or tank insulation, malfunctioning equipment and structural and foundation weaknesses.
3. Inspect and monitor all leak detection systems, cathodic protection monitoring equipment, or other monitoring or warning systems that may be in place at the facility.

Facility Registration Number_____

Tank Number or secondary containment or pipeline, etc.:_____

Date of Inspection	Results of Inspection (Include any need for repair)	Inspector's Signature*

* Inspector certifies that the inspection has been performed in a manner consistent with federal, state and local regulations.

Date, Address, Name, Telephone of Inspector etc:

CONTAINER VISUAL INSPECTION LOG

(see instructions over page)

Day:_____ Inspected by:_____ Signature:_____
(print name)

1	2	3	4	5	6	7	8	9	10
#	Container # and name[1]	Leaks	Seams	Gaskets	Valves	Piping	Rivets	Contain.	General Condition of Container & the Area and General Remarks
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									

[1] Container #s and container names should be the same as used in Appendix E.

Instructions for completing the Visual Inspection Form

- In Column 3 through 9 a check mark should be entered if there are no problems. If there is a problem place a “P” in the column and identify the problem in Column 10.
- In Column 9 if there is water in the containment that needs to be removed place the word “Water” in the column.

Note: Columns 1 & 2 should be completed so they become a part of the form.

Note: As a suggestion, rate the possibility that a release from the container could cause a harmful condition and the possibility of a release occurring. If the possibility of both is low you may want to consider inspection on a weekly inspection frequency. If the possibility is high you may want to consider a daily inspection frequency.

B. INSPECTION OF SECONDARY CONTAINMENT

A form for recording the drainage, bypassing and oil removal from tank secondary containments is provided on the following page.

INSPECTION LOG

DRAINAGE, BYPASSING, AND FUEL REMOVAL FROM SECONDAY CONTAINMENT

Tank No. _____

Date of Drainage	Date of bypassing Open Closed	Date of Inspection	Volume of Oil Removed	Remarks	Inspector's Signature

APPENDIX I

PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

Personnel within the Engineering and Loss Prevention Departments of the Marina have been trained to increase the readiness for oil spill prevention, control, and cleanup.

In addition, in-house table-top exercises are conducted on a quarterly basis covering the following topics:

1. Theory and practice of Fuel spill response
2. Estimating the Quantity of the Spilled Product.
3. Complying with current legislation.
4. Controlling discharge scenarios (system isolation).
5. Handling of containment booms.
6. Recovery and treatment of fuel spills.
7. Skimming of fuel.
8. Discussion on maintenance of equipment.

Further, evaluations are conducted on the personnel directly responsible for the fuel activities and the fuel systems, on a regular basis.

APPENDIX J

VI ENVIRONEMTAL STATUTES

APPENDIX K

MANAGEMENT APPROVAL

MANAGEMENT APPROVAL

The attached Spill Prevention, Control and Countermeasures Plan (SPCC) has been prepared to meet the requirements of 40 CFR Part 112, revised 67 FR 47140, July 17, 2002, as amended at 71 FR 77290, Dec. 26, 2006; 73 FR 74300, Dec. 5, 2008; 74 FR 58809, Nov. 13, 2009 and will be implemented as described.

Signature_____ Date_____

Printed Name_____

Printed Title_____

APPENDIX L

ENGINEER CERTIFICATION