SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PORT OF GALVESTON
SHOPS FACILITY

Prepared for:

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1.0 Plan Introduction Elements

1.1 Purpose and Scope of Plan Coverage

The specific guidelines presented in this Spill Prevention, Control and Countermeasure Plan have been carefully thought out and prepared in accordance with safe practices. This plan has the full approval of management at a level with authority to commit the necessary resources to implement this plan.

The Port of Galveston (Port), pursuant to 40 CFR 112 hereby establishes a Spill Prevention Control and Countermeasure Plan (herein referred to as the SPCC Plan), which shall be maintained at this site. The management acknowledges its responsibility to its neighbors, employees, and the community to take all reasonable steps necessary to prevent spills from its facility in order to protect human health and the environment. If despite all reasonable efforts, a spill does occur, then the representatives of the Port will take all necessary steps as outlined in the SPCC plan to minimize the impact of such a spill.

The SPCC plan is a working document designed to be a tool used regularly to prevent and minimize spills. As such, the Port shall see that its agents and employees are properly informed of the provisions of the SPCC plan and know their role in maintaining the SPCC plan or in minimizing spills that occur. The Port is committed to providing the necessary resources to establish and maintain the prevention and countermeasures practices set forth herein.

1.2 Regulatory Applicability

This plan was written to comply with the following:

US Environmental Protection Agency

40 CFR 112.7 – Spill Prevention Control and Countermeasures Plan (SPCC)

The facility is subject to this regulation based on one or more of the following criteria:

1. The non-transportation related facility is engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, and due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, into or upon the navigable waters of the United States
2. The aggregate above-ground oil storage capacity, including all containers of 55-gallon capacity or greater, is 1,320 gallons or more

1.3 Plan Review and Revision

EPA – SPCC

This plan will be reviewed, evaluated, and updated at least every five (5) years. Plan revision will be documented in the Revision Record included as **Table 1**. Completion of the review and evaluation will be documented, and the following statement will be signed at the beginning or end of the plan or in a log or an appendix to the plan:

“I have completed review and evaluation of the SPCC Plan for the Porr of Galveston Shops Facility, Galveston, Texas on _____ (date), and (will / will not) amend the plan as a result.”

The plan will be amended within six (6) months of the review to include any change in the facility's design, construction, operation, or maintenance that materially affects the potential for an oil spill. Examples of facility modifications that would necessitate amendment of the plan include:

- The addition or removal of any oil storage tanks

- A change in spill control technology

- A change in service status of tanks, or other equipment

- The modification or addition of dikes or other containment structures

- A change in the methodology, frequency, or record keeping of equipment inspections

- Other significant changes

The amendment will also include 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. Amendments will be incorporated into the plan and then the entire plan will be recertified by a Licensed Professional Engineer. Plan revision will be documented in the Revision Record included as **Table 1**. Amendments will be implemented as soon as possible, but no later than six (6) months following the preparation of any amendment.

Table 1
Revision Record

Change Number	Change Dates	Description of Change

I, **Laura Camcioglu** (SPCC plan administrator), have completed the review and evaluation of the Spill Prevention, Control and Countermeasure Plan for the Port of Galveston on _____ (date), and will / will not amend the plan as a result.

Signature:_____

1.4 Management Certification

The Port of Galveston has developed this SPCC plan to prevent and/or control the spills of oil or hazardous substances. The Port of Galveston herein commits the necessary resources to fully prepare and implement this plan and has obtained through contract the necessary private personnel, equipment and materials to respond, to the maximum extent practicable, to a worst-case discharge or substantial threat of such a discharge. The person in our organization who is accountable for discharge prevention and who reports to Port of Galveston Senior Management is **Laura Camcioglu** (Director of Special Projects) and can be reached at **(409) 766.618.**

Laura Camcioglu

Certifying Representative (Print)

Director of Special Projects

Title

Signature

Date

1.5 Registered Engineer Certification

This Certification is required under 40 CFR 112 “Spill Prevention Control and Countermeasure Plan Regulations,” and is applicable to the Port of Galveston Shops facility in Galveston, Texas.

I hereby certify that I have reviewed the Spill Prevention Control and Countermeasure Plan for the Port of Galveston facility and attest that, at the time of certification:

1) I am familiar with the provisions of 40 CFR 112.
2) I have examined this plan and facility details; and the facility has been visited by Nikki Loya of SNM2R.
3) This plan has been prepared in accordance with good engineering practice including consideration of applicable industry standards and with the requirements of 40 CFR Chapter 1, Part 112.
4) Procedures for required inspections and testing have been established; and
5) The plan is adequate for the facility.

This certification does in no way relieve Port of Galveston of their duty to prepare and fully implement this plan in accordance with 40 CFR Chapter 1, Part 112.

Timothy L. Craft, P.E.
Printed Name

Signature

Texas
State of Professional Registry

72725
License Number

Date: 10/15/2024

2.0 Information Summary

40 CFR 112.7

Facility Owner	Port of Galveston 123 25th St Galveston, TX 77550
Facility Operator	Port of Galveston 123 25th St Galveston, TX 77550
Facility Contacts	Laura Camcioglu Director Special Projects (409) 766.6183 Kenneth Keleman Maintenance Supervisor (409) 739-1316 Bennette Gonzales Shop Foreman (409) 457-1145
Facility Location	Latitude: 29.303213° N Longitude: 94.815079° W

2.1 Facility Operations

40 CFR 112.7.a.3

The Port of Galveston Shops (facility) are used to perform maintenance and repair services for vehicles and equipment operated at the facility. The facility handles, stores, and uses various petroleum products including gasoline and diesel fuels and lubricants. The facility receives products by common carrier, such as tanker trucks. The facility refuels its generator sets from above ground storage tanks. Hours of operation are between 8:00 AM and 5:00 PM, 5 days per week.

The Site Map included as Figure 3 in Appendix A of this Plan shows the layout of the facility including the location of shops, of oil containers, and transfer areas.

This facility is located at 4200 Port Industrial Road at the Port of Galveston Wharves as indicated on Figures 1. The shops facility is approximately 50,000 square feet in size, and is located north of Port Industrial Rd and south of Pier 39 and Pier 40.

The facility contains offices and two shops. The facility contains one trailer-mounted 1,000-gallon two-compartment tank containing 500-gallons of diesel and 500-gallons of gasoline and is stored in a fuel shed. Located in the shops are: two 375-gallon used oil totes; two 230-gallon new oil totes; and multiple 55-gallon drums containing oil products, oil waste, and non-oil waste. Spill kits are also located in oil storage areas as indicated on Figure 3. The facility site is mainly concrete paved and several areas situated on the property are used for parking/storage.

2.2 Facility Storage

40 CFR 112.7.A.3.i-iii

Oil storage at the facility consists of five (5) portable ASTs. The facility also stores a varying stock of oil drums and non-hazardous waste drums on secondary containment pallets. Table 2 provides a listing of facility containers. The capacities of the containers present at the site are listed below and are also indicated on the Facility Diagram in Figures 3. Containers with capacity of 55 gallons or more are included.

Table 2
Above Ground Storage

Material	Material of Construction/ Discharge Prevention Measure	Process	Type of Storage Container	Maximum Quantity (Gallons) Stored On-Site (approximate)	Location Identification on Figures
Oil Storage – Portable					
Diesel & Gasoline	Trailer-Mounted Steel/ Gauging of tank prior, during, and after filling, visual inspection	Maintenance	Double-Wall - Two Compartment Tank (Stored Covered)	500 (each compartment) = 1,000	Figure 3, Location 1
Used Oil	Poly/ Gauging of tank prior, during, and after filling, visual inspection	Maintenance	Single-wall tank (Inside Shop)	2 x 375 = 750	Figure 3, Location 2
New Motor Oil	Poly/ Gauging of tank prior, during, and after filling, visual inspection	Maintenance	Single-wall tank (Inside Shop)	2 X 230 = 460	Figure 3. Location 3
Hydraulic Oil	Steel / Visual inspection, on pallet, spaced for observation	Maintenance	55-gallon drums (Inside Shop)	7 x 55 = 385	Figure 3. Location 4
New Motor Oil	Steel / Visual inspection, on pallet, spaced for observation	Maintenance	55-gallon drums (Inside Shop)	55	Figure 3. Location 4
Used Oil Filters	Steel / Visual inspection	Maintenance	55-gallon drum (Inside Shop)	55	Figure 3. Location 4
Used Oily Rags	Steel / Visual inspection	Maintenance	55-gallon drum (Inside Shop)	55	Figure 3. Location 5
Non-Oil Storage - Drums					
Used Antifreeze	Steel / Visual inspection, on pallet, spaced for observation	Maintenance	55-gallon drum (Inside Shop)	55	Figure 3, Location 4
Other Oil Storage (Container Volume <55-gallon Threshold)					
Integrated Generator Diesel Tanks	Steel - Gauging of tank prior, during, and after filling, visual inspection	Emergency Use	Single-Wall - no containment	34 x 4 = 136 (not included in facility capacity)	Figure 2 Locations 3-6
			Total Oil Storage (gallons)	**2,760**	
			Total Non-Oil Storage (gallons)	**55**	

There are no underground storage tanks at this facility. The facility generally has a rolling stock of less than twenty 55-gallon drums for the storage of oil or oil-related products. Each drum is stored on a containment pallet and is clearly labeled with the drum contents. The drum areas are inspected monthly during the tank inspections. Each of these containment areas are inspected once per month for leaks.

2.3 Contact List for Facility Response

40 CFR 112.7.a.3.vi

The contact list utilized will depend on the nature of the spill. An employee observing a spill at the facility will notify any one of the personnel from the Spill Management Team below immediately:

Laura Camcioglu
Director Special Projects
(409) 766.6183

Kenneth Keleman
Maintenance Supervisor
(409) 739-1316

Bennette Gonzales
Shop Foreman
(409) 457-1145

Releases within containment are not considered reportable until they are discharged to the environment. Releases within the containment will be internally reported to ensure that there is no hazard created to personnel, to ensure that the problem leading to the spill is corrected, and to promote awareness for future prevention measures.

After assessing the situation, the facility contact will immediately notify the following agencies if the spill is considered a reportable spill:

Name **Galveston Fire Department - 911**

The Galveston Fire Department will respond immediately, and Port is responsible for notification to the National Response Center (NRC) (1.800.424.8802) and to the Texas Commission on Environmental Quality (TCEQ) (1.800.832.8224). The Port is also responsible for containment and clean- up of the spill.

2.4 EPA Discharge Volume Calculations

Worst-Case Discharge

A procedure for determining worst-case discharge planning volume for onshore storage, *Secondary Containment—Multiple-Tank Facilities* has been defined by the EPA in 40 CFR 112. The worst-case scenario for this area would be a full release from the **500-gallon** gasoline or diesel AST compartment.

Medium Discharge

A medium discharge is defined by 40 CFR as having a maximum volume of 36,000 gallons of oil or 10 percent of the worst-case discharge, whichever is less. The medium scenario is considered to be a full release of the **320-gallon** waste oil tote.

Small Discharge

A small discharge is defined by 40 CFR as any volume less than or equal to 2,100 gallons, but not to exceed the calculated worst-case discharge volume. A small discharge would the full release of one **55 gallon** drum of oil.

Emergency Response Equipment

2.4.1 Communications Equipment

Cellular phones, land-based phones and land/mobile radio communication systems will be utilized in case of an emergency.

2.4.2 Oil Spill Response Equipment

The operator owns and maintains oil spill kits located in the maintenance shops.

2.4.3 Firefighting Equipment

The operator maintains fire extinguishers throughout the facilities.

3.0 Countermeasures

40 CFR 112.7A.3.iv

Spill control equipment on site includes absorbent pads and booms, granular absorbent, empty drums, brooms, and shovels. Spill equipment is stored in marked drums at the Shop oil-storage areas as indicated on Figure 3.

Tank valves and connections are inspected monthly, and leaks corrected immediately. Oil leaks and spills are cleaned up as soon as possible using oil absorbent sheets or other materials. Water is not used to cleanup spilled oil. If oil builds up within the secondary containment (including containment pallets under the 55-gallon drums) the oil will be absorbed using the oil absorbent sheets as soon as possible. If storm water is present, the water will be visually inspected for an oily sheen. Oil floating on the surface is to be carefully removed using oil absorbent sheets or other appropriate materials. If an oily sheen is observed, storm water will be recovered for offsite treatment using a vacuum truck or other means.

Spilled oil and oil-soaked materials are placed in 55-gallon drums for disposal. If a large quantity of liquid (oil, gasoline, or diesel) is spilled which cannot be handled by on site spill containment and clean up methods, the oily waste hauler, Holcomb Oil Recycling – (713) 991-4005 will be called to respond.

3.1 Discharge Response Scenario

40 CFR 112.4
40 CFR 112.7.a.4
40 CFR 112.7.a.5

The spill reporting procedures will depend on the nature of the spill. All spills will be immediately reported to the facility contact. The facility contact will determine if the release has triggered the release reporting requirements and will conduct any further reporting.

There have been no reportable spills at the facility in the past ten (10) years.

The applicable reportable quantities, as cited by 30 TAC 327.4 and 40 CFR 203.4, are provided below:

Liquid	Reportable Quantity
Gasoline, Diesel, Motor Oil, Used Oil	**To Water:** Any amount that produces a sheen on water **To Land:** 25 gallons

Releases within the containment are not considered reportable until they are discharged to the environment. Releases within the containment will be internally reported to ensure that the problem leading to the spill is corrected and to promote awareness for future prevention measures.

Provide the following information when reporting a discharge:

1. the exact address or location and phone number of the facility;
2. the type of material discharged;

3. estimates of the total quantity discharged;
4. the source of the discharge;
6. a description of all affected media;
7. the cause of the discharge;
8. any damages or injuries caused by the discharge;
9. actions being used to stop, remove, and mitigate the effects of the discharge;
10. whether an evacuation may be needed; and,
11. the names of individuals and/or organizations who will be contacted.

Note: If the facility discharges more than 42 gallons of oil (diesel/gasoline/motor oil, etc.) in each of two (2) discharges within any twelve (12) month period, then the EPA must be notified.

The worst-case discharge at the facility would involve the structural failure of the 3,000-gallon diesel tank with the drain valve on the secondary containment inadvertently left open. The discoverer of the spill would immediately do the following:

1) Immediately stop the source of the release, if safe to do so. In this case, close the secondary containment drain valve to contain the spilled fuel.
2) Call a member of the Spill Management Team
3) Call the Galveston Fire Department, if warranted
4) Keep all people and equipment clear of the spilled material
5) Contact the National Response Center (includes notification to both EPA and USCG)
6) Call the State Emergency Response Commission (includes notification to TCEQ)
7) Contact the USCG Houston Galveston Sector

It is the Port's responsibility to determine if all the needed agency notifications were completed. If not, then the Port should complete the notification as soon as praticable.

3.2 Oil Spill Contractor

In the event facility personnel are not able to handle the response and cleanup work for a spill, Garner Environmental is available at (800) 424-1716 on call 24/7 to assist.

3.3 Overfill Prevention Systems

40 CFR 112.8 (c) (8)

The Diesel and Gasoline ASTs are equipped with a level site gauge. These ASTs are manually monitored using a level measuring stick.

3.4 Effluent Treatment Facilities

40 CFR 112.8 (c) (9)

The facility is not equipped with a vehicle or equipment washdown area.

3.5 Federal Agency Notification Requirements

A member of the Port Spill Management Team will notify the federal and state agencies within the first 24-hour period following the release. It is the Port's responsibility to ascertain whether or not all necessary agency notification was completed after a spill. Agencies will be notified in the order established in this section.

National Response Center (NRC) (800) 424-8802

The NRC is the clearinghouse for all USCG, EPA, and USDOT oil and chemical spill notifications. Placing a call to the NRC satisfies the notification requirements for each of these agencies. Immediate notification (less than one hour) is required for all discharges of oil sufficient to produce a sheen into navigable waters of the United States, and for all chemical releases in excess of the reportable quantities listed in 40 CFR 302.4. Below are the reporting requirements for each agency,

along with the agency's telephone number. It is recommended that a courtesy call be placed to the appropriate agency in order to establish proper lines of communication.

Environmental Protection Agency (EPA) Region 6 (866) 372-7745

The EPA must be notified through the NRC for all chemical releases (to air, land, or water) deemed reportable by 40 CFR 302.4 and oil discharges into inland navigable waters of the U.S. sufficient to create sheen. A written report is not required.

If the facility has discharge more than 1,000 gallons of oil in a single discharge or more than 42 gallons of oil in each of two discharges occurring within any twelve month period, the following must be submitted to EPA within 60 days: name of facility; name of reporting party; location of facility; maximum storage or handling of the facility and normal daily throughput; corrective action and countermeasures that have been taken, including a description of equipment repairs and replacements; adequate description of the facility, including maps, flow diagrams, and topographical maps; the cause of such discharge as including a failure analysis of the system or subsystem in which the failure occurred, additional preventive measures that have been taken or contemplated to minimize the possibility of recurrence and such other information as the EPA may reasonably require pertinent to the Plan or discharge.

United States Coast Guard—Houston Galveston Sector (281) 464-4863

The USCG must be notified via the NRC for all chemical releases (to air, land or water) deemed reportable by 40 CFR 302.4 and oil discharges into coastal navigable waters of the U.S. sufficient to create sheen. A written report is not required.

3.6 State Agency Notification Requirements

A member from the Port's Spill Management Team will make initial and follow-up state agency notifications. Coordination will take place among the groups listed within this section.

Texas General Land Office (800) 832-8224

The Texas General Land Office (TGLO) must be notified within one hour of any unauthorized discharge on any waters or land adjacent to coastal waters where harmful quantities of oil may enter coastal waters or threaten to enter coastal waters of the state of Texas.

Texas Commission on Environmental Quality (800) 832-8224

The Texas Commission on Environmental Quality (TCEQ) must be notified within 24 hours of any spill which could have the potential to adversely affect human health or the environment.

Any amount of material other than oil spilled to waters of the state which has the potential to alter and/or degrade water quality must be reported to the TCEQ. Reportable quantities are set forth in 40 CFR 302.4. The TCEQ reportable quantity (RQ) for spills on land of oil is 25 gallons. A leak of any size, no matter how small, must be reported if surface and/or ground water quality is affected. Notification after hours of the TCEQ is handled through reporting to the TGLO's Environmental Hotline.

3.7 Local Agency Notification

A member from the Port's Spill Management Team will make initial and follow-up local agency notifications to the following Local Emergency Planning Committee (LEPC):

Galveston County LEPC (281) 309-5002

Galveston Office of Emergency Management (409) 765-3710

3.8 Methods of Spilled Oil Disposal

40 CFR 112.7.a.3.v

Spilled oil and oil-soaked materials will be appropriately disposed by contracted used oily waste hauler (Holcomb Oil Recycling – (713) 991-4005) after the used spill materials have been contained. Spilled oil and cleanup material will be managed in accordance with the applicable requirements regulating hazardous waste and will not be disposed of in dumpsters or trashcans.

If a very large spill occurs, or if oil has the potential for flowing out of the secondary containment area, the Galveston Fire Department (911) and/or Garner Environmental at (800) 424-1716 will be called immediately. The responder will be given as much information as possible on the spill when occurred. The responder will provide special oil clean up equipment and supplies and a highly trained cleanup crew as a measure of first response. It is Port's responsibility to follow-up the first response with their own contracted Oil Spill Contractor to complete the major long run cleanup.

4.0 Prediction of Equipment Failure

40 CFR 112.7.b

Spills may occur from the bulk storage tanks. The tanks were evaluated to determine the potential oil spill volume from each. The following table presents the type of failure, possible rate of flow, and direction of flow for each of the bulk storage tanks.

Table 4
Prediction of Equipment Failure

Source	Volume (gal)	Contents	Rate (gallon/hr.)	Direction of Flow	Containment
Tank 1	500	Diesel	500 gal/hr	South, then East	Yes
Tank 1	500	Gasoline	500 gal/hr	South, then East	Yes
Tank 2	375	Used Oil	375 gal/hr	N/A (in shop)	No
Tank 3	230	New Oil	230 gal/hr	N/A (in shop)	No
Drums	55	Misc. Oil	55 gal/hr	N/A (in shop)	Yes

The 500-gallon diesel tank, the 500-gallon gasoline tank, the 375-gallon used oil totes, and the 230-gallon new oil totes are the only tanks with the potential to have a discharge reach beyond the facility's property boundary. The tanks could potentially discharge diesel, gasoline, or new/used oil during a loading/unloading malfunction spilling product to the Galveston Channel if cleanup or diversionary measures were not taken.

5.0 Secondary Containment and Calculations

40 CFR 112.7.c

Open secondary containment must be designed to account for the entire contents of each tank plus sufficient freeboard to allow for precipitation (i.e., at least the capacity of the single largest tank within each containment area plus a 25-year frequency, 24-hour duration rainfall amount). Each containment is constructed of materials that are sufficiently impervious to contain spilled liquids. If required, drainage of accumulated storm water from containment areas is inspected prior to removal to ensure that it satisfies applicable water quality standards. It is not anticipated that any drainage will be required due to the construction on the tanks and/or containment structures.

The double-wall diesel/gasoline tank is stored enclosed in the metal fuel shed located east of the northeast corner of the shops building to prevent entry of precipitation. The used oil and new oil totes are stored inside the shops building to prevent entry of precipitation.

Small portable oil storage containers, such as 55-gallon drums or other smaller containers are stored inside the shops building away from precipitation. Small portable oil storage containers, such as 55-gallon drums or other smaller containers are generally stored on spill pallets sized to contain the capacity of one drum.

The locations of all ASTs and other oil and non-oil storage at the facility are depicted on Figures 3 in Appendix A.

6.0 Inspections, Tests, and Records

40 CFR 112.7.e

Formal facility inspections are conducted monthly, and records of these inspections are documented and signed by the inspector. During the inspections all tanks, containment structures, valves, pipelines, and other equipment are inspected to ensure proper functioning of equipment and to identify signs of deterioration, potential leaks that might cause a spill or accumulation of liquid inside the secondary containment areas.

Inspection procedures are as follows:

1. Verify that drain valves, any other valves, and fuel pumps on all bulk tanks are securely locked in the closed position when in non-operating or non-standby status.
2. Inspect all aboveground tanks for leaks or drips.
3. Inspect rainwater within secondary containment areas prior to discharge.
4. Inspect secondary containment areas for spills during dry weather.
5. Inspect the starter control on all fuel pumps to ensure that they are locked in the “off” position when the pumps are in a non-operating status.
6. Inspect aboveground valves and tank supports.

The records must be maintained for a period of three (3) years. The checklist for these inspections can be found in Appendix B. The completed checklists will also be maintained in Appendix B

If a discharge occurs from the containment a discharge report log found in Appendix C must be completed and stored in Appendix C. The discharge report form verifies that the water was inspected and found to not have a sheen of oil prior to discharge.

Documentation of these tests will be kept with all inspection logs relating to the plan. Inspections and testing conducted in support of this Plan are documented as follows:

Table 5
Inspection Schedule

Inspection Type	Frequency
Prior to discharge from secondary containment areas	As needed
Emergency Release Form	As needed
Tank inspection	Monthly
Fuel Pumps	Monthly
Tank integrity assessment	Once every ten (10) years

6.0 Training

40 CFR 112.7.f

Personnel in the operation and maintenance of equipment and who are in contact with the bulk storage tanks are trained in the prevention of discharges, discharge procedure protocols, applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of this Plan.

All new hires are required to have spill prevention training, which includes a complete review of the Port's Shops Facility SPCC Plan. Once a year, refresher training and deployment exercises for spill response are conducted. In addition, the refresher will highlight known discharges or failures, malfunctioning equipment, and any recently developed precautionary measures.

Training records are maintained in Appendix D.

7.0 Security

40 CFR 112.7.g

The entire facility is enclosed by chain link fencing and secured gates. Gates are locked when the facility is unattended. Entrance is restricted by a Port of Galveston manned guard shack.

In accordance with regulations, the following security measures are maintained:

1. Drain valves and any other valves that will permit direct outward flow of a tank's content will be kept closed when in non-operating status.
2. The starter control on all tank pumps will be maintained in the "off" position.
3. Overhead lighting is provided for night work.

8.0 Facility Tank Car and Tank Truck Loading/Unloading Rack

40 CFR 112.7.h

Tank truck loading/unloading procedures meet minimum established Department of Transportation requirements. The loading/unloading connections of piping used to transfer diesel are capped or blind-flanged when not in service or on standby status.

The following procedures are followed to prevent discharges during fueling operations:

As required by DOT, an attendant is present during all loading or unloading events to assure compliance with applicable procedures and precautions. The attendant can be either the truck driver or Port personnel.

For tank filling, the tanks are visually gauged using a measuring stick prior to filling. The operator computes the required volume to fill the tank to a capacity at least 10% less than the effective capacity of the tank. The tank is gauged again prior to departure. The operator will not leave the tank or tank truck during filling operations.

During fueling operations, the operator remains with the truck during the entire fueling process. Drip pans are used to catch small drips and leaks that may occur during disconnect.

Prior to departure of tank trucks loading or unloading at the diesel tanks, truck drains, and valves are inspected for leakage and are, if necessary, adjusted or replaced to prevent leakage in transit. A Fueling Procedures checklist is included in Appendix C.

9.0 Facility Drainage

40 CFR 112.8.b

Storm water discharges are from the paved parking and wharf area, which flow south and east toward Port Industrial Road, and eventually the Galveston Channel. Figure 3 in Appendix A, shows the drainage patterns for stormwater runoff.
Any potential drainage from the AST containments will be restrained by the secondary containment structures and/or building structures and spill kits. Precipitation does not have the potential to accumulate within the secondary containment structures for the ASTs.

10.0 Port Oil Storage & Handling Best Management Practices

Storage

- Regularly inspect fixed and mobile tanks, transfer equipment and piping for drip marks, tank discoloration, puddles of leaked liquid, corrosion, localized dead vegetation, and stains on the ground. Inspect for leaks/seepage from valves and seals or deformities such as bulges, cracks, and bends in pipes and tanks;
- Regularly inspect secondary containment structures for cracks, discoloration, corrosion, erosion of inside walls and the outside structure of tanks. Inspect for valve leaks, loose mortar, sealer, sizing, or grouting used to construct containment walls, for the presence of leaked or spilled material within the containment area and debris within the containment area;
- Periodically conduct integrity testing of above ground storage tanks and leak testing of valves and piping;
- Ensure that secondary containment areas hold the volume of the largest storage container as well as sufficient room for precipitation;
- Inspect and record inspection results of stormwater released from any drainage system in the bulk tank storage area directly to waterways;
- Regularly inspect and test liquid level sensing devices and audible alarms on each storage tank to ensure proper operation;
- Inspect valves that permit the outward flow of tank or secondary containment contents to ensure that they will remain closed when not operating;
- If required by the Port, prepare a spill prevention and emergency response plan for the facility and all storage/transfer operations, and submit it to the Operations Division of the Port for approval;
- Provide initial and follow-up training to employees responsible for facility operations and for emergency spill response;
- Locate spill clean-up materials and equipment in known and convenient locations for emergency access.

Transfer - Loading & Unloading

- Inspect starter controls for pumps within secondary containment to ensure that they will remain locked in “off” position when not operating;
- Inspect loading/unloading connections of pipelines to ensure that they are securely capped or blank flanged when not in service;
- Inspect valves and valve operation, piping, flange joints, expansion joints, valve glands, catch pans, pipeline supports and metal surfaces;
- Ensure that the loading/unloading area drains to a catchment basin or other similar containment structure; the capacity of the containment structure must be
- equivalent to the largest compartment of a tank car or truck loaded/unloaded;

- As applicable, use physical barriers, warning signs, wheel chocks or vehicle brake interlock systems to prevent tank cars/trucks from departing before complete disconnection of transfer lines;
- Inspect drains and outlets on tank cars/trucks prior to filling and departure and tighten, adjust, or replace as necessary;
- Use pans or containers to catch drips/spills when making or breaking connections with hoses, nozzles, or other transfer equipment;
- Ensure that buried piping has protective wrapping or coating and is protected or otherwise meets corrosion protection requirements;
- Install and maintain vapor recovery systems for product transfer to bulk tanks;
- Ensure that transfers are supervised by facility employees who are thoroughly familiar with normal and emergency operations procedures.

Galveston Wharves has implemented the following Best Practices for our activities in order to reduce or prevent water and land pollution.

Activity	**Best Practices**
Perform vehicle and machinery fueling, lubrication and maintenance at a minimum distance of 30 m (100 ft) from the water and at a minimum distance of 15 m (50 ft) from a tributary (catch basin, ditch, etc.).	Warehouse is located greater than 100 feet from the dock face. Fueling Equipment requires the operator to be at least 100 feet away from the water.
Implement inspection and maintenance procedures for all devices and equipment that could potentially leak (tanks, generating sets, compressors, etc.).	Galveston Wharves Construction and Maintenance Department requires each use inspections and specific maintenance tasks to be performed on a regular schedule for all devices and equipment that could potentially leak. .
Regularly inspect near shore water and property to identify and immediately stop leaks from any source.	Galveston Wharves Police Department and Construction and Maintenance Department are involved in regular inspections of the site. In addition, Supervisors conduct visual inspections of the dock face and water daily.
Should there be any doubt about the environmental quality of runoff water collected in an observation shaft or excavation pit (color, odor), such water is to be intercepted for sampling purposes or proper treatment.	Galveston Wharves has established a relationship with a licensed environmental waste disposal company who is called to remove any potentially contaminated water. Our oil/water separators and catch basins are cleaned out at least once a year, or more frequently if needed.
Have available at least one emergency spill kit on site for dealing with minor spills.	Galveston Wharves has 3 large spill kits that are stored in the Warehouse. These can be transported by forklift around the dockyard as required. In addition, absorbent pads and pellets are available.
Train employees to respond to small spills	Mechanics and Foreman advised on the use of spill kits. These individuals would be responding to a spill from a piece of equipment, along with an experienced mechanic.

Galveston Wharves has identified potential pollution sources and the associated pollutants resulting from our main maintenance and operational activities. Galveston Wharves strives to reduce the amount of pollution generated and adopt pollution prevention measures. The following lists the possible sources of land and water pollution, types of pollutants and the controls to prevent pollution.

Activity	Possible Sources of Pollution	Types of Pollutants	Pollution Prevention Measures
Maintenance	Spills or leaks of hazardous products used during vehicle maintenance and repair in shops	• Oils/lubricants/paints/sol vents (petroleum hydrocarbons) • Anti-freeze (glycol) • Battery acid	• Mechanic Training • Spill kits with drain covers available to minimize spill impacts
Maintenance	Spills or leaks of hazardous products in Waste Storage Compound by Diesel Shop	• Oils/lubricants/paints / solvents (petroleum hydrocarbons) • Anti-freeze (glycol) • Battery acid	• Signage indicating proper requirements at compound • Drainage area protected by oil/water separator • Discharge from oil/water separator can be stopped by turning valve that is clearly marked • Spill kits with drain covers available to minimize spill impacts
Operations	Spills or leaks of hazardous products from operational equipment	• Oil/lubricants/fuel (petroleum hydrocarbons)	• Galveston Wharves Equipment PM Program minimizes chances of spills and leaks form equipment
Operations	Spills from bulk filling of fuel truck, underground and aboveground fuel and oil storage tanks.	• Fuel (petroleum hydrocarbons)	• Employee training • Galveston Wharves has a mobile emergency response vehicle
Operations	Spills from fueling of site vehicles and equipment, including locomotive	• Fuel (petroleum hydrocarbons)	• Fueling Equipment requires operator to be at least 100 feet away from the water.
Operations	Spills/fires of Dangerous Cargo stored in transport containers	• Possible toxic air contaminants, runoff residues	• Designated area in dockyard for Dangerous Goods shipping containers • Galveston Wharves has a mobile emergency response vehicle

11.0 Certification of the Applicability of the Substantial Harm Criteria

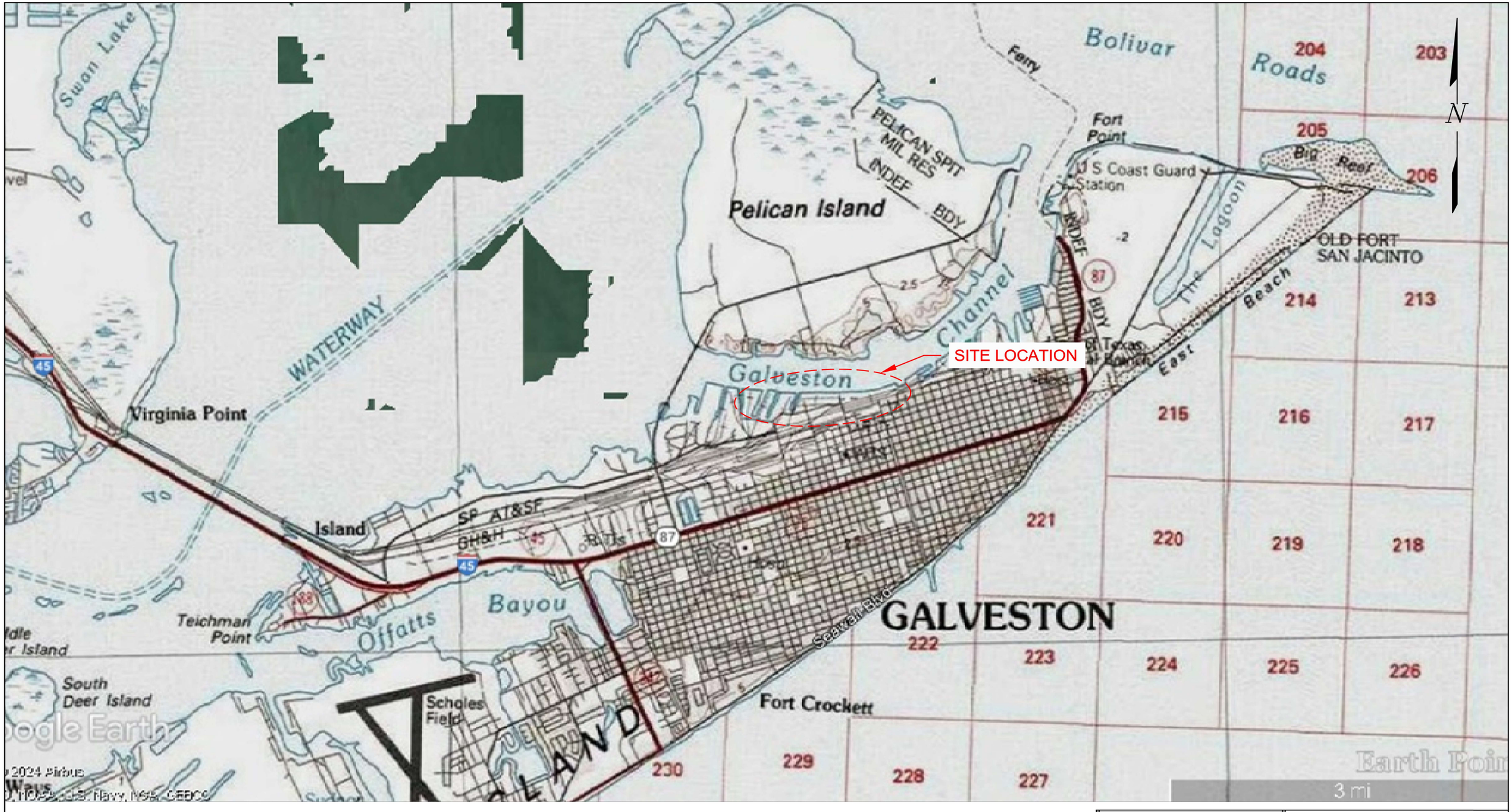
40 CFR 112

This facility does not transfer oil over water to or from vessels and does not have an oil storage capacity greater than or equal to 42,000 gallons; therefore, the facility does not meet the requirements to pose Substantial Harm. The completed checklist for the certification of the applicability of the Substantial Harm Criteria, as specified in Appendix E of Part 112 is provided in Appendix E of this plan.

APPENDICES

APPENDIX A

Site Maps



4,000 0 2,000 4,000 8,000

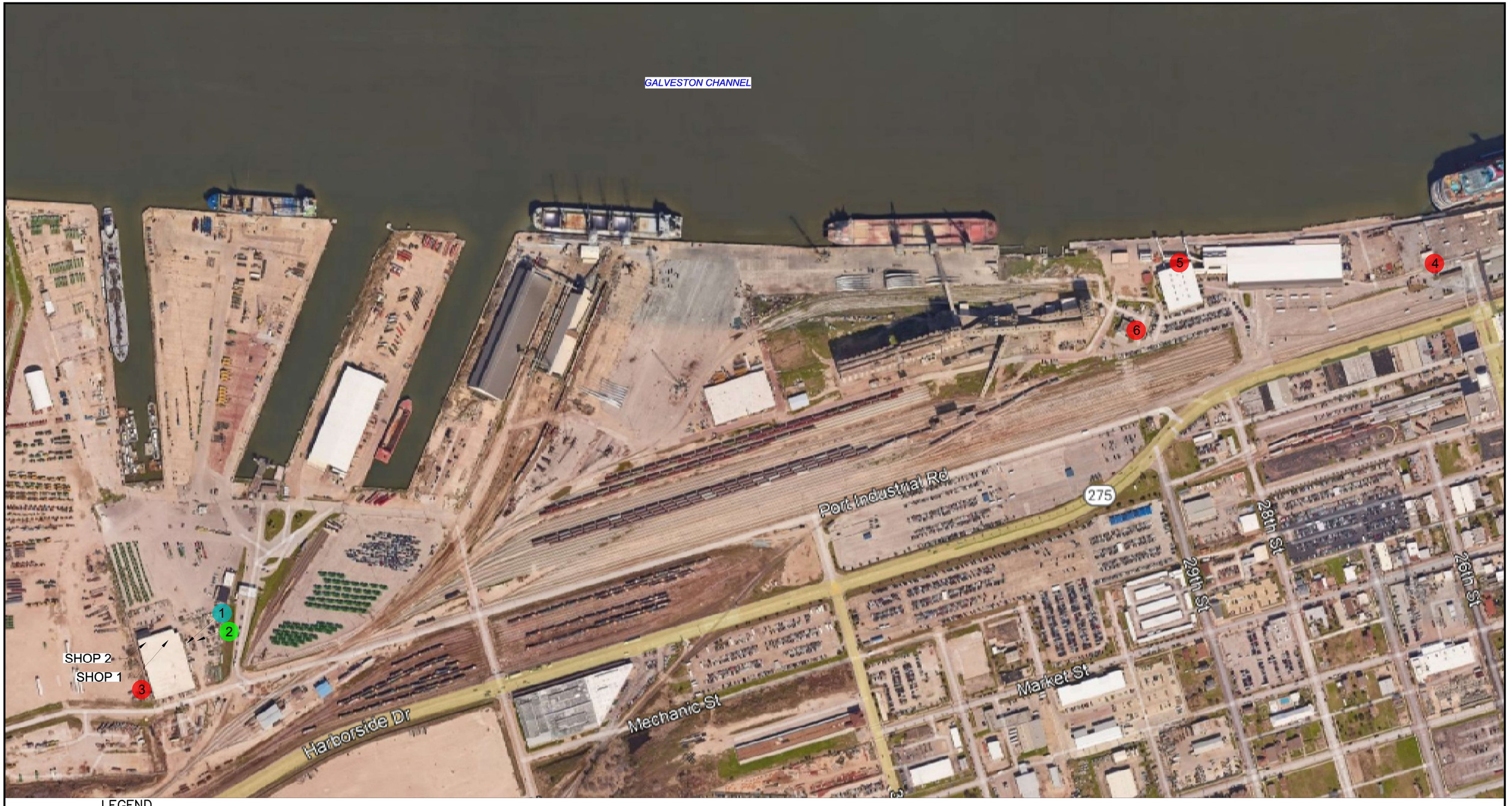
SCALE (Feet)

FIGURE 1

SITE LOCATION MAP

PORT OF GALVESTON
MAINTENANCE SHOPS

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN



LEGEND

1 FUEL SHED
2 MSGP SAMPLING DRAIN
3 SHOP GENERATOR
4 CT–1 GENERATOR
5 CT–2 GENERATOR
6 POLICE GENERATOR

400 0 200 400 800

SCALE (Feet)

N

FIGURE 2

SITE MAP

PORT OF GALVESTON
MAINTENANCE SHOPS

SPILL PREVENTION CONTROL AND
COUNTERMEASURE (SPCC) PLAN

LEGEND

1. 1,000–GALLON TWO COMPARTMENT FUEL TANK TRAILER (500 GALLONS DIESEL & 500 GALLONS GASOLINE – COVERED)
2. 375–GALLON USED OIL TOTE (COVERED)
3. 230–GALLON NEW ENGINE OIL TOTE (COVERED)

ADDITIONAL INDOOR OIL STORAGE

4. 7 – 55–GALLON DRUMS HYDRAULIC OIL
   1 – 55 GALLON DRUM ENGINE OIL
   1 – 55 GALLON DRUMS USED OIL FILTERS
5. 1 – 55–GALLON DRUM USED OILY RAGS

DRAINAGE DIRECTION

S SPILL KIT

Note: Generator fuel tank capacities are <55 gallons and are therefore not included in the SPCC inventory. In addition, antifreeze is not considered to be oil and is also excluded from the SPCC inventory.

N

80 0 40 80 160

SCALE (Feet)

FIGURE 3

OIL STORAGE LOCATION MAP

PORT OF GALVESTON MAINTENANCE SHOPS

SPILL PREVENTION CONTROL AND COUNTERMEASURE (SPCC) PLAN

APPENDIX B

Monthly Facility Inspection Checklists

GALVESTON WHARVES

Instructions: Complete form Monthly. Maintain the original on site in Appendix B of the SPCC Plan. Additional information can be included on the back or extra sheet.

SHOP	1,000 gallon Diesel/Gasoline Tank	375 gallon Used Oil Tote (Shop 1)	230-gallon Used Oil Tote (Shop 2)	230 gallon New Oil Tote (Shop 1)	230 gallon New Oil Tote (Shop 2)	55 Gallon Drum Oily Rags (Shop 1)	55 Gallon Drums - Oil & Filters (Shop 2)	Corrective Action
GENERAL AREA								
Clear Access	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Housekeeping (no debris or spills)	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Spill Prevention Materials (absorbent, spill kit)	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Are best management practices (BMP) adequate and in good condition? (drip pans, spill pallets)	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Compatibility of Stored Materials	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
TANKS/PIPING/HOSES/CONTAINERS								
Leakage/Spillage	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Punctures	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Cracks	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Corrosion	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Scrapes of Protective Coatings	Y N	Y N	Y N	Y N	Y N	Y N	Y N	
Overfill Prevention Controls (alarms, sec. con., spill boxes)	Y N	Y N	Y N	Y N	Y N	Y N	Y N	

GALVESTON WHARVES

Instructions: Complete form Monthly. Maintain the original on site in Appendix B of the SPCC Plan. Additional information can be included on the back or extra sheet.

SHOP	1,000 gallon Diesel/Gasoline Tank	375 gallon Used Oil Tote (Shop 1)	230-gallon Used Oil Tote (Shop 2)	230 gallon New Oil Tote (Shop 1)	230 gallon New Oil Tote (Shop 2)	55 Gallon Drum Oily Rags (Shop 1)	55 Gallon Drums - Oil & Filters (Shop 2)	Corrective Action
SECONDARY CONTAINMENT AREA								
Any Breach of Secondary Containment Structures? (cracks, gaps, damage to walls/ floor)						Y N	Y N	
Any noticeable staining within containment area?						Y N	Y N	
Any leaks, spills, odors? Where?						Y N	Y N	
Any water in containment? Is there a sheen? Are spill controls in place? Was water discharged?						Y N	Y N	
COMMENTS								

Inspector's Signature: _____ Date: _____

APPENDIX C

Emergency Release Forms

Fuel Transfer Procedures Checklist

GALVESTON WHARVES

EMERGENCY SPILL RESPONSE FORM

Type of Response:		
Incident Number:	**Date:**	**Shift:**
Units Used:	**Additional Units Responding:**	
Products Involved:	**U.N. Number:**	
Quantity:	**Released Into:**	
Released From:	**Weather: Clear**	
Wind Speed:	**Wind Direction:**	
Location:		

Caller Notification: EPA__ USCG____ TCEQ___ OTHER ___

SPILL CONTRACTOR RESPONSE

Company Involved:	**Agencies Notified:**
Contact:	**Title:**
Address:	**Phone:**
Shipper:	
Contact:	**Title:**
Address:	**Phone:**
Clean Up Company:	
Contact:	**Title:**
Address:	**Phone:**
Incident Command:	**Title:**
Firefighters on Scene:	
Equipment / Supplies Used:	

INJURIES/ MEDICAL RESPONSE

Patient Name:		**Employer:**	
DOB:	**Sex:**	**Supervisor:**	**Phone:**

Transported By:	**Transported To:**
Equipment / Supplies Used:	

GALVESTON WHARVES

EMERGENCY SPILL RESPONSE FORM

Incident Narrative

Incident Number –	**Date Of Incident –**

Report Prepared By:	Title:

FUEL TRANSFER PROCEDURES		
Stage		**Tasks**
Priot to Loading / Unloading	☐	Visually check all hoses for leaks and wet spots.
	☐	Verify that sufficient volume (ullage) is available in the storage tank or truck.
	☐	Lock in the closed position all drainage valves of the secondary containment structure
	☐	Secure the tank vehicle with wheel chocks and interlocks.
	☐	Ensure that the vehicle's parking brakes are set.
	☐	Verify proper alignment of valves and proper functioning of the pumping system.
	☐	If filling a tank truck, inspect the lowermost drain and all outlets.
	☐	Establish adequate bonding/grounding prior to connecting to the fuel transfer point.
	☐	Turn off cell phone.
During Loading / Unloading	☐	Driver must stay with the vehicle at all times during loading/unloading activities.
	☐	Periodically inspect all systems, hoses and connections.
	☐	When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.
	☐	When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump.
	☐	Maintain communication with the pumping and receiving stations.
	☐	Monitor the liquid level in the receiving tank to prevent overflow.
	☐	Monitor flow meters to determine rate of flow.
	☐	When topping off the tank, reduce flow rate to prevent overflow
After Loading / Unloading	☐	Make sure the transfer operation is completed.
	☐	Close all tank and loading valves before disconnecting.
	☐	Securely close all vehicle internal, external, and dome cover valves before disconnecting.
	☐	Secure all hatches
	☐	Disconnect grounding/bonding wires.
	☐	Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan.
	☐	Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
	☐	Remove wheel chocks and interlocks.
	☐	Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

APPENDIX D

Training Logs

Spill Prevention Control & Countermeasure Plan

TRAINING RECORD FORM

TYPE OF INSTRUCTION: ANNUAL OR NEW HIRE

DATE:

INSTRUCTOR:

EMPLOYEE NAME (Print)	DEPARTMENT	POSITION	EMPLOYEE SIGNATURE

APPENDIX E

Certification of the Applicability of the Substantial Harm Criteria Checklist

APPENDIX E

Certification of the Applicability of the Substantial Harm Criteria Checklist

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   Yes _____ No **X**

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes _____ No **X**

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife sensitive environments?

   Yes _____ No **X**

4. Does the facility have a storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

   Yes _____ No **X**

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the past 5 years?

   Yes _____ No **X**

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____

Signature

Laura Camcioglu

Name (please type or print)

Director Special Projects

Title

_____

Date