

BEST MANAGEMENT PRACTICES PLAN/SWPPP SUNOCO PARTNERS MARKETING & TERMINALS L.P. EAST BOSTON TERMIAL 467 Chelsea Street East Boston, MA 02128

NPDES Permit No. MA 0004006

Date: 01/29/22

Certification of SWPPP Review

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

	Date of Review	Reviewed By	Title	Signature	Reason for Review	Is terminal in compliance with SWPPP	Are previous year's inspections/maint in compliance with the permit?
	6/22/12	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review	Yes	Yes
	1/30/13	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review	Yes	Yes
	3/20/14	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review	Yes	Yes
	3/17/15	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review/update to contact list	Yes	Yes
	3/16/16	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review/update to contact list	Yes	Yes
	3/8/17	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review	Yes	Yes
	3/27/18	Marguerite Porrini	Env Specialist	Marguerite Porrini Original onsite	Annual review	Yes	Yes
	3/13/19	Marguerite Porrini	Env Specialist	m.Q.	Annual review/update to contact list	Yes	Yes
	10/13/20	Marguerite Porrini	Env Specialist	MangQo	Annual review	Yes	Yes
	1/29/22	Marguerite Porrini	Env Specialist	Ma~gQa Type tex	Update to product tank storage (128, 129, 130) corrected tank 71 product	Yes	Yes
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Plan Review Procedure

This plan will be reviewed annually by the Facility Manager and the environmental specialist for accuracy.

TABLE OF CONTENTS

					Page #
1.0	Intro	duction			4
2.0	Gene	eral Site De	escription		4
3.0	Signa	Signatory Requirements and Plan Amendments			5
4.0	Best Management Practices Committee			5	
5.0	Description of Potential Pollution Sources				
	5.1	Site Plan	n		6
	5.2	Inventor	ry of Significa	ant Materials	6
		5.2.1	Descripti	on and Best Management Practice of Significant Materials	7
		5.2.2	Significar	t Materials Loading, Unloading and Access Area	7
		5.2.3	Vehicle S	torage	8
		5.2.4	Structura	8 Non-Structural Control Measures to Reduce Pollutants	
			in Storm	water	8
			5.2.4.1	Structural Control Measures	9
			5.2.4.2	Non-Structural Control Measures	9
	5.3	Significa	nt Spills, or	Leaks of Hazardous Pollutants	11
	5.4	Storm w	ater Monito	ring Data	11
	5.5	Summar	y of Potenti	al Pollution Sources	11
		5.5.1	Facility Ta	ank Truck Loading Rack	11
		5.5.2	Facility Pi	peline Transfer Operations and Pumping	12
		5.5.3	Barge Un	loading/Loading Facilities	12
		5.5.4	Storage T	anks	12
	5.6	Pollutan	ts with a Re	asonable Potential to be Present in Storm water Discharges	13
6.0	Storr	n water M	lanagement	Controls	13
7.0	Preventive Maintenance				14
8.0	Spill	Preventior	n and Respo	nse Procedures	15
9.0	Emp	loyee Trair	ning		15
10.0	Inspe	ections			15
11.0	Disp	osal Proce	dures		16
12.0	Recordkeeping and Internal Reporting Procedures			16	
13.0	Non-	Storm wat	ter Discharg	es	16
14.0	Certi	fication			17
TABLE 1	L Pollu	ition Preve	ention Team		18
APPEN	DIX A-	Maps			19
	Gene	eral Equipr	ment Arrang	ement	
	USG	S Quadran	gle Map		
	East	Boston Sto	orm Water F	low	
	Reso	urce Infor	mation Map		

1.0 INTRODUCTION

This plan fulfill the requirements of developing a Stormwater Pollution Prevention Plan (SWPPP)/ Best Management Practices Plan (BMPP) for the East Boston Terminal (the facility), located at 467 Chelsea Street East Boston, MA 02128 in compliance with the provisions of the Federal Clean Water Act.

It is the environmental policy of Sunoco Logistics to comply with all applicable laws, regulations, permits and orders. The facility is primarily engaged in the storage and distribution of petroleum products. The purposes of the Best Management Practices Plan are to identify potential sources of storm water pollution and to develop and implement management practices to minimize pollution in storm water discharge. The Plan has been prepared in accordance with sound engineering practices.

The facility operates under individual NPDES permit number MA 0004006. The individual permit requires the facility to develop a BMP Plan detailing the administrative and operation procedures implemented at the facility to prevent surface water pollution. Storm water sampling is required by the individual permit for the facility. Sampling is done on a monthly basis. The remainder of this document will address the specific requirements of the BMPP as required by the individual storm water permit.

2.0 GENERAL SITE DESCRIPTION

The East Boston Terminal is a petroleum products distribution and bulk storage terminal located in East Boston, MA. The facility handles various petroleum products, including gasoline, diesel fuel, and jet fuel. These significant materials are described in detail in Section 5.2.1 of this Plan. The terminal is owned by Sunoco Logistics.

The terminal is located in East Boston, on the Chelsea River and covers approximately 37 acres. The facility consists of marine bulk unloading facilities, 20 aboveground petroleum storage tanks, a truck loading rack, a truck fleet maintenance garage and offices.

Products are received by barge or ship at the dock facilities. Product is distributed by a tank truck via the truck loading rack. The truck loading rack has eight loading bays. All bays are bottom-loading bays with vapor recovery lines to a vapor recovery unit. Jet fuel is also delivered to Logan Airport via a direct, dedicated pipeline.

The 20 aboveground storage tanks have total capacity of approximately 877,511 barrels. All tanks are equipped with HTG gauges that are connected to an automatic gauging system, and all have high level alarms, both local and remote dot the dock office. Foam fire protection systems protect the storage tanks and the truck loading rack.

The receiving water for any pollution would be the Chelsea River that borders the property. A General Location Map that shows the location of this facility and the receiving waters within one mile of the facility is included in Appendix A. Also in Appendix A is a site plan map identifying storm water flows and location of the major terminal components.

3.0 SIGNATORY REQUIREMENTS AND PLAN AMENDMENTS

All reports, Best Management Practices Plans, Certifications or other information required by the U.S. EPA and the Commonwealth of Massachusetts or required by the Plan, shall be reviewed, approved, signed and certified as applicable by the proper Sunoco Logistics authority.

A new signature authorization will be submitted to the applicable permit authority if the signature authorization(s) are no longer valid due to changes in personnel, responsibilities, or position.

The facility will amend the plan whenever there is a change in design, construction, operation or maintenance, which has a significant effect on the potential for discharge of pollutants to the waters of the State or if the plan proves to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges.

A written copy of this plan and associated documents will remain at the facility. The plan will be reviewed and updated by the Best Management Practices Committee (see Section 4.0). Upon request, the plan will be made available for review by the EPA and authorized state or regional storm water management representatives.

4.0 BEST MANAGEMENT PRACTICES COMMITTEE

The Best Management Practices Committee consists of a team of facility employees responsible for developing the plan and assisting in its maintenance and revision. The primary responsibilities of the Best Management Practices Committee include:

- Assign resources and manpower to the Best Management Practices Committee
- Conduct materials survey
- Identify potential spill sources
- Establish spill reporting procedures
- Prepare visual inspection programs and checklists
- Review past incidents of spills
- Coordinate departments in implementing goals of the plan
- Establish employee training programs
- Implement, review and update plan
- Conduct meetings regarding the plan

Review new construction and process changes relative to spill prevention and control

The Terminal Manager and/or his designee have responsibility for implementation of the provisions of this plan. The Terminal Manager is responsible for assigning individuals at the facility to the Best Management Practices Committee and monitoring their responsibilities under this plan.

Table `1 identifies the individuals assigned to the Best Management Practices Committee, their responsibilities and telephone numbers. All individuals listed in Table 1 are responsible for carrying out their assigned duties. In the event that both the primary and secondary members of the Best Management practices Committee are not available, alternate personnel listed in the Facility Integrated Contingency Plan would be contacted in case of emergency.

The Best Management Practices Committee will meet annually to review and evaluate the effectiveness of the Plan. In the event that a significant spill or leak to surface water occurs, the Committee will meet as soon as possible after the spill or leak has been controlled to review the incident. The Committee will evaluate the effectiveness of the overall program and make recommendations to management in support of the facility policy. The plan will be amended as necessary. Amendments will be performed in accordance with Section 3.0 of this plan.

5.0 DESCRIPTION OF POTENTIAL POLLUTANT SOURCES

This plan provides a description of potential sources which (1) may be expected to impact storm water, (2) result in the discharge of pollutants during dry weather and (3) result in nonstorm water discharges from the facility. Additionally, the plan identifies all activities and significant materials that may be potential pollutant sources. For the purposes of the Best Management Practices Plan, a significant material is defined as raw materials, fuels, solvents, detergents, plastic pellets, finished materials, raw materials used in food processing or production, hazardous substances under Section 101(14) of CERCLA, chemicals reported under Section 313 of Title III of SRAR, fertilizers, pesticides or waste products that have the <u>potential</u> to be released to surface water.

5.1 Site Plan

A site plan of the facility is shown as Figure 1. Included in the plan are: storm water conveyance and discharge structure locations, outline of the storm water drainage areas for each discharge point, paved areas and buildings, locations of existing storm water structural controls, surface water locations, areas of existing and potential soil erosion and vehicle service areas.

5.2 Inventory of Significant Materials

5.2.1 Description and Best Management Practice of Significant Materials

The following narrative describes the use of Significant Materials at the facility. Materials are managed to prevent the release of toxic pollutants to surface waters and minimize the potential for contact with storm water. The purpose of these Best Management Practices (BMPs) is to keep pollutants out of the storm water runoff by reducing exposure to storm water, directing the storm water away from contaminated areas, or reducing the volume of potentially polluting materials on the site. The following narrative describes the BMPs employed to prevent the release of toxic pollutants. Section 8.0 discusses spill prevention and response procedures for Significant Materials.

- Gasoline; Stored in tanks 71, 78, 90, 122, 124 and 125. These tanks are equipped with HTG gauges that are connected to an automatic gauging/ inventory system. All tanks have high level alarms. Each of the tanks is located in a diked area which is large enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.
- Ethanol; Stored in tank 126. This tank is equipped with HTG gauges that are connected to an automatic gauging/ inventory system. All tanks have high level alarms. Each of the tanks is located in a diked area which is large enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.
- Low Sulfur Diesel: Stored in tanks 73, 123, 116, 128, 129 and 130. These tanks are equipped with HTG gauges that are connected to an automatic gauging/ inventory system. All tanks have high level alarms. Each of the tanks is located in a diked area which is large enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.
- Jet Fuel: Stored in tanks 52, 62, 64, 67, 69, 87, 104, and 127. These tanks are equipped with HTG gauges that are connected to an automatic gauging/ inventory system. All tanks have high level alarms. Each of the tanks is located in a diked area which is large enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.
- Additives: Stored in 4 unnumbered tanks: These tanks are equipped with local high level alarms. Each of the tanks is located in diked area that is large enough to contain any spill that may occur in that diked area. The dike drainage systems are fully described in Section 5.2.4.1 of this plan.
- Process Water/Slop Oil: Stored in tanks 92,93, 94. These tanks are equipped with HTG gauges that are connected to an automatic gauging/ inventory system. The tank has a high level alarm. The tank is located in a diked area which is large

enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.

- Stormwater: Stored in tanks 50 and 57. These tanks are equipped with HTG gauges that are connected to an automatic gauging/ inventory system. All tanks have high level alarms. Each of the tanks is located in a diked area which is large enough to contain any spill which may occur in that diked area. The dike drainage system is fully described in Section 5.2.4.1 of this plan.
- Solid Waste: Office waste is stored in a dumpster located on the paved area of the facility. The dumpster has a lid. Other waste materials including oily wastes are stored in DOT specification drums that are stored in buildings or in dumpsters or roll-offs with tight fitting covers or lids. Therefore it is unlikely that storm water will come into contact with these wastes.
- Recyclables: Cardboard and co-mingled recyclables are stored in dumpsters located on the paved area of the facility. The dumpsters have lids; therefore it is unlikely that storm water will come in contact with the recyclables.

5.2.2 Significant Materials Loading, Unloading and Access Area

The location of all loading, unloading, storage, disposal and access areas associated with Significant Materials are shown on Figure 1.

Petroleum products are loaded in the loading rack area, making this an area where any pollutants that might contact the pavement as a result of miscellaneous drips or accidental overfill could potentially wash into the storm water system. In order to prevent this from occurring, the rack is covered by a canopy. In addition, any contaminants or storm water that falls under the rack flow to a separate drainage system and are collected in Tanks 92, 93, or 94. Tanks 92, 93 and 94 are emptied via truck and the oil/water mixture is shipped offsite as a commercial chemical product regulated under the facility's Class A Recycling Permit or is disposed of offsite as hazardous waste. Barges and ships unloading access the dock from the Chelsea River.

5.2.3 Vehicle Storage

All Sunoco Logistics owned vehicles are stored on paved areas. These paved areas on the river side of Chelsea Street drain to sumps which pump to Tank 50 for eventual treatment in the wastewater treatment system. At night, maintenance vehicles are parked in the parking area adjacent to the office building. This area drains to municipal storm drains in the street.

5.2.4 Structural and Non-Structural Control Measures to Reduce Pollutants in Storm water

The facility incorporates several structural and non-structural control measures for the purpose of reducing pollutant discharge to surface water. The following narrative

briefly describes each control measure used on-site. As previously stated, the purpose of BMPs is to prevent discharges to surface water.

5.2.4.1 Structural Control Measures

Figure 1 shows the location of each structural control measure in use at the facility. The following provides a brief narrative of structural control measures and their function.

Storm water at the facility is directed to a storage tank that leads to a wastewater treatment system, with final discharge to the Chelsea River. Surface drainage from the paved area, the truck loading rack area and tank dike areas, is collected in individual sumps that pump to Tank 50. When the level in Tank 50 reaches a certain level, it is pumped to the wastewater treatment system, which consists of 6 multimedia filters that are operated as 2 trains of 3 filters each in parallel, and 2 granular activated charcoal filters operated as a lead and guard filter.

Drainage from diked storage areas is controlled as follows: Each storage tank is within a diked area. Accumulated water in the tank dikes drains to a sump, which has a manually started pump. In accordance with the NPDES permit, water accumulation within diked areas is visually inspected for petroleum products and any accumulation of oil is removed with sorbent materials or vacuum trucks before the water is pumped to Tank 50 for eventual treatment in the wastewater treatment system.

The dock unloading area is equipped with a spill pan for catching spilled oil. The pan is covered to keep out storm water. Any product that accumulates in the pan is pumped back to product. Product is also stripped from the unloading arms and hoses and pumped back to product before the lines are disconnected from a ship or barge.

A truck brake interlock system is controlled at the truck manifold when the loader is connected to the valves. This system prevents departure of the vehicle being loaded before loading operations are complete. Drains and outlets on tank trucks are checked for leakage before loading/unloading or departure.

A Scully System is also employed at the rack. This system provides vehicle overfill protection while loading. Overfill protection is provided by probes on each truck, which, when connected to the system, shuts off flow to the truck automatically when product contacts the probe.

5.2.4.2 Non-Structural Controls

Non-structural storm water control measures implemented at the facility include the following:

• Housekeeping

Housekeeping measures are used at the facility to minimize potential pollution from on-site sources. Housekeeping measures include sweeping, spill response, neat and orderly storage of materials in approved containers, maintenance of floors (prompt repair of cracks), and maintaining adequate aisle space. See Section 6.0 for further details concerning housekeeping. Drips and spills from vehicles parked on the facility lot are cleaned up as needed with the use of Speedy-dry.

• Spill Response

Employees are trained annually to recognize potential spill situations and respond to them appropriately. Inspections of significant materials storage locations are made on a regular basis, and therefore prompt response to a release can be made.

Drips pans are provided to contain products when drained connections are opened in the dock area. A 23-foot boat with a 155-hp engine and 1000 ft of boom are available to contain a minor spill at this facility.

• Security

The facility is enclosed by an eight foot high chain link fence. Any valves that permit outward flow of a tank's contents are locked when in non-operable or standby status. Starter controls on all oil pumps are located at a site accessible only to authorized personnel. Pumping units are not locked in the off position, except when repairs are in progress, as they are in use on a 24 hour basis.

The loading rack is equipped with a card activated loading system. The driver must have an approved customer card to initiate loading. Drivers are instructed in loading procedures and must demonstrate proficiency in loading properly before their card is activated. Barge unloading is controlled by a dock man and an operator. The dock system is equipped with gravity check valves that close immediately in the event of a spill.

Lighting at this facility is adequate in all designated work areas.

• Visual Inspections

Routine visual inspections are conducted at significant material storage locations. Visual inspections are carried out following written procedures. Visual inspections include: identifying any spills or leaks from aboveground storage tanks and determining if the storage areas are policed properly. Inspections assist in identifying spills and leaks, corroded pipes and tanks, equipment deterioration and stains and windblown significant materials. Further description of inspection procedures is provided in Section 10.0.

5.3. Significant Spills or Leaks of Hazardous Pollutants

Sunoco Logistics purchased the East Boston Terminal from the ConocoPhillips Corporation on September 1, 2011. There have been no spill events of Significant Materials since the purchase of the property.

5.4 Storm water Monitoring Data

The facility has an individual NPDES for the discharge of storm water (NPDES permit no. MA 004006). In accordance with this permit, storm water will be sampled according to Part I A-monitoring requirements. Data is kept on file at the facility by the terminal supervisor or can be accessed electronically through CDX NetDMR platform. Recordkeeping is available for review upon request.

5.5 Summary of Potential Pollution Sources

No manufacturing occurs at this facility. Processing activities include tank truck loading/unloading pipeline transfers and barge unloading. Materials stored outside include virgin petroleum products, waste oils, solid waste and recyclables.

5.5.1 Facility Tank Truck Loading Rack

Tank truck loading occurs at this facility. The loading procedures meet the minimum requirements and regulations of the Department of Transportation. The loading rack has a quick drain system that leads to a sewer system and sump that pumps to Tank 93. The system is separate from the rest of the storm water management system and has the capacity to contain a single compartment of a tank truck being loaded.

Written procedures and training instruct drivers to prevent premature vehicle departure before disconnection of transfer lines. Each driver is instructed to remove or disconnect loading connections and unfasten grounding devices before departure.

A truck brake interlock system is controlled at the truck manifold when the loader is connected to the valves. This system prevents departure of the vehicle being loaded before loading operations are complete. Drains and outlets on tank trucks are checked for leakage before loading/ unloading or departure.

A Scully System is also employed at rack. The system provides vehicle over fill protection while loading. Overfill protection is provided by probes on each truck, which, when connected to the system, shuts off flow to the truck automatically when product contacts the probe.

An emergency shutdown switch is located at each load rack bay and the terminal office. When activated, they cut all power to the load racks and product pumps.

An automatic foam fire protection system protects the loading rack from fire.

5.5.2 Facility Pipeline Transfer operations and Pumping

At this facility, pipelines are wrapped and coated, where warranted, to reduce corrosion. Cathodic protection is provided for pipelines. When a pipeline is exposed, it is examined and corrective action taken as required.

Pipeline terminal connections are capped or blank-flanged if the pipeline is not in service or on stand-by status for an extended period. When a leak is detected in a pipeline, or if a line is taken out of service, the line is capped, blank-flanged or panned. Lines taken out of service are drained of their product.

Pipe supports are used to minimize abrasion and corrosion and allow for expansion and contractions.

5.5.3 Barge Unloading/Loading Facilities

The dock unloading area is equipped with a spill pan for catching spilled oil. The pan is covered to keep out storm water. Any product that accumulates in the pan is pumped back to product. Product is also stripped from the unloading arms and hoses and pumped back to product. Product is also stripped from the unloading arms and hoses and pumped back to product before the lines are disconnected from a ship or barge.

Drip pans are provided to contain products when drained connections are opened in the dock area. A 23 foot boat with a 155 hp engine and 1000 ft of boom are available to contain a minor spill at this facility.

5.5.4 Storage Tanks

Aboveground Tanks

The storage tanks at this facility are of standard API specifications. Tanks are painted to prevent corrosion. A remote gauging system allows terminal operators to continuously monitor receipts and product transfers. High level tank alarms warn of impending overfill conditions. Cathodic protection has been installed around all tanks.

Secondary containment consists of earthen and/or concrete dikes which surround all storage tanks. The volume of the diked areas is sufficient to contain 110% of product in the largest tank. The secondary containment surrounding the tanks is sufficiently impervious to contain spilled product.

Any valves which permit outward flow of tank's contents are locked closed when in nonoperating or stand-by status.

Underground Tanks

There are no underground storage tanks at this facility.

5.6 Pollutants with a Reasonable Potential to be Present in Storm water Discharges

The following activities are conducted at this facility:

- Tank truck loading/unloading
- Pipeline transfers
- Barge or ship unloading

Based upon the activities and control methods identified, petroleum products would reasonably have the potential to be present in storm water runoff. De minimus drips and leaks of vehicles and equipment can be expected. The facility's stormwater that may be impacted by the above described activities is treated through wastewater treatment prior to off-site discharge. Pollutants with a reasonable potential to be present in stormwater discharges are monitored through analysis of as Oil and Grease and Total Suspended Solids.

6.0 STORMWATER MANAGEMENT CONTROLS

This plan identifies control measures at the facility for managing storm water, thus minimizing the potential to containment waters of the United States. These controls are reviewed to determine their appropriateness and levels of priority.

The facility follows good housekeeping practices to reduce the possibility of accidental spills and to minimize safety hazards to facility personnel. Specific areas include:

Truck loading Rack- the drainage system for the loading rack has been previously described. All storm water from the rack flows to a sump that pumps to Tank 93 from which it is shipped offsite for treatment. A roof covers the rack. The roof drains empty into the Tank 127 containment area. Storm water from the paved area flows to a sump that pumps to Tank 50 for treatment in the wastewater treatment system.

Dock Area - The containment area around the manifold flows to a sump that pumps to Tank 50 for treatment in the wastewater treatment system. The road along the dock, used only when there is not a vessel at the dock, flows directly to Chelsea River.

Vehicle and Equipment Storage Areas - All Sunoco Logistics owned vehicles are parked in the paved areas of the terminal. Vehicle parking areas are inspected and maintained regularly. This maintenance program minimizes the potential for petroleum drips, spills and leaks to be discharged with storm water. Storm water from the paved area on the river side of Chelsea Street flows to a sump that pumps to Tank 50 for treatment in the wastewater treatment system. Storm water from the paved area adjacent to the office building flows to municipal storm drains in the street. Absorbent materials are properly disposed of.

Material Storage Areas - All petroleum products are stored in above ground storage tanks which prevent direct contact with storm water. Other significant materials which may be used are stored in drums with tight fitting lids, which prevent contact with storm water. Solid wastes are stored in either drums with tight fitting lids, or in roll-offs or dumpsters with covers which prevent direct contact with storm water. These materials are either stored indoors, or on the paved area of the terminal Storm water from the paved area flows to a sump that pumps to Tank 50 for treatment.

Prompt removal of de minimums spillage - De minimus spills occur in the parking lot, materials handling and fuel transfer areas. De minimus spills are the result of overfilling or drips from containers. Absorbent material is placed on the spill and waste absorbent material is properly disposed of in accordance with applicable federal, state and local regulations.

Vehicle and Equipment Cleaning Areas -- The only equipment cleaning done onsite is the periodic washing of the loading rack area. No detergents are used. All wash water flows to the drains at the loading rack or the paved area. As previously described, water from these areas flows to a sump that pumps to Tank 50 for treatment before discharge.

7.0 PREVENTIVE MAINTENANCE

Preventive maintenance is performed on specific pieces of equipment on a regular schedule. Pumps have their oil changed and are greased on a regular basis. The loading rack systems receive specific preventative maintenance on a monthly basis.

The preventative maintenance program includes inspection of facility equipment and systems and stormwater management devices to detect conditions which may cause breakdowns or failures resulting in the discharge of Significant Materials into storm water.

Inspections

Each system and piece of equipment is inspected on a routine basis. Inspection procedures and frequency vary depending on the equipment/system. The required inspections carried out at this facility follow written procedures. The written procedures and record of inspections are kept at ht terminal office. Terminal personnel are also in the tank farm daily, and have an opportunity to observe conditions.

Specific items noted in the inspections include:

- Pipe and pump leaks
- Wastewater treatment system

- Paved area surface
- Containment areas
- Tank corrosion
- Deterioration of supports or foundations
- Staining in draining areas and on tanks

More detailed information on inspections is provided in Section 10.0

8.0 SPILL PREVENTION AND RESPONSE PROCEDURES

Spill Response Procedures for each of the Significant Materials are described in detail in the facility's Integrated Contingency Plan. Copies are located in the Terminal Manager's office and in the dock office.

9.0 EMPLOYEE TRAINNING

Employee training programs are developed to inform facility personnel of the components and goals of the plan, and other spill prevention plans, including the Facility Integrated Contingency plan. The training covers practices for preventing spills and the procedures for responding properly and rapidly to spills. Personnel are trained initially prior to work assignments and annually thereafter.

Employee training meetings are held annually and are combined with SPCC training. The meetings emphasize spill events or failures, malfunctioning equipment, new policies or programs regarding spill prevention or response and employee's responsibilities and roles.

10.0 INSPECTIONS

The loading rack is inspected weekly. These inspections are recorded.

Each system and piece of equipment is inspected on a regular basis. The loading rack is inspected. Storage tanks and ancillary equipment are inspected to API-653 requirements. A log book of those inspections is kept at the facility. The major elements of the storage tank inspections include:

- Condition of tank shell
- Corrosion
- condition of tank foundation
- leaks
- condition of tank dike

• pipe support systems

On a more frequent basis, the terminal operator makes a tour of the terminal during each shift.

11.0 DISPOSAL PROCEDURES

All solid and hazardous wastes are managed at off-site permitted facilities, in compliance with all applicable local, state and federal regulations. In addition to commercial treatment, storage, disposal or recycling facilities, wastewaters containing oil may be shipped to one of several locations. A list of these providers is kept in the Terminal File Room and maintained by the HES Department.

Other solid wastes are containerized in either DOT specification drums, or in roll-offs with tight fitting tarps. Liquids may also be stored in the tank where generated, before being loaded directly onto a tank truck for management.

12.0 RECORDKEEPING AND INTERNAL REPORTING PROCEDURES

All spills and other incidents which could cause the discharge of significant material to storm water are logged on an Incident Report Form, along with actions taken to mitigate the incident, and kept on file a the facility.

13.0 NON-STORMWATER DISCHARGES

The discharge has been evaluated for the presence of non-storm water discharges by on-site observations, a review of the piping schematics of the storm water drainage systems identified in this plan, and by visual observation of the outfall. In addition to storm water, the non-storm water discharges may include: flows from fire fighting activities, hydrostatic test water, vehicle and loading rack washings that do not contain detergents, and pavement wash water where spills or leaks have not occurred, unless the spill or leak has been clean up.

14.0 CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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rowog Glen Gronroos **Terminal Manager**

TABLE 1 POLLUTION PREVENTION TEAM

NAME	JOB TITLE	PHONE (WORK)
	Terminal Manager	(617) 568-2249
Glen Gronroos		
	Assistant Terminal Manager	(617) 568-2239
Anthony Leonforte		
	Environmental Specialist	(610)368-0307
Marguerite Porrini		

Duties:

Conduct materials inventory

Identify potential spill sources

Prepare visual inspection programs and checklists

Review past incidents of spills

Coordinate implementing goals of the plan

Establish employee training program

Implement, review and update the plan,

Conduct meetings regarding the plan,

Review new construction and process changes relative to spill prevention and control.

APPENDIX A

MAPS and CHARTS







