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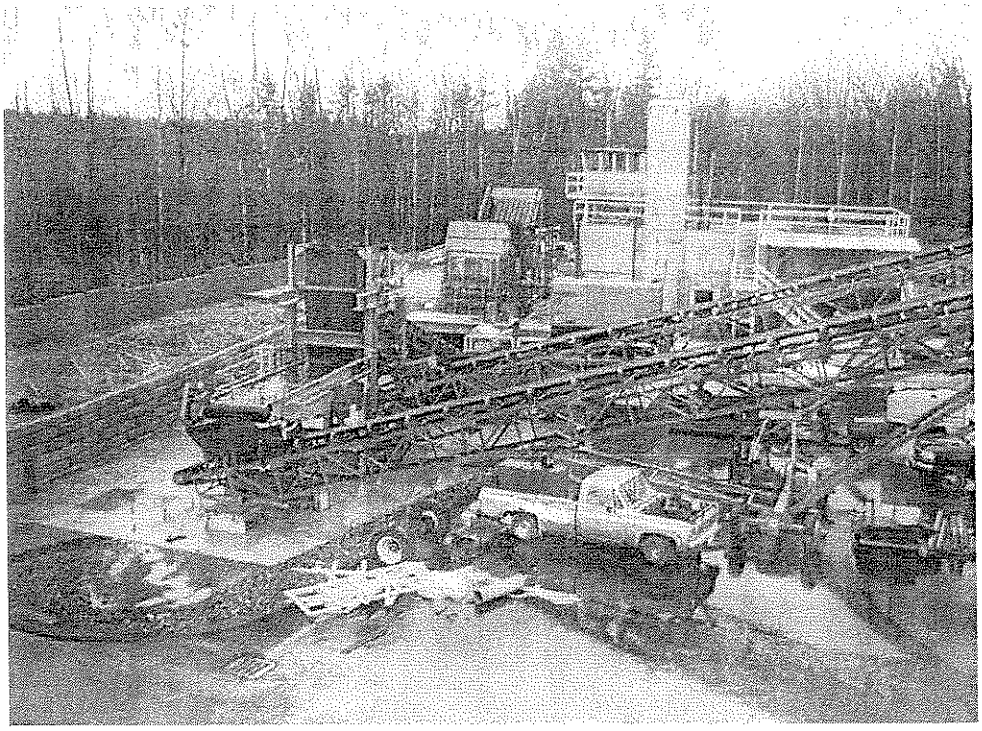

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE (SPCC) Plan

BERWICK IRON & METAL RECYCLING

METAL RECYCLING FACILITY
106 ROUTE 236
BERWICK, MAINE

Revision 0
(Initially Prepared in 2011 JAN)

Prepared by

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PROJECT NO. 05-479.01

JANUARY 2011

SPCC Plan - Berwick Iron & Metal Recycling
Berwick, NH

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MANAGEMENT APPROVAL & REVIEW – [112.5 & 112.7(d)(2)]

MANAGEMENT APPROVAL

Berwick Iron & Metal Recycling is committed to the prevention of discharges of oil to navigable waters or the environment, and maintains the highest standards for spill prevention control and countermeasures through periodic review, updating, and implementation of this Spill Prevention Control and Countermeasure (SPCC) Plan. Berwick Iron & Metal Recycling will provide the manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Authorized Facility Representative: ***Robert Brenna*** Signature: _____

Title ***President*** Date: _____

MANAGEMENT REVIEW

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

This SPCC Plan will also be amended within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer.

Review Dates	Signature	Amendment Required? Y/N

PROFESSIONAL ENGINEER'S REVIEW – [112.3(d)(1)]

The undersigned Registered Professional Engineer is familiar with the requirements of Chapter 40 of the Code of Federal Regulations Part 112 (40 CFR 112) and has supervised examination of the facility. The undersigned Registered Professional Engineer attests that this Oil Spill Prevention Control and Countermeasure Plan has been prepared in accordance with good engineering practices including applicable industry standards, and in accordance with the requirements of Chapter 40 of the Code of Federal Regulations Part 112 (40 CFR 112); that procedures have been established for required inspections and testing; and that the Plan is adequate for the facility.

	Signature
Jay E. Stephens	Name
Vice President	Title
CIVIL CONSULTANTS	Company
31 January 2011	Date
ME 5304	P.E Registration Number

Revision(s)

	Signature/Name
	Title/Company
	Date
	Signature/Name
	Title/Company
	Date

1.0 INTRODUCTION

1.1 Purpose

The purpose of this Oil Spill Prevention Control and Countermeasure (SPCC) plan is to prevent oil spills from occurring, and to perform safe, efficient and timely response in the event of a spill or leak (both referred to as "spills" herein). In accordance with United States Environmental Protection Agency (EPA) oil pollution prevention regulations (40 CFR 112 included as Attachment K), Berwick Iron & Metal Recycling must prepare and implement an SPCC plan for facilities that could reasonably be expected to discharge oil into or upon navigable waters or adjoining shorelines; and, meet one of the following conditions:

- Above-ground oil storage capacity exceeds 1,320 gallons; or
- Underground oil storage capacity exceeds 42,000 gallons, unless the underground tanks are subject to all of the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281. (Maine's approved program is Department of Environmental Protection, Chapter 691 – Rules for Underground Storage Facilities.)

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

1.1.1 Using the Plan

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

- As a reference for oil storage and containment system information.
- As a tool for informing new employees and refreshing existing employees on practices for preventing and responding to spills.
- As a guide to periodic training programs for employees.
- As a guide to facility inspections.
- As a resource during an emergency response.

1.1.2 SPCC Plan Revisions

Berwick Iron & Metal Recycling must revise this SPCC plan for any change in the facility design, construction, operation or maintenance that affects the facility's potential for discharging oil. Revisions must occur as soon as possible, but no later than six months after the change occurs. The Environmental Compliance Officer is responsible for initiating and coordinating such revisions.

Additionally, this SPCC plan must be reviewed at least once every five years. Revisions to the plan, if any, must be made within six months of the review. Facility information related to the SPCC plan must be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator whenever the facility discharges more than 1,000 gallons in a single event, or discharges more than 42 gallons of oil in each of two spill events within a 12-month period.

1.2 Facility Description [112.7(a)(3)]

1.2.1 Location & Use

Berwick Iron & Metal Recycling operates a metal recycling Facility (w/aboveground fuel tanks - AST's) at a site off Route 236 in Berwick, Maine. The site fronts on Route 236 and is a "grandfathered" use in the Rural Commercial/Industrial zoning district. Other abutting land has been developed both commercially and residentially. A site location map (Figure 1) is shown below.

Portion of USGS Location Map
Somersworth NH Quadrangle
7.5 Minute Series (TOPOGRAPHIC) (*not to scale*)
Latitude 43.26/Longitude -70.84+/-

FIGURE 1

The facility sits on approximately 15.64 acres of land and includes a garage, an engine room, a metal shredder, several storage buildings w/equipment and supplies to support the daily operations involved in the processing of iron and metal scrap. In addition to the buildings and equipment noted above, there are storage trailers (spare parts) on the site, paved & unpaved equipment storage/parking areas and several AST's as noted below. A general site plan is included in appendix C.

The Following are the aboveground tank facilities on the site:

Inside Tanks:

Tank #1 - 660 gal. Off-Road diesel Fuel

Tank #3 - 250 Gallon - Portable (on wheels) gasoline tank (Gasbuddy)

Tank #4 - 250 Gallon - Spare, not in use, Portable (on wheels) gasoline tank (Gasbuddy)

Tank #5- 200 gal Motor Oil Crankcase

Tank #6 - 275 Gallon - #2 Fuel Oil

Tank #7 - 55 gal drum storage area (used motor oil, gasoline, and diesel fuel)

Outside Tanks

Tank #2 - 500 Gallon off-Road Diesel Fuel Skid Tank

Tank #8 - 920 Gallon diesel tank built into standby generator

1.2.2 Waterways and Abutters

The nearest body of water to the site is Worster Brook located approximately 200 feet to the east (see Figure 1). Stormwater at the site runs to the east, and ultimately discharges to Worster Brook and then to the Salmon Falls River (approximately 1,500 feet away). Personnel at the facility must be made aware that spills leaving the site can impact the brook, river, and abutting woodland areas.

1.2.3 Site Drainage

Stormwater surface runoff at the site discharges to the east as described above. A majority of the immediate drainage area is paved and/or gravel. All of the storage tanks are located within concrete containment structures or are double walled. There are subsurface drainage structures and/or lines on the site. Surface water flows over nearly flat ground that eventually leaves the site by entering drainage swales and structures at the south and southeast corners of the property. Then continues easterly into sediment ponds before exiting through oil/water separators, thence 170 feet towards the Brook. There are 3 oil/water separators located in the paved area around the shredder facility.

2.0 POTENTIAL SPILL SOURCES AND SPCC FEATURES

2.1 SPCC Compliance [112.7(a)(1) & 112.7(a)(2) & 112.8]

Product is stored in multiple steel, aboveground tanks at the site. The largest tank (660 gallons with secondary containment), a diesel engine with 200 gallon crankcase, and a 275 gallon #2 fuel oil tanks are located within the concrete and steel shredder engine building. All fuel piping runs exposed within the building area and the supply piping contains an anti-siphoning valve (as appropriate) which prevents fuel from leaving the tank in the event of a broken or leaking pipe. There are whistle type overfill alarms and level gauges installed on the diesel fuel and fuel oil tanks.

Two smaller tanks as well as waste oil drums are located at other areas of the site:

12 - 55 gallon drums in a containment area (steel construction) are located in the garage in the dismantling area.

There are 2 portable 250 gallon gasoline tanks (Gasbuddys) on wheels located in an open sided "carport" style building.

There is a portable double walled 500 gallon diesel fuel skid tank located just beyond the scales in front of the open sided building.

A diesel generator located adjacent to the shredder engine building has its own self contained 920 gallon double walled fuel tank.

Spills or drips occurring during deliveries would be controlled and cleaned with on-board spill response materials by delivery personnel. Spill prevention materials are also available on site (located in the spill materials storage areas as noted on plan in Appendix C).

A containment failure at this facility would not result in substantial harm based upon the Substantial Harm Criteria Checklist of 40 CFR112.20 (e) (see Attachment D).

2.2 Tables [112.7(a)(3)(i & iii) & 112.7(b) & 112.7(c)]

ABOVEGROUND STORAGE TANKS

TANK NO.	CAPACITY (gallons)	PRODUCT	HI-LEVEL ALARM	ESTIMATED SPILL DIRECTION AND RATE	CONTAINMENT & SPILL CONTROL FEATURES
1	*660*	*Diesel (off-road)*	*Vent whistle*	*Spill would flow overland to the west. Worst case, 660 gallons at complete failure.*	*Double walled steel tank in concrete/steel containment. Anti-siphoning valve on supply piping, audible overfill alarm. Fill spill containment bucket. All fuel lines w/in containment.*
2	*500*	*Diesel (off-road)*	*Vent whistle*	*Spill would flow overland to the southeast. Worst case, 500 gal at complete failure.*	*Steel tank in concrete containment.*
3	*249*	*Gasoline*	*Gauge*	*Spill would flow overland to the southeast. Worst case, 249 gal at complete failure.*	*Steel tank on a concrete slab.*
4	*249*	*Gasoline Spare*	*Gauge*	*Spill would flow overland to the southeast. Worst case, 249 gal at complete failure.*	*Steel tank on a concrete slab.*

2.2 Tables [112.7(a)(3)(i & iii) & 112.7(b) & 112.7(c)] (continued)

5	200	Motor oil	No	Spill would flow overland to the west. Worst case. 200 gallons at complete failure	Diesel engine crankcase within engine building with concrete/steel containment.
6	275	#2 fuel oil	Vent whistle	Spill would flow overland to the west. Worst case. 275 gallons at complete failure.	Single walled steel tank in concrete/steel containment. Audible overfill alarm. All fuel lines w/in containment.
7	12 @ 55	55 Gal Drums Various waste oils, fuels, Lubricants	NA	Spill would flow overland to the east. Worst case, 55 gal at complete failure of one drum.	Maximum of 20 drums at any time. Steel drums in steel containment.
8	920	Diesel	No Alarm Level Gauge	Spill would flow overland to the west. Worst case, 200 gallons at complete failure	Double walled steel tank.

ABOVEGROUND PIPING

TANK NO.	PRODUCT	ESTIMATED SPILL DIRECTION AND RATE	CONTAINMENT & SPILL CONTROL FEATURES
1	Diesel (off-road)	Spill would flow overland to the east. Worst case. 660 gal at complete failure.	Piping located within concrete/steel containment for AST. All piping visible. Spill prevention materials stored in same building in area so marked.
2	Diesel (off-road)	Spill would flow overland to the southeast. Worst case. 500 gal at complete failure.	Double walled tank, fill spill container, all piping visible. Spill prevention materials stored in open sided building in area so marked
6	#2 fuel oil	Spill would flow overland to the east. Worst case. 275 gal at complete failure.	Piping located within concrete/steel containment for AST. All piping visible. Spill prevention materials stored in same building in area so marked.

MOTOR FUEL DISPENSERS

DISP. Tank #	# OF HOSES	PRODUCT	NEAREST DRAIN	ESTIMATED SPILL DIRECTION AND RATE	CONTAINMENT & SPILL CONTROL FEATURES
2	1	Diesel Fuel	N/A	South possibly 500 gallons.	Double walled Tank w/fill spill in containment.
3	1	Gasoline	N/A	South possibly 249 gallons.	

DRUM STORAGE

BLDG. or LOCATION	# OF DRUMS	PRODUCT & gal./drum	NEAREST DRAIN	ESTIMATED SPILL DIRECTION AND RATE	CONTAINMENT & SPILL CONTROL FEATURES
Inside Existing Garage	12	Waste oil Waste fuels Motor & Hydraulic Oils	None	After leaving building, Spill would flow overland to the south and east. Worst case, 55 gal at complete failure.	All drums within secondary containment structures inside the existing garage. All containment area is visible. (Containment is secondary steel tanks).

Containment calculations for tanks 1, 5 and 6 found in Appendix I.

3.0 SPILL PREVENTION AND RESPONSE

3.1 Discharge Prevention

3.1.1 SPCC Features and Operating Procedures [112.7(a)(3) & 112.8]

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

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

- keep container lids securely fastened at all times;
- do not leave portable sources unattended (outside);
- return portable sources to their storage location after use;
- use pads, drip pans, and funnels when transferring petroleum products from a portable container;
- protect oil sources from damage by moving equipment;
- contaminated water within the contained areas and piping & dispenser sumps shall be removed and disposed of by a licensed hazardous waste contractor;
- do not store oil sources near catch basins or floor drains; and
- loading and unloading of petroleum products shall be attended at all times.

Spill prevention during oil deliveries (offloading) is the primary responsibility of the supplier until the product is safely in the tank or vessel. Vehicle filling is the responsibility of (customers)(facility personnel). Berwick Iron & Metal Recycling implements spill prevention measures for loading, vehicle filling and truck unloading operations.

Supplier Approval

All suppliers must meet the minimum requirements and regulations for tank truck unloading as established by the United States Department of Transportation. Berwick Iron & Metal Recycling will also ensure that all suppliers understand the site layout, know the protocols for entering the site and unloading product, and have the necessary spill equipment on board to respond to a spill from the vehicle or fuel delivery hose.

Observation of Deliveries

The Facility Manager or designee will supervise deliveries for all new suppliers and will periodically observe deliveries for existing, approved suppliers. Delivery observations include:

- vehicle inspection prior to delivery and departure (*e.g.*, to make sure the driver does not drive away with the hose in the fill pipe);
- inquiry to ensure the truck contains the right product for the tank;

- assurance that the tank can hold what the supplier intends to deliver; and
- adequate spill response equipment is on board the vehicle.

Vehicle Filling (Dispensing)

Vehicle filling operations will be performed by customers (i.e. trained facility personnel).

- Facility personnel will monitor the fueling area for safe and proper operation, and will take immediate action to correct any deficiencies.

Draining Stormwater from Containment Areas and Sumps

Containment areas, impoundments, piping/dispenser sumps are to be drained only under the direct supervision of facility personnel. A record of draining activities will be kept on file (See Appendix H).

- Containment valves are normally kept in a closed position except when draining the containment.
- Accumulated stormwater is inspected for sheen, and only water without a visible sheen is released.
- Contaminated stormwater is removed for transport off site by a licensed hazardous waste or waste oil contractor.

3.1.2 Tests and Inspections [112.7(e) & 112.8(c)(6)]]

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

3.1.2.1 Inspecting ASTs, Piping and Dispensing Systems

Facility personnel periodically observe the ASTs during operating hours. The ASTs and associated piping and dispensing systems shall be inspected monthly, and the results shall be recorded on the *Monthly AST Inspection Report*, as included in Appendix E. Spill response kits kept on site shall also be checked during the monthly AST inspection, and restocked as necessary. The monthly inspection reports shall be kept for at least three years in a file maintained by the Facility Manager. Inspections of the tanks include observations of the exterior of the tank for signs of deterioration or spills (leaks), observations of the tank foundation and supports for signs of instability, and observations of the vent, fill and discharge pipes for signs of poor connection, that could cause a spill.

3.1.2.2 Tank and Equipment Maintenance

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

3.1.3 Training [112.7(f)]

Berwick Iron & Metal Recycling shall provide SPCC spill training for personnel involved with handling petroleum products. The Environmental Compliance Officer shall arrange for annual training, which shall include the following training topics:

- an introduction to pollution control laws;
- rules and regulations pertaining to the use and storage of petroleum products;
- inspection, operation and maintenance of spill equipment, and petroleum storage and dispensing equipment;
- spill response and cleanup;
- spill notification and record keeping; and
- spill prevention practices;
- familiarity with types of materials stored/used on site (Material Safety Data Sheet in Appendix J).

Records of attendance at training and topics covered shall be maintained by the Facility Manager.

3.1.3.1 Documentation for Training

All SPCC training (new hire and annual) shall be documented to include the instructor's name, course outline, date and duration of training, attendant's names and signatures, and corrective action list for areas in need of improvement, if any (See Appendix G). This information shall be filed and maintained for at least 3 years at the office of the Environmental Compliance Officer. A Certificate of Training shall be presented to each Berwick Iron & Metal Recycling employee that has completed the training (See Appendix G). The Environmental Compliance Officer shall forward a copy of this certificate to the Human Resource Department for inclusion in the employee's file.

3.1.4 Security [112.7(g)]

Berwick Iron & Metal Recycling Facility Business Hours are between 7:00 AM and 500 PM, Monday through Friday.

The facility is gated and the gates are closed and locked when the facility is closed.

The engine room where tanks are located will be locked during non-working hours.

The nozzles for the fuel dispenser units are locked during non-working hours. Power to the pump is provided by operator at time of use.

3.1.5 Conformance with State of Maine and Local Requirements [112.7(j)]

The site (as described in this SPCC Plan/Document) conforms to the applicable State of Maine Rules/Regulations - specifically:

Maine Office of the State Fire Marshal – Chapter 34 – Rules and Regulations for Flammable and Combustible Liquids

The site is zoned for this type of use. The Town of Berwick has no requirements for above ground storage tanks. From discussions with the Fire Chief and Code Enforcement Officer, approval from the Stat Fire Marshal is all that is required.

3.2 Emergency Response [112.7(a)(3)(iv), 112.7(a)(4) and 112.7(c)]

This section describes the cleanup response and protocols to follow in the event of an oil spill. The uncontrolled discharge of oil to groundwater, surface water or soil is prohibited by State or Federal laws. It is imperative that action be taken to respond to a spill once it has occurred. Depending on the volume and characteristics of the material released, Berwick Iron & Metal Recycling has defined spill response as either a "Minor Spill Response" or "Major Spill Response" ("Spill Emergency"). A list of Emergency Contacts is included in Appendix A. A list of spill response materials kept at the facility is included in Appendix F.

3.2.1 Minor Spill Response [112.7(a)(3)(iv)]

A "Minor Spill Response" is defined as one that poses no significant harm to human health or the environment. These spills involve generally less than 5 gallons and can usually be cleaned up by Berwick Iron & Metal Recycling personnel. Other characteristics of a minor spill include the following:

- the spilled material is easily stopped or controlled at the time of the spill;
- the spill is localized;
- the spilled material is not likely to reach surface water or groundwater;
- there is little danger to human health; and
- there is little danger of fire or explosion.

In the event of a minor spill the following guidelines shall apply:

- Stop the source if the spill is ongoing.
- Immediately notify the senior on-site person (i.e., Facility Manager).
- Call the Maine Department of Environmental Protection (1-800-482-0777) immediately.
- Under the direction of a senior on-site person, contain the spill with spill response materials and equipment.
- Place spill debris in properly labeled waste containers.

- Complete the *Spill Notification Form* (Appendix B) and send to the Environmental Compliance Officer.

3.2.2 Major Spill Response (Spill Emergency) [112.7(a)(3)(iv)]

A "Spill Emergency" is defined as one involving a spill that cannot be safely controlled or cleaned up. Characteristics include the following:

- the spill is large enough to spread beyond the immediate spill area;
- the spilled material enters surface water or groundwater (regardless of spill size);
- the spill requires special training and equipment to cleanup;
- the spilled material is dangerous to human health; and/or
- there is a danger of fire or explosion.

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

- Stop the source if the spill is ongoing only if safe to do so.
- All workers shall immediately evacuate the spill site and move to a safe distance away from the spill.
- A senior on-site person shall call for medical assistance if workers are injured (no worker shall engage in rescue operations unless they have been properly trained and equipped).
- A senior on-site person shall immediately contact the Maine Department of Environmental Protection (1-800-482-0777) and the National Response Center (1-800-424-8802). Document the telephone calls on the *Spill Notification Form* in Appendix B.
- Notify the local Fire Department or Police Department 911).
- A senior on-site person shall contact the Facility Manager and provide details regarding the spill.
- The Facility Manager or Environmental Compliance Officer will coordinate cleanup and seek assistance from a cleanup contractor as necessary.

If a senior on-site person is not available at the time of the spill, then the next highest Berwick Iron & Metal Recycling employee in command shall assume responsibility.

3.2.3 Waste Disposal [112.7(a)(3)(v)]

Non-hazardous wastes resulting from a minor spill response will be containerized in impervious bags, drums or buckets. Unsaturated oil spill clean up debris will be disposed of as special waste by a licensed waste hauler within two weeks. Any saturated oil spill clean up debris or recovered free product will be stored in drums and either re-used as fuel or disposed of properly.

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

3.2.4 Notification and Reporting [112.4 and 112.7(a)(4)]

3.2.4.1 Spill Notification Forms [112.7(a)(4)]

After making the appropriate phone calls and the spill is contained, a *Spill Notification Form* (included in Appendix B), shall be completed and submitted to the Environmental Compliance Officer. The *Spill Notification Form* includes a checklist to document the proper notification of state and federal agencies. The form shall be filed by facility name and maintained as long as Berwick Iron & Metal Recycling owns and/or operates this facility.

3.2.4.2 Submittal of Additional Information to the EPA and Maine DES [112.4]

If a single spill greater than 1,000 gallons occurs, or two spills each greater than 42 gallons occur within any 12 month period, at this Berwick Iron & Metal Recycling facility, the Environmental Compliance Officer shall, in addition to the notification procedures above, provide written information to the EPA Regional Administrator as required by the federal SPCC rules. A copy of this information must be provided to the Maine Department of Environmental Protection.

3.2.5 Area Plans

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

4.0 REQUIRED FACILITY IMPROVEMENTS

The Professional Engineer's certification of this plan is contingent on the following facility improvements being implemented for compliance with SPCC regulations 40 CFR 112:

1. Install 600 gallon double wall tank in Engine Room - as shown on site plan.
2. Complete the construction of steel containment in Engine Room - as shown on site plan.
3. Install 500 gallon off road diesel fuel tank.