

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Dutra Materials Haystack Plant

3355 Petaluma Blvd. South Petaluma, CA

July 16, 2014

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K: Agency Notification Standard Report

LIST OF ACRONYMS AND ABBREVIATIONS

AST Aboveground Storage Tank

EPA U.S. Environmental Protection Agency

NPDES National Pollutant Discharge Elimination System

PE Professional Engineer

RWQCB Regional Water Quality Control Board

SPCC Spill Prevention, Control, and Countermeasure

STI Steel Tank Institute

INTRODUCTION

Purpose

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by Dutra Materials to prevent oil discharges from occurring, and to prepare Dutra Materials to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations*, Part 112 (40 CFR part 112).

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

Dutra Materials management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that Dutra Materials must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in Appendix C.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix E.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.
- Amend the SPCC Plan within six (6) months whenever where is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).

Dutra Materials

Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

Part 1: Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

Dutra Materials ("Dutra") is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular review and amendment to the Plan. This SPCC Plan has the full approval of Dutra Materials management. Dutra Materials has committed the necessary resources to implement the measures described in this Plan.

The Facility Manager is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Authorized Facility Representative (facility response coordinator): Ross Campbell

Signature:

Title: Facility Manager
Date: July 3, 2014

1.2 Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [40 CFR 112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan.

| Signature | Professiona | l Engineer Registration Numbe | r |
|-----------|-------------|-------------------------------|---|
| Name | Title | | |
| Company | Date | | |
| | | | |

1.3 Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the office building. The front office is attended whenever the facility is operating, 7:00 AM to 5:00 PM, 5 days per week (closed on weekends).

1.4 Plan Review (40 CFR 112.3 and 112.5)

1.4.1 Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), Dutra Materials periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- commissioning of containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures; or
- changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- change in the name or contact information of spill response or cleanup contractors.

Dutra Materials must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

1.4.2 Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), Dutra Materials reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d).

1.4.3 Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in the Plan Review Log (Table 1-1). This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by *July 3, 2019*.

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

Section 4.2.6 of this Plan describes the inspection program to be implemented by the facility following a regular schedule, including the dates by which each of the bulk storage containers must be tested.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

This SPCC Plan does not follow the exact order presented in 40 CFR part 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC rule. Table 1-2 presents a cross-reference of Plan sections relative to applicable parts of 40 CFR part 112.

Table 1-1: Plan Review Log

| Ву | Date | Activity | PE certification required? | Comments |
|----|------|----------|----------------------------------|----------|
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Table 1-2: SPCC Cross-Reference

| Provision | Plan Section | Page |
|--------------|------------------------------------------------------------------------------------|--------------------------------|
| 112.3(d) | Professional Engineer Certification | 3 |
| 112.3(e) | Location of SPCC Plan | 4 |
| 112.5 | Plan Review | 4 |
| 440.7 | Management Agreement | Table 1-1 |
| 112.7 | Management Approval | 3 Table 4.0 |
| 112.7 | Cross-Reference with SPCC Rule | Table 1-2 |
| 112.7(a)(3) | Part 2: General Facility Information Appendix A: Site Plan and Facility Diagram | 8 Appendix A |
| 112.7(a)(4) | 5.4 Discharge Notification | 32 Appendix I Appendix K |
| 112.7(a)(5) | Part 5: Discharge Response | 32 |
| 112.7(b) | 3.4 Potential Discharge Volumes and Direction of Flow | 13 |
| 112.7(c) | 3.5 Containment and Diversionary Structures | 14 |
| 112.7(d) | 3.6 Practicability of Secondary Containment | 16 |
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| 112.7(e) | 3.7 Inspections, Tests, and Records | 16 Appendix B |
| 112.7(f) | 3.8 Personnel, Training and Discharge Prevention Procedures | 18 |
| 112.7(g) | 3.9 Security | 19 |
| 112.7(h) | 3.10 Tank Truck Loading/Unloading | 19 |
| 112.7(i) | 3.11 Brittle Fracture Evaluation | 22 |
| 112.7(j) | 3.12 Conformance with Applicable State and Local Requirements | 22 |
| 112.8(b) | 4.1 Facility Drainage | 23 |
| 112.8(c)(1) | 4.2.1 Construction | 23 |
| 112.8(c)(2) | 4.2.2 Secondary Containment | 25 |
| 112.8(c)(3) | 4.2.3 Drainage of Diked Areas | 26 Appendix D |
| 112.8(c)(4) | 4.2.4 Corrosion Protection | 26 |
| 112.8(c)(5) | 4.2.5 Partially Buried and Bunkered Storage Tanks | 26 |
| 112.8(c)(6) | 4.2.6 Inspection Appendix B - Facility Inspection Checklists | 26 Appendix C |
| 112.8(c)(7) | 4.2.7 Heating Coils | 27 |
| 112.8(c)(8) | 4.2.8 Overfill Prevention System | 27 |
| 112.8(c)(9) | 4.2.9 Effluent Treatment Facilities | 28 |
| 112.8(c)(10) | 4.2.10 Visible Discharges | 28 |
| 112.8(c)(11) | 4.2.11 Mobile and Portable Containers | 28 |
| 112.8(d) | 4.3 Transfer Operations, Pumping and In-Plant Processes | 29 |
| 112.20(e) | Certification of Substantial Harm Determination | Appendix B |

* Only selected excerpts or relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Dutra Materials

Part 2: General Facility Information

Name: Dutra Materials Company

Address: 3355 Petaluma Blvd. South

Petaluma, CA 94952

Type: Aggregate/Asphalt Plant

Date of Initial Operations: TBD (Summer of 2015)

Owner/Operator: Dutra Group

Primary contact: Ross Campbell

Facility Manager Work:(415) 459-7740

Cell (24 hours): (707) 333-4657

2.1 Facility Description (40 CFR 112.7(a)(3))

2.1.1 Location and Activities

Dutra Materials' Haystack Plant receives pre-processed aggregate, sand, asphaltic oil and recycled asphalt for use in the manufacture and sale of asphaltic concrete and construction aggregates. The rock, sand and recycled asphalt is delivered to the site via barge or truck. Material brought to the site via barge will be offloaded at a neighboring facility and delivered to the site via conveyor. Asphaltic oil is delivered via tanker truck. The rock, sand and recycled asphalt are stored in stockpiles onsite and loaded into the asphalt plant with a loader. Asphaltic oil is stored in heated above ground storage tanks and metered into the plant based on specific product mix designs. The asphalt produced is stored in heated silos and loaded into customer trucks. Aggregate and sand sold to customers is loaded into customer trucks directly from the stockpiles.

Typical hours of operation are between 7:00 AM and 5:00 PM, 5 days per week. Occasionally, depending on local construction demand, the plant may be open throughout the night and weekends. Personnel at the facility include a facility manager, a plant operator, two laborers, a weigh master, and two operations and maintenance personnel.

The Site Plan and Facility Diagram included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (Figure A-2) shows the location of oil containers, buildings, plant structures, and critical spill control structures.

Dutra Materials is located in a primarily industrial area at 3355 Petaluma Blvd. South, Petaluma California. The site is comprised of approximately 38 acres of land and is bordered to the east by the Sonoma Marin Area Rapid Transit (SMART) right of way and the west by Petaluma Blvd South and HWY 101.

The site includes an asphalt plant, a scale house, an aggregate conveyor system, volunteer fire station and product storage and handling areas.

2.1.2 Oil Storage

Asphaltic oil storage at the facility consists of two 30,000 gallon heated ASTs. In addition, the facility has one 500 gallon fuel tank to fuel equipment, one 145 gallon heat transfer oil tank, one 1,000 gallon calibration tank (stores asphaltic oil during calibration testing, otherwise empty) and one 2,000 gallon additive tank. The facility stores a varying stock of oil drums inside the maintenance building.

The capacities of oil containers present at the site are listed below and are also indicated on the facility diagram in Figure A-2. All containers with capacity of 55 gallons or more are included.

Table 2-1: Oil Containers

| ID | Storage capacity | Content | Description |
|------|------------------|---------------|----------------------------------|
| Fixe | d Storage | | |
| 1 | 30,000 gallons | Asphaltic oil | Aboveground vertical tank |
| 2 | 30,000 gallons | Asphaltic oil | Aboveground vertical tank |
| 3 | 1,000 gallons | Asphaltic oil | Aboveground vertical tank |
| 4 | 2,000 gallons | Additive | Aboveground vertical tank |
| 5 | 500 gallons | Diesel | Aboveground horizontal tank |
| 6 | 145 gallons | Hydraulic Oil | Aboveground horizontal tank |
| | | | |
| 7 | 220 gallons | Motor Oil | 55 gallon drums on spill pallets |
| 8 | 220 gallons | Hydraulic Oil | 55 gallon drums on spill pallets |

Total Oil Storage: 64,085 gallons

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located on relatively level terrain. Drainage generally flows in the direction of drainage ditch 1 (DD1), which runs immediately along the south side of the plant and stockpile site. Runoff is treated through a sand filter prior to flowing into the bio swale. The runoff then flows east for approximately 400 feet into the Petaluma River.

Approximately three-quarters of the facility's ground surface area is paved with asphalt. The remainder consists of compacted gravel, grass, and low-lying vegetation.

2.2.2 Discharge History

Table 2-1 summarizes the facility's discharge history.

Table 2-2: Oil Discharge History

| rable 2 2. On Discharge Instary | | | | | |
|---------------------------------|--------------------------|-----------------------------------|--|--|--|
| Description of Discharge | Corrective Actions Taken | Plan for Preventing Recurrence | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

PART 3: Discharge Prevention - General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

The tanks are inspected regularly and following a regular schedule in accordance with the Steel Tank Institute (STI) SP-001 tank inspection standard as described in this Plan. Any leakage from the primary container would be detected through monitoring of the interstitial space performed on a monthly basis. Any leakage from the secondary shell would be detected visually during scheduled visual inspections by facility personnel. Storage drums are elevated on spill pallets and have all sides visible, and any leak would be readily detected by facility personnel before they can cause a discharge to navigable waters or adjoining shorelines. Corrosion poses minimal risk of failure since drums are single-use and remain on site for a relatively short period of time (less than one year). The drum storage area is inspected monthly. This is in accordance with accepted industry practice for drum storage and provides an effective means of verifying container integrity, as noted by EPA in the preamble to the SPCC rule at 67 FR 47120.

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Figure A-1 in Appendix A shows the general location of the facility on a U.S. Geological Survey topographic map. Figure A-2 in Appendix A presents a layout of the facility and the location of storage tanks and drums. The diagram also shows the location of storm water drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of ASTs and drum storage area.

3.3 Spill Reporting (40 CFR 112.7(a)(4))

The discharge notification form included in Appendix I will be completed upon immediate detection of a discharge and prior to reporting a spill to the proper notification contacts.

3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 3-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for different parts of the facility where oil is stored, used, or handled.

Table 3-1: Potential Discharge Volumes and Direction of Flow

| 1 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 | Maximum | | Direction of Flow | | | |
|------------------------------------------------------------------------|-----------------------|--------------------------|-------------------|--------------------------------------------------------------------------------------|--|--|
| | volume | | | | | |
| Potential Event | released (gallons) | Maximum discharge rate | Direction of Flow | Secondary Containment | | |
| Bulk Storage Area (Aboveground Stor | .0 | | | | | |
| Failure of aboveground tank (collapse or puncture below product level) | 30,000 | Gradual to instantaneous | SW to DD1 | Concrete dike | | |
| Tank overfill | 1 to 120 | 60 gal/min | SW to DD1 | Concrete dike | | |
| Pipe failure | 30,000 | 240 gal/min | SW to DD1 | Concrete dike | | |
| Leaking pipe or valve packing | 600 | 1 gal/min | SW to DD1 | Concrete dike | | |
| Loading/Unloading Area | | 1 | 1 | | | |
| Tank truck leak or failure inside the rollover berm | 1 to 2,000 | Gradual to instantaneous | SW to DD1 | Rollover berm, on to oil/water separator | | |
| Tank truck leak or failure outside the rollover berm | 1 to 2,000 | Gradual to instantaneous | SW to DD1 | Rollover berm, on to oil/water separator | | |
| Hose leak during truck loading | 1 to 300 | 60 gal/min | SW to DD1 | Rollover berm | | |
| Fuel Dispensing Areas | | | | | | |
| Tank #5 and diesel dispenser hose/ connections leak | 1 to 150 | 30 gal/minute | SW to DD1 | Land-based spill response capability (spill kit) and oil/water separator | | |
| Maintenance Building | | | | | | |
| Leak or failure of drum | 1 to 55 | Gradual to instantaneous | SW to DD1 | Spill pallets, oil/water separator | | |
| Other Areas | Other Areas | | | | | |
| Complete failure of portable tank (Tank #4) | 500 | Gradual to instantaneous | SW to DD1 | Secondary shell, oil/water separator | | |
| Leaking portable tank or overfills (Tank #4) | 1 to 100 | 3 gal/min | SW to DD1 | Secondary shell, oil/water separator | | |

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

Methods of secondary containment at this facility include a combination of structures (e.g., dike, berm, built-in secondary containment), drainage systems (e.g., oil/water separator), and land-based spill response (e.g., drain covers, sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

- For bulk storage containers (refer to Section 4.2.2 of this Plan):
 - **Dike.** A concrete dike enclosure is provided around fixed aboveground storage tanks, as described in Section 4.2.2 of this Plan.
 - Ouble-wall tank construction. Tank #5 (AST) has double-wall design with a secondary shell designed to contain 110 percent of the inner shell capacity.
 - Spill pallets. Each spill pallet has a capacity of 75 gallons, which can effectively contain the volume of any single 55-gallon drum. Drums are also stored inside the bulk storage area under a roof and are not exposed to precipitation. The floor of the bulk storage area and lower 24 inches of the outside walls are constructed of poured concrete that would restrict the flow of oil.
- In transfer areas and other parts of the facility where a discharge could occur:
 - **Drip pans.** Fill ports for all ASTs are equipped with drip pans to contain small leaks from the piping/hose connections.
 - Sorbent material. Spill cleanup kits that include absorbent material, booms, and other portable barriers are located inside the control shack near the drummed oil storage area and in an outside shed located near the unloading area, as shown on the Facility Diagram in Appendix A. The spill kits are located within close proximity of the oil product storage and handling areas for rapid deployment should a spill occur. Sorbent material, booms, and other portable barriers are stored in the shed next to the loading rack/unloading area to allow for quick deployment in the event of a discharge during loading/unloading activities or any other accidental discharge outside the dike or loading

rack/unloading area, such as from tank vehicles entering/leaving the facility or spills associated with the fuel dispenser. The response equipment inventory for the facility is listed in Appendix J of this Plan. The inventory is checked monthly to ensure that used material is replenished.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

Dutra Materials management has determined that secondary containment is practicable at this facility.

3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

As required by the SPCC rule, Dutra Materials performs the inspections, tests, and evaluations listed in the following table. Table 3-2 summarizes the various types of inspections and tests performed at the facility. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the facility (e.g., Section 4.2.6 for bulk storage containers).

Table 3-2: Inspection and Testing Program

| Table 3-2. Hispection and Testing Program | | | | |
|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|--|--|
| Facility Component | Action | Frequency/Circumstances | | |
| Aboveground container | Test container integrity. Combine visual inspection with another testing technique (non-destructive shell testing). Inspect outside of container for signs of deterioration and discharges. | Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made. | | |
| Container supports and foundation | Inspect container's supports and foundations. | Following a regular schedule (monthly, annual, and during scheduled inspections) and whenever material repairs are made. | | |
| Liquid level sensing devices (overfill) | Test for proper operation. | Monthly | | |
| Diked area | Inspect for signs of deterioration, discharges, or accumulation of oil inside diked areas. | Monthly | | |
| | Visually inspect content for presence of oil. | Prior to draining | | |
| Effluent treatment facilities | Detect possible system upsets that could cause a discharge. | Daily, monthly | | |
| All aboveground valves, piping, and appurtenances | Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. | Monthly | | |

| Facility Component | | Action | Frequency/Circumstances |
|------------------------------|------------|--------|-------------------------|
| Buried metallic storage tank | Leak test. | | Annually |

3.7.1 Daily Inspection

A Dutra Materials employee performs a complete walk-through of the facility each day. This daily visual inspection involves: (1) looking for tank/piping damage or leakage, stained or discolored soils, or excessive accumulation of water in diked and bermed areas; (2) observing the effluent from the oil/water separator; and (3) verifying that the dike drain valve is securely closed.

3.7.2 Monthly Inspection

The checklist provided in Appendix C is used for monthly inspections by Dutra Materials personnel. The monthly inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Verifying the proper functioning of overfill prevention systems.
- Checking the inventory of discharge response equipment and restocking as needed.
- Observing the effluent and measuring the quantity of accumulated oil within the oil/water separator.

All problems regarding tanks, piping, containment, or response equipment must immediately be reported to the Facility Manager. Visible oil leaks from tank walls, piping, or other components must be repaired as soon as possible to prevent a larger spill or a discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the Facility Manager and maintained with this SPCC Plan for a period of three years.

3.7.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and is performed in June of each year using the checklist provided in Appendix C of this Plan.

The annual inspection is preferably performed after a large storm event in order to verify the imperviousness and/or proper functioning of drainage control systems such as dikes, berms, control valves, and the sand filter.

Written annual inspection records are signed by the Facility Manager and maintained with this SPCC Plan for a period of three years.

3.7.4 Periodic Integrity Testing

In addition to the above monthly and annual inspections by facility personnel, Tanks #1, 2, 3, 4, and 7 are periodically evaluated by an outside certified tank inspector following the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks*, SP-001, 2005 version, as described in Section 4.2.6 of this Plan.

3.8 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))

The Facility Manager is the facility designee and is responsible for oil discharge prevention, control, and response preparedness activities at this facility.

Dutra Materials management has instructed oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the Facility Manager for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix E and maintained with this SPCC Plan for a period of three years.

3.9 Security (40 CFR 112.7(g))

The facility has a 16 foot sound/retaining wall located on the eastern edge of the property and a security fence with gates on the frontage road.

Area lights illuminate the unloading and storage areas. Additional motion-activated lights are placed in other areas of the facility. The lights are placed to allow for the discovery of discharges and to deter acts of vandalism.

The electrical starter controls for the oil pumps is located in a closet inside the control shack. The control shack is locked when the plant is not in use. The fuel dispensers will be locked using a numeric code on a security pad. The office and entry gate is locked when the facility is unattended.

3.10 Tank Truck Unloading Requirements (40 CFR 112.7(h))

The potential for discharges during tank truck unloading operations is of particular concern at this facility. Dutra Materials management is committed to ensuring the safe transfer of material to and from storage tanks. The following measures are implemented to prevent oil discharges during tank truck loading and unloading operations.

3.10.1 Secondary Containment (40 CFR 112.7(h)(1))

The facility has an unloading area (where product is unloaded from large capacity tanker truck to the facility bulk storage tanks).

The unloading area is used by outside suppliers making deliveries to the facility.

The tank truck unloading area is surrounded with a 4-inch rollover asphalt berm that provides secondary containment in the event of a discharge during transfer operations. The secondary containment berm is designed to address the more stringent rack containment requirements of 40 CFR 112.7(h), which requires that the berm be sufficient to contain the capacity of the largest compartment, plus freeboard for precipitation. The curbed area provides a catchment capacity of 2,500 gallons, which is capable of containing the largest compartment of the petroleum suppliers truck making deliveries at this facility (maximum 2,000 gallons), and

is also capable of containing the capacity of delivery trucks, which each have a total capacity of 2,000 gallons.

3.10.2 Loading/Unloading Procedures (40 CFR 112.7(h)(2) and (3))

All suppliers must meet the minimum requirements and regulations for tank truck unloading established by the U.S. Department of Transportation. Dutra Materials ensures that the vendor understands the site layout, knows the protocol for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose.

The Facility Manager or his/her designee supervises oil deliveries for all new suppliers, and periodically observes deliveries for existing, approved suppliers.

All loading and unloading of tank vehicles takes place only in the designated unloading area.

Vehicle filling operations are performed by facility personnel trained in proper discharge prevention procedures. The truck driver or facility personnel remain with the vehicle at all times while fuel is being transferred. Transfer operations are performed according to the minimum procedures outlined in Table 3-3. This table is also posted next to the unloading point.

Table 3-3: Fuel Transfer Procedures

| Stage | Tasks |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prior to 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 | Driver must stay with the vehicle at all times during loading/unloading |
| 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 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. |

3.11 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))

All bulk storage tanks at this facility are registered with the state and local authorities and have current certificates of registration and special use permits required by the local fire code.

Storm water runoff is discharged to DD1as permitted under the NPDES permit. Grab samples are taken as required by the SWPPP, following the monitoring requirements specified in the NPDES permit and RWQCB.

PART 4: Discharge Prevention – SPCC Provisions for Onshore Facilities

4.1 Facility Drainage (40 CFR 112.8(b))

Drainage from the concrete dike surrounding tanks 1-8 is restrained by a manually- operated gate valve to prevent a discharge from entering the facility drainage system. The gate valve is normally sealed closed, except when draining the secondary containment structure. The content of the secondary containment dike is inspected by facility personnel prior to draining to ensure that only oil-free water is allowed to enter the facility storm water drainage system. The bypass valve is opened and resealed under direct personnel supervision. Drainage events are recorded in the log included in Appendix D to this SPCC Plan.

Any potential discharge from ASTs will be restrained by secondary containment structures. Discharges occurring during unloading operations will be restrained by the rollover berm.

4.2 Bulk Storage Containers (40 CFR 112.8(c))

Table 4-1 summarizes the construction, volume, and content of bulk storage containers at Dutra Materials facility.

Table 4-1: List of Oil Containers

| Tank | Location | Type (Construction Standard) | Capacity (gallons) | Content | Discharge Prevention & Containment |
|------|-------------------------|------------------------------|-----------------------|------------------|-------------------------------------------------------------------------------------------|
| #1 | Bulk Storage Area | AST vertical | 30,000 | Asphaltic Oil | Concrete dike. Liquid level gauge. |
| #2 | Bulk Storage Area | AST vertical | 30,000 | Asphaltic Oil | Concrete dike. Liquid level gauge. |
| #3 | Bulk Storage Area | AST vertical | 1,000 | Asphaltic Oil | Concrete dike. Liquid level gauge. |
| #4 | Bulk Storage Area | AST vertical | 2,000 | Additive | Concrete dike. Liquid level gauge. |
| #5 | Bulk Storage Area | AST Dual wall | 500 | Diesel | Double-wall. Liquid level gauge, overfill protection system, and interstitial monitoring. |
| #6 | Bulk Storage Area | AST Horizontal | 145 | Hydraulic Oil | Concrete dike. Liquid level guage. |
| #7 | Bulk Storage Area | 55 gallon drums | 220 | Motor Oil | Spill pallets with built-in containment capacity. |
| #8 | Bulk Storage Area | 55 gallon drums | 220 | Hydraulic Oil | Spill pallets with built-in containment capacity. |
| | | | | | |

4.2.1 Construction (40 CFR 112.8(c)(1))

All oil tanks used at this facility are constructed of steel, in accordance with industry specifications as described above. The design and construction of all bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions.

Piping between fixed aboveground bulk storage tanks is made of steel and placed aboveground on appropriate supports designed to minimize erosion and stress.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

A dike is provided around Tanks #1-6. Tanks #1 and #2 each have a 30,000-gallon capacity. Tank #3 has a 1,000-gallon capacity and is raised. Tank #4 has a 2,000-gallon capacity and Tank#5 is double wall tank with 500-gallon capacity. The dike has a total containment capacity of 50,490 gallons to allow sufficient volume for the largest tank and freeboard for precipitation. The freeboard is sufficient to contain a 3.84-inch rainfall corresponding to a 25-year, 24-hour storm event for this region of California, as documented in Appendix F of this Plan. The floor and walls of the containment dike are constructed of poured concrete reinforced with steel. The concrete dike will be built under the supervision of an engineer and in conformance with his specifications to be impervious to oil for a period of 72 hours. The facility is unattended for a maximum of 40 hours (Saturday evening through Monday morning) and therefore any spill into the diked area would be detected before it could escape the diked area. The surface of the concrete floor, the inside and outside of the walls, and the interface of the floor and walls, are visually inspected during the monthly facility inspection to detect any crack, signs of heaving or settlement, or other structural damage that could affect the ability of the dike to contain oil. Any damage is promptly corrected to prevent migration of oil into the ground, or out of the dike.

The 500-gallon portable AST tank is of double-wall construction and provides intrinsic secondary containment for 110 percent of the tank capacity. Since the secondary containment is not open to precipitation, this volume is sufficient to fully contain the product in the event of a leak from the primary container. The interstitial space between the primary and secondary containers is inspected on a monthly basis to detect any leak of product from the primary container.

The 55-gallon drums are placed on covered spill pallets inside the bulk storage area. Each spill pallet provides 75 gallons of containment capacity, which is more than the required 55 gallons for any single drum since the drums are not exposed to precipitation.

4.2.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

The concrete dikes are drained under direct supervision of facility personnel. The accumulated water is observed for signs of oil prior to draining. The gate valves are normally kept in a closed

position and locked except when draining the dike. Dike drainage events are recorded on the form included in Appendix D of this Plan; records are maintained at the facility for at least three

years.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

Cathodic protection is provided for both tanks in accordance with 40 CFR part 280 and meets the requirements of 40 CFR part 112.

Records of pressure tests are kept for at least three years.

4.2.5 Inspections and Tests (40 CFR 112.8(c)(6))

Visual inspections of ASTs by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from tank seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in STI Standard SP-001. The external inspection includes ultrasonic testing of the shell, as specified in the standard, or if recommended by the certified tank inspector to assess the integrity of the tank for continued oil storage.

Records of certified tank inspections are kept at the facility for at least three years. Shell test comparison records are retained for the life of the tanks.

Table 4-2 summarizes inspections and tests performed on bulk storage containers ("EE" indicates that an environmentally equivalent measure is implemented in place of the inspection/test, as discussed in Section 3.1 of this Plan).

Table 4-2: Scope and Frequency of Bulk Storage Containers Inspections and Tests

| | Tank ID | | | | | | | |
|--------------------------------------------------------------------------|---------|--------|--------|--------|--------|--------|--------|--------|
| Inspection/Test | #1 | #2 | #3 | #4 | #5 | #6 | #7 | Drums |
| Visual inspection by facility personnel (as per checklist of Appendix C) | M A | M A | M A | M A | M A | M A | M A | M A |
| External inspection by certified inspector (as per STI Standard SP-001) | 20 yr | 20 yr | 10 yr | EE | 20 yr | 20 yr | 10 yr | EE |
| Internal inspection by certified inspector (as per STI Standard SP-001) | † | † | 20 yr* | EE | 20 yr | 20 yr | 20 yr* | EE |
| Tank tightness test meeting requirements of 40 CFR 280 | 2 yr | 2 yr | 2 yr | 2 yr | 2 yr | 2 yr | | |

Legend: M:

Monthly A: Annual

EE: Inspection not required given use of environmentally equivalent measure (refer to Section 3.1 of this Plan).

4.2.6 Heating Coils (40 CFR 112.8(c)(7))

Exhaust lines from internal heating coils for Tanks #1 and #2 drain to the bulk storage area. The exhaust lines are monitored for signs of leakage as part of the monthly inspection of the facility.

4.2.7 Overfill Prevention Systems (40 CFR 112.8(c)(8))

All tanks are equipped with a direct-reading level gauge. Additionally, all six fixed ASTs are

equipped with high level alarms set at 90 percent of the rated capacity. General secondary containment is provided in the event of overfills, as described in this Plan.

Storage drums are not refilled, and therefore overfill prevention systems do not apply.

Facility personnel are present throughout the filling operations to monitor the product level in the tanks.

^{*} Or earlier, as recommended by the certified inspector based on findings from an external inspection.

[†] Internal inspection may be recommended by the certified inspector based on findings from the external inspection.

4.2.8 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

The facility's storm water effluent discharged into DD1is observed and records maintained according to the frequency required by the NPDES permit (at least once per month) to detect possible discharges.

4.2.9 Visible Discharges (40 CFR 112.8(c)(10))

Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – are quickly corrected upon discovery.

Oil is promptly removed from the diked area and disposed of according to the waste disposal method described in Part 5 of this Plan.

4.2.10 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Small portable oil storage containers, such as 55-gallon drums, are stored inside the maintenance shop where secondary containment is provided by spill pallets. Any discharged material is quickly contained and cleaned up using sorbent pads and appropriate cleaning products.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

Transfer operations at this facility include:

- The filling of facility equipment using the diesel dispenser.
- The transfer of oil from tanker trucks at the unloading area to ASTs.

All buried piping at this facility is cathodically protected against corrosion and is provided with a protective wrapping and coating. When a section of buried line is exposed, it is carefully examined for deterioration. If corrosion damage is found, additional examination and corrective action must be taken as deemed appropriate considering the magnitude of the damage. Additionally, Dutra Materials conducts integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement. Records of all tests are kept at the facility for at least three years.

Lines that are not in service or are on standby for an extended period of time are capped or blank-flanged and marked as to their origin.

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are visually inspected during the monthly inspection of the facility.

All aboveground piping and valves are examined monthly to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. Observations are noted on the monthly inspection checklist provided in this Plan.

Warning signs are posted at appropriate locations throughout the facility to prevent vehicles from damaging aboveground piping and appurtenances. Most of the aboveground piping is located within areas that are not accessible to vehicular traffic (e.g., inside diked area). Brightly painted bollards are placed where needed to prevent vehicular collisions with equipment.

Part 5: Discharge Response

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material:
- Contact the Facility Manager or his/her alternate;
- Contact regulatory authorities and the response organization; and
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H. The list is also posted at prominent locations throughout the facility. A list of discharge response material kept at the facility is included in Appendix J.

5.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil):
- Discharged material is easily stopped and controlled at the time of the discharge;
- Oischarge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Dutra Materials personnel. The following guidelines apply:

- Immediately notify the Facility Manager.
- Under the direction of the Facility Manager, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager will complete the discharge notification form (Appendix I) and attach a copy to this SPCC Plan.

5.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water:
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers must immediately evacuate the discharge site via the designated exit routes and move to the designated staging areas at a safe distance from the discharge. Exit routes are included on the facility diagram and posted in the control shack, and on the outside wall of the scale house that contains the spill response equipment.
- If the Facility Manager is not present at the facility, the senior on-site person notifies the Facility Manager of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge.
- The Facility Manager (or senior on-site person) must call for medical assistance if workers are injured.
- The Facility Manager (or senior on-site person) must notify the Fire Department or Police Department.
- The Facility Manager (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list in Appendix H.

- The Facility Manager (or senior on-site person) must record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
- The Facility Manager (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

5.3 Waste Disposal

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks.

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

5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A summary sheet is included in Appendix I to facilitate reporting. The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of materials released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility (e.g., in the office building, in the maintenance building, and at the loading rack/unloading area).

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a 12-month period. The following information must be submitted to the EPA Regional Administrator and to RWQCB within 60 days:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to RWQCBis included in Appendix K of this Plan.

5.5 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors are provided in Appendix H. These contractors have the necessary equipment to respond to a discharge of oil that affects DD1or adjoining shorelines, including floating booms and oil skimmers.

Spill kits are located at the loading rack/unloading area and inside the maintenance building. The inventory of response supplies and equipment is provided in Appendix J of this Plan. The inventory is verified on a monthly basis. Additional supplies and equipment may be ordered from the following sources:

Freemouw Environmental (800) 559-3274 Water Components (415) 451-1780

Appendix A Site Plan and Facility Diagram

Figure A-1: Site Plan.

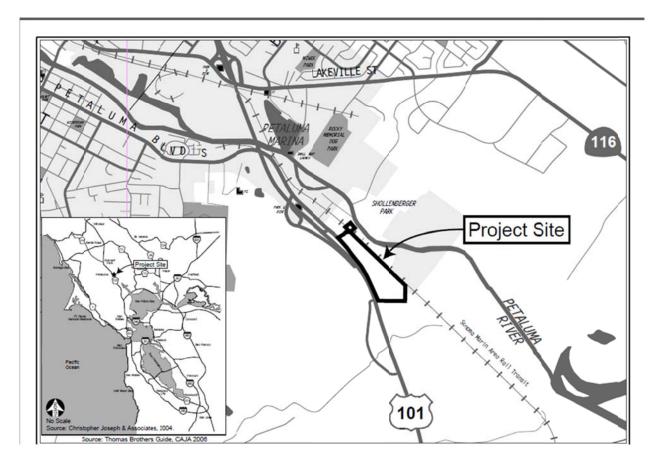
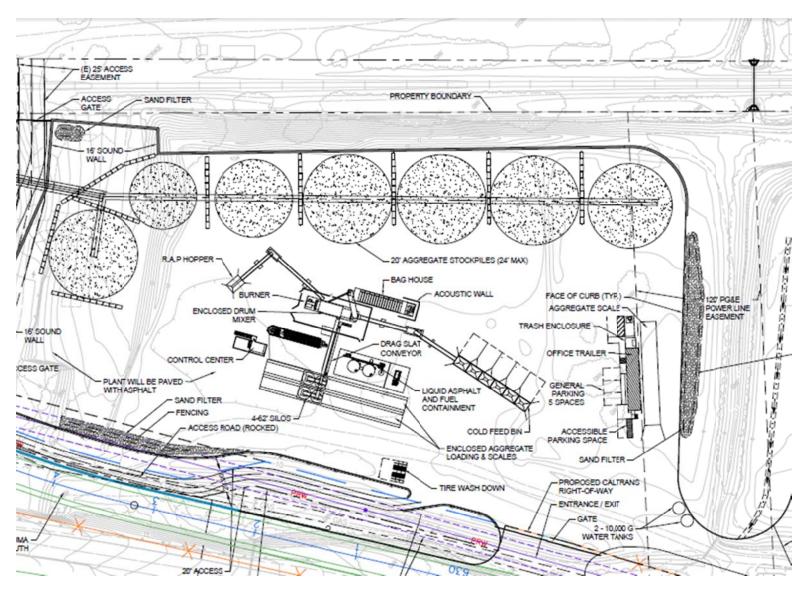


Figure A-2: Facility Diagram.



Appendix B Substantial Harm Determination

| Facility Name: Facility Address: | Dutra Materials 2350 Kerner B Suite 200 San Rafael, C 94901 | Blvd. |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| storage capacity greater than Yes G 2. Does the facility have a tot does the facility lack secondary the largest aboveground oil such any aboveground storage tan Yes G 3. Does the facility have a tot is the facility located at a distance of the facility could cause injury to fix Yes G 4. Does the facility have a tot is the facility located at a distance of the facility have a tot is the facility located at a distance of the facility would shut down a puly Yes G 5. Does the facility have a tot of th | or equal to 42, No O al oil storage ca ry containment torage tank plus k area? No O al oil storage ca ance (as calcula C-III or a comp sh and wildlife a No O al oil storage ca ance (as calcula C-III or a comp blic drinking wa No O al oil storage ca reportable oil s | apacity greater than or equal to 1 million gallons and a that is sufficiently large to contain the capacity of a sufficient freeboard to allow for precipitation within apacity greater than or equal to 1 million gallons and ated using the appropriate formula in 40 CFR part parable formula) such that a discharge from the and sensitive environments? Apacity greater than or equal to 1 million gallons and ated using the appropriate formula in 40 CFR part parable formula) such that a discharge from the |
| information submitted in this | document, and | conally examined and am familiar with the that based on my inquiry of those individuals believe that the submitted information is true, |
| Signature | | Facility Manager Title |
| Name (type or print) | | Date |

APPENDIX C Facility Inspection Checklists

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists must be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

Monthly Inspection Checklist

This inspection record must be completed *each month* except the month in which an annual inspection is performed. Provide further description and comments, if necessary, on a separate sheet of paper and attach to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

| | Y * | N | Description & Comments |
|----------------------------------------------------------|------------|---|------------------------|
| Storage tanks | | | |
| Tank surfaces show signs of leakage | | | |
| Tanks are damaged, rusted or deteriorated | | | |
| Bolts, rivets, or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |
| Vents are obstructed | | | |
| Secondary containment is damaged or stained | | | |
| Water/product in interstice of double-walled tank | | | |
| Dike drainage valve is open or is not locked | | | |
| Piping | | | |
| Valve seals, gaskets, or other appurtenances are leaking | | | |
| Pipelines or supports are damaged or deteriorated | | | |
| Joints, valves and other appurtenances are leaking | | | |
| Buried piping is exposed | | | |
| Loading/unloading and transfer equipment | | | |
| Loading/unloading rack is damaged or deteriorated | | | |
| Connections are not capped or blank-flanged | | | |
| Secondary containment is damaged or stained | | | |
| Berm drainage valve is open or is not locked | | | |
| Oil/water separator | | | |
| Oil/water separator > 2 inches of accumulated oil | | | |
| Oil/water separator effluent has a sheen | | | |
| Security | | | |
| Fencing, gates, or lighting is non-functional | | | |
| Pumps and valves are locked if not in use | | | |
| Response Equipment | | | |
| Response equipment inventory is complete | | | |
| Date: Signate | ure: | | - |

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Annual Facility Inspection Checklist

This inspection record must be completed *each year*. If any response requires further elaboration, provide comments in Description & Comments space provided. Further description and comments, if necessary, must be provided on a separate sheet of paper and attached to this sheet. *Any item that receives "yes" as an answer must be described and addressed immediately.

| | Y* | N | Description & Comments |
|-------------------------------------------|----|---|------------------------|
| Storage tanks | | | |
| Tank #1 | | | |
| Tank surfaces show signs of leakage | | | |
| Tank is damaged, rusted or deteriorated | | | |
| Bolts, rivets or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |
| Vents are obstructed | | | |
| Tank #2 | | | |
| Tank surfaces show signs of leakage | | | |
| Tank is damaged, rusted, or deteriorated | | | |
| Bolts, rivets, or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |
| Vents are obstructed | | | |
| Tank #3 | | | |
| Tank surfaces show signs of leakage | | | |
| Tank is damaged, rusted, or deteriorated | | | |
| Bolts, rivets, or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |
| Vents are obstructed | | | |
| Tank #4 | | | |
| Tank surfaces show signs of leakage | | | |
| Tank is damaged, rusted or deteriorated | | | |
| Bolts, rivets or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |

| | Υ* | N | Description & Comments |
|--------------------------------------------------------|----|---|------------------------|
| Vents are obstructed | | | |
| Oil is present in the interstice | | | |
| Tank #7 | | | |
| Tank surfaces show signs of leakage | | | |
| Tank is damaged, rusted, or deteriorated | | | |
| Bolts, rivets, or seams are damaged | | | |
| Tank supports are deteriorated or buckled | | | |
| Tank foundations have eroded or settled | | | |
| Level gauges or alarms are inoperative | | | |
| Leakage in exhaust from heating coils | | | |
| Concrete dike | | | |
| Secondary containment is stained | | | |
| Dike drainage valve is open or is not locked | | | |
| Dike walls or floors are cracked or are separating | | | |
| Dike is not retaining water (following large rainfall) | | | |
| Piping | • | • | |
| Valve seals or gaskets are leaking | | | |
| Pipelines or supports are damaged or deteriorated | | | |
| Joints, valves and other appurtenances are leaking | | | |
| Buried piping is exposed | | | |
| Out-of-service pipes are not capped | | | |
| Warning signs are missing or damaged | | | |
| Loading/unloading and transfer equipment | | | |
| Loading/unloading rack is damaged or deteriorated | | | |
| Connections are not capped or blank-flanged | | | |
| Rollover berm is damaged or stained | | | |
| Berm drainage valve is open or is not locked | | | |
| Drip pans have accumulated oil or are leaking | | | |
| Oil/water separator | | | |
| Oil/water separator > 2 inches of accumulated oil | | | |
| Oil/water separator effluent has a sheen | | | |
| Security | • | | |
| Fencing, gates, or lighting is non-functional | | | |
| Pumps and valves are not locked (and not in use) | | | |
| Response equipment | | | |
| Response equipment inventory is incomplete | | | |

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- Hold SPCC Briefing for all oil-handling personnel (and update briefing log in the Plan);
- Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed;

| Additional Remarks: | | |
|---------------------|------------|--|
| | | |
| | | |
| | | |
| | | |
| Date: | Signature: | |

APPENDIX D Record of Containment Dike Drainage

This record must be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses the water treatment system. The bypass valve must normally be sealed in closed position. It must be opened and resealed following drainage under responsible supervision.

| Date | Diked Area | Presence of | Time | Time | Signature |
|------|------------|-------------|------|------|-----------|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
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APPENDIX E Record of Annual Discharge Prevention Briefings and Training

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

| Date | Subjects Covered | Employees in Attendance | Instructor(s) |
|------|------------------|-------------------------|---------------|
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APPENDIX F Calculation of Secondary Containment Capacity

The 25 year, 24 hour storm event rainfall intensity is 0.16 inches/hr or 3.84 inches.

Bulk Storage Area Secondary Containment

| Secondary Containment Calc | | | | | |
|--------------------------------------------------------------------------|---------------|---------------|--------------|---------------------------|----------------|
| Tank Displacement Calcs. | | | | | |
| | Quantity | Diameter (ft) | Length (ft) | Width (ft) | Area (SF) |
| 30,000 Gallon Vertical Asphalt Oil Tank | 2 | 11.92 | - | - | 223 |
| 2,000 Gallon Vertical Additive Tank | 1 | 5.04 | _ | - | 20 |
| 500 Gallon Diesel Fuel Tank | 1 | - | 5.58 | 4.08 | 23 |
| 1,000 Gallon Tank | 1 | 0 | n Legs there | efore no displa | cement |
| 145 Gallon Tank | 1 | 0 | n Legs there | efore no displa | cement |
| | | | Total Disp | lacement (SF) | 266 |
| Freeboard Calcs. | | | | | |
| 25 year, 24 hour design storm | | | | | |
| Intensity* | 0.16 | in/hr | | | |
| Freeboard | 3.84 | inches | | | |
| Containment Area Calcs. | Length (ft) | Width (ft) | Depth (ft) | Volume (ft ³) | Volume (gals.) |
| Contaiment Area Volume | 75 | 30 | 3.00 | 6750 | 50490 |
| Less Tank Displacement | | | | 798 | 5967 |
| Less Tank Contents + 10% | | | | 4412 | 33000 |
| Less Precipitation | | | | 720 | 5385.6 |
| Balance | | | | 821 | 6137 |
| Therefore, Secondary Containment has precipitation and tank displacement | sufficient vo | lume to conta | in the conte | nts of the large | est tank plus |
| | | | | | |
| *Sonoma County Water Agency Flood Co | ontrol Design | n Criteria | | | |

APPENDIX G Records of Tank Integrity and Pressure Tests

Attach copies of official records of tank integrity and pressure tests.

APPENDIX H Emergency Contacts

Designated person responsible for spill prevention: Ross Campbell

EMERGENCY TELEPHONE NUMBERS:

Facility
Ross Campbell 707-333-4657

Local Emergency Response

Petaluma Fire Department 707-762-4545

Response/Cleanup Contractors
Freemouw Environmental 800-559-3274

APPENDIX I Discharge Notification Form

| Part A: Discharge Information | | | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|------------------|-------------------------------|--|--|--|
| General information when reporting a spill to outside authorities: Name: Dutra Materials Company Address: 2350 Kerner Blvd. Suite 200 San Rafael CA 94901 Telephone: (415)459-7740 Primary Contact: Ross Campbell , Facility Manager Work: (415)459-7740 Cell (24 hrs): (707)333-4657 | | | | | | |
| Type of oil: | | Discharge Dat | e and Time: | | | |
| Quantity released: | | Discovery Dat | e and Time: | | | |
| Quantity released to a w | vaterbody: | Discharge Dur | ration: | | | |
| Location/Source: | | | | | | |
| Actions taken to stop, re | emove, and mitigate impacts | of the discharge |): | | | |
| Affected media: G air G water G soil | G storm water sewer/POTW G water G dike/berm/oil-water separator | | | | | |
| Notification person: | cation person: Telephone contact: Business: 24-hr: | | | | | |
| Nature of discharges, environmental/health effects, and damages: | | | | | | |
| Injuries, fatalities or evacuation required? | | | | | | |
| Part B: Notification Checklist | | | | | | |
| | | Date and time | Name of person receiving call | | | |
| Discharge in any amou | unt | | | | | |
| | | | | | | |
| Discharge in amount exceeding 10 gallons and not affecting a waterbody or groundwater | | | | | | |

| Local Fire Department Petaluma Fire Department (707)762- 4545 | | |
|------------------------------------------------------------------------|-------------------|-------------|
| | | |
| Discharge in any amount and affecting (or threa | tening to affect) | a waterbody |
| Local Fire Department Petaluma Fire Department (707)762-4545 | | |
| | | |
| National Response Center (800) 424-8802 | | |
| | | |
| | | |
| | | |

^{*} The POTW should be notified of a discharge only if oil has reached or threatens sewer drains that connect to the POTW collection system.

APPENDIX J Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed.

Tank Truck Loading/Unloading Area

| G | Empty 55-gallons drums to hold contaminated material | 4 |
|---|------------------------------------------------------|------------|
| G | Loose absorbent material | 200 pounds |
| G | Absorbent pads | 3 boxes |
| G | Nitrile gloves | 6 pairs |
| G | Neoprene gloves | 6 pairs |
| G | Vinyl/PVC pull-on overboots | 6 pairs |
| G | Non-sparking shovels | 3 |
| G | Brooms | 3 |
| G | Drain seals or mats | 2 |
| G | Sand bags | 12 |

Maintenance Building

| G | Empty 55-gallons drums to hold contaminated material | 1 |
|---|------------------------------------------------------|-----------|
| G | Loose absorbent material | 50 pounds |
| G | Absorbent pads | 1 box |
| G | Nitrile gloves | 2 pairs |
| G | Neoprene gloves | 2 pairs |
| G | Vinyl/PVC pull-on overboots | 2 pairs |
| G | Non-sparking shovels | 1 |
| G | Brooms | 1 |
| G | Drain seals or mats | 1 |

APPENDIX K Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 9 Regional Administrator, and to RWQCB, within 60 days of the qualifying discharge incident.

| Facility: | Dutra Materials |
|-------------------------------|------------------------------------------------------------------------|
| Owner/operator: | Dutra Materials 2350 Kerner Blvd. Suite 200 San Rafael, CA 94901 |
| Name of person filing report: | |
| Location: | 3355 Petaluma Blvd. So Petaluma, CA 94953 |
| Maximum storage capacity: | 64,085 gallons |
| Daily throughput: | 8,000 gallons |

Nature of qualifying incident(s):

- G Discharge to navigable waters or adjoining shorelines exceeding 1,000 gallons
- G Second discharge exceeding 42 gallons within a 12-month period.

Description of facility (attach maps, flow diagrams, and topographical maps):

The facility handles, stores, uses, and distributes petroleum products in the form of gasoline, diesel, No. 2 fuel oil, No. 6 fuel oil, and motor oil. Dutra Materials receives products by common carrier via tanker truck. The products are stored in six aboveground storage tanks (ASTs) and in steel barrells). They are delivered to Dutra Materials by independent contractors. The facility refuels its own onsite equipment from an above ground diesel tank connected to a fueling pump.

Dutra Materials is located in a primarily industrial area at 3355 Petaluma Blvd. South Petaluma California. The site is comprised of approximately 38 acres of land and is bordered to the East by SMART and to the West by Petaluma Blvd. South.

Site improvements include an asphalt plant, a scale house, an aggregate conveyor system and unloading area, and product storage and handling areas. Petroleum products are stored in the bulk storage area.

| A manay Natification Ctandard Danast (a antid) | | |
|---------------------------------------------------------------------------------------------------------------------|--|--|
| Agency Notification Standard Report (cont'd) | | |
| Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred: | | |
| Corrective actions and countermeasures taken, including a description of equipment repairs and replacements: | | |
| Additional preventive measures taken or contemplated to minimize possibility of recurrence: | | |
| Other pertinent information: | | |