

# **SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN**

Pursuant to 40 CFR 112

**FOR**

## **GRAYMONT WESTERN US INC. TACOMA PLANT**

1220 Alexander Avenue  
Tacoma, Washington 98421

May 2025

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## 1.0 GENERAL INFORMATION

### 1.1 PURPOSE

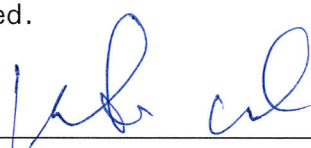
Graymont Western US Inc.'s Tacoma Plant located in Tacoma, Washington has a total aboveground oil storage capacity that is greater than 1,320 gallons and is located next to a major water body, the Blair Waterway. Therefore, a Spill Prevention, Control, and Countermeasure (SPCC) Plan is required for this facility. Figure 1 shows the general location of the facility. This SPCC Plan was developed for the Tacoma Plant and complies with the requirements of 40 CFR Part 112.

### 1.2 MANAGEMENT APPROVAL [112.7]

The signature below certifies that the management of Graymont Western US Inc. (Graymont) fully approves of this SPCC Plan and will commit the necessary resources to fully implement this SPCC Plan as described.

Keith Wiggs

Name

  
Signature

Terminal Supervisor

Title

5/22/2025  
Date

### 1.3 PROFESSIONAL ENGINEER REVIEW [112.3(d)]

SPCC Plans must be reviewed and certified by a Registered Professional Engineer. The Professional Engineer's stamp below certifies that:

- The Professional Engineer is familiar with the requirements of 40 CFR Part 112;
- The Professional Engineer or his or her agent has visited and examined the facility;
- The Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards and with the requirements of 40 CFR Part 112;
- Procedures for required inspections and testing have been established; and,
- The Plan is adequate for the facility.

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 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.

Certifying Engineer:  
State:

Rachel S. Chang  
Washington

Registration Number:

Environmental Engineering No. 41503  
CH2M HILL, Inc.

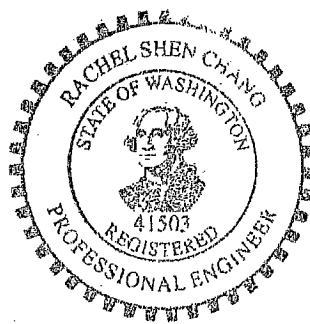
Signature:

Rachel S. Chang

Certification Date:

Dec. 21, 2012

Engineering Seal:



EXPIRES 8/21/2013

## **1.4 SPCC PLAN AVAILABILITY [112.3(e)]**

In accordance with 40 CFR 112.13(e), the Tacoma Plant maintain a complete copy of this SPCC Plan at the facility in the Main Office. The Plan must be made available to United States Environmental Protection Agency (USEPA) representatives for on-site review during normal working hours.

## **1.5 SPCC PLAN REVIEW AND REVISION [112.5 AND 112.6(b)]**

This SPCC Plan must be reviewed and evaluated at least once every five years to ensure its accuracy and to determine if additional or more effective spill prevention and control technology that is applicable to the facility must be added. After this review, this SPCC Plan must be amended within six months as needed. The changes must then be implemented as soon as possible, but no later than six months after amending this Plan.

The Terminal Supervisor will document the completion of the 5-year review and sign a statement as to whether or not this Plan needs to be amended. The review will be documented and noted on Table 1 SPCC Plan Review Log.

The Tacoma Plant must update and amend this SPCC Plan whenever the facility makes a change in the design, construction, operation, or maintenance of the facility that may affect its potential for an oil discharge. Examples of these types of changes that may require amendment of the SPCC Plan include:

- Commissioning or decommissioning tanks
- Replacement, reconstruction, or installation of oil containers
- Construction or demolition that might alter secondary containment structures
- Revision of standard operating or maintenance procedures

Amendments to the plan because of these types of changes are called technical amendments, and must be certified by a Professional Engineer, except as provided in 112.6(a). Non-technical amendments include the following:

- Changes in name or contact information (for example, telephone numbers) for individuals responsible for this SPCC Plan.

Both technical and non-technical amendments must be documented in Table 1 SPCC Review Plan Log. All amendments to this SPCC Plan will be signed and certified by the owner/operator. The Plan must be amended within 6 months of the change. The changes must be fully implemented as soon as possible, but no later than 6 months following the completion of the Plan amendments.

## **1.6 QUALIFIED FACILITIES PLAN REQUIREMENTS [112.6]**

In accordance with the December 2006 and November 2009 amended SPCC rules, if a facility meets the definition of a qualified facility [40CFR 112.3(g)], defined as having

10,000 gallons or less in aggregated oil storage capacity, and having had no single discharge exceeding 1,000 gallons or no two discharges exceeding 42 gallons within any twelve month period in the three years prior to the SPCC Plan date, the facility may self-certify the plan and technical amendments. The facility may not self-certify if the plan amendments includes environmental equivalence or impracticability determination [40 CFR 112.6(b)(3)]. The Graymont Tacoma Plant meets the definition of a qualified facility, but has one item of environmental equivalence; therefore, Graymont is not self-certifying this SPCC Plan.

## **1.7 SPCC PLAN CONFORMANCE [112.7(A)(1)]**

The SPCC Plan for the Tacoma Plant has been prepared in accordance with the requirements in 40 CFR Part 112. The facility will implement and continue to comply with the requirements of this part. Details regarding compliance with the requirements of this Section are contained in this SPCC Plan. This Plan does not follow the sequence specified in 40 CFR Part 112; therefore, a table in Appendix A cross references the requirements in 40 CFR Part 112 with the sections in this Plan.

Graymont will conform to the SPCC requirements as the procedures outlined in this SPCC Plan are implemented and as the compliance schedule is implemented. The compliance schedule is included in Appendix B.

## **1.8 DEVIATION FROM REQUIREMENTS [112.7(a)(2)]**

The Tacoma Plant has not deviated from the requirements of 40 CFR Part 112 except for the following:

Section 112.8(c)(8) requires that bulk storage tanks be provided with one of the level detection devices listed in Sections 112.8(c)(8)(i) through (iv). The Mobile Fuel Tank is not equipped with level detection devices. Instead, the tank is probed manually prior to filling to verify that sufficient space is available to contain the material that will be transferred to the tank. An operator is present at all while diesel is transferred from the Diesel Tank to the Mobile Fuel Tank. The combination of probing the tank manually prior to transferring material to the tank, having the supplier or an operator present during transfers, and the containment that is provided by the facility's yard sumps and collection ponds provides equivalent environmental protection to equipping the tanks with a level detection device.

**TABLE 1: SPCC Plan Review Log**

Date	Certification (per 40 CFR Part 112.5[d])	Reviewer	Signature	Revisions
December 9, 2015	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on November 29, 2012 and will/ will not amend the Plan as a result.	Paul Liner		3
December 12, 2015	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.	Paul Liner		2 Contacts only Page 7 and 17
February 11, 2020	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.	Keith Wiggs		Contacts, titles, plant description
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Plant on _____ and will/ will not amend the Plan as a result.			



**TABLE 1: SPCC Plan Review Log**

Date	Certification (per 40 CFR Part 112.5[d])	Reviewer	Signature	Revisions
	Plan as a result.			
	I have completed review and evaluation of the SPCC Plan for Graymont Tacoma Lime			

## **2.0 FACILITY INFORMATION [112.7(a)(3)]**

### **2.1 FACILITY OWNER AND ADDRESS**

Graymont Western US Inc.  
585 West Southridge Way  
Sandy, UT 84070  
(801) 716-2621

### **2.2 FACILITY OPERATOR AND ADDRESS**

Graymont Western US Inc.  
Tacoma Plant  
1220 Alexander Avenue  
Tacoma, Washington 98421  
(253) 572-7600

### **2.3 FACILITY CONTACTS**

<u>Name</u>	<u>Title</u>	<u>Telephone</u>
Keith Wiggs	Terminal Supervisor	(253) 428-6544

### **2.4 FACILITY DESCRIPTION AND PHYSICAL LAYOUT**

Graymont is located on Lot 12, Block 9 of the Tacoma Tidelands in Tacoma, Washington. The site is nearly flat with a gentle slope to the southwest. The area near the site is predominantly industrial and the nearest surface water is the Blair Waterway (Class B receiving water), which is located adjacent to the property.

Currently, the Graymont plant/terminal processes quicklime and produces hydrated lime products in both bags and bulk. Bagging facilities, bin-bag loading and bulk storage are available for both quicklime and hydrated lime products. These products can be loaded into trucks, railcars or sea-born shipping containers at the plant. Finished lime products can be shipped by truck, rail or barge.

Graymont has the capability to produce quicklime (CaO), hydrated lime (Ca[OH]2), and precipitated calcium carbonate (PCC). The PCC facility and the quicklime production areas have been mothballed but could be operated again in the future.

The Tacoma Terminal discharges process wastewater and stormwater to the Blair Waterway and is operating under NPDES Waste Discharge Permit No. WA-000100-7 (NPDES permit), which became effective on November 1, 2016. Tacoma Plant facilities include warehouses, maintenance shops, and material/equipment storage areas to support processing operations. In order to accommodate onshore fueling and maintenance needs of equipment used in plant operations, including used oil accumulation, two aboveground storage tanks have been installed at centralized locations. No underground storage tanks (UST) containing oil products are located at

this facility. In addition, no transfer stations or connecting pipes are located at the facility. The overall layout of the plant is shown in Figure 2, Site Plan.

Diesel fuel, lube oils, and other types of petroleum products for onshore use are received by tank or package truck from the supplier and are stored on site.

The Tacoma Plant is located within 100 feet of the Blair Waterway in an area known as the Tacoma Tide Flats. To protect the waterway from all onshore activities, local secondary containment for all tanks and barrel storage areas, plant-wide berms, swales, sumps, and settling ponds have been constructed. Facilities have been designed so all drainage is routed from yard sumps to two settling ponds for treatment prior to discharge.

Aboveground storage tanks, drums, containers, and mobile equipment for onshore operations at the plant are sited where a release will be contained within localized secondary containment or drain to regulated yard sumps and settling ponds. The facility layout and surface drainage direction of flow is shown in Figure 3, Site Drainage Plan.

Fueling of the material barge is accomplished by marine transfer from the supplier's tank truck stationed on the pier through hoses running along the pier to the barge fuel tank. Supplier tank trucks and operators for marine transfer operations from supplier tank trucks to the material barge must meet or exceed the minimum requirements and regulations of the USCG as set forth in 33 CFR 154 and 156. The transfer operation is controlled by the supplier in accordance with their United States Coast Guard (USCG)-approved Marine Operations Manual. Response to a release of any oil during this operation will be in accordance with the supplier's Facility Response Plan for Marine Transportation Related (MTR) Facilities. Suppliers for the Tacoma Plant are required to have and have provided approved copies of their Marine Operations Manual and Facility Response Plan for Mobile Marine Transportation Related Facilities.

Table 2 lists the oil storage containers and oil-filled process equipment at the Tacoma Plant that contain 55 gallons or more of oil.

**Table 2: Oil Storage Containers**

Type of Equipment	Container ID	Contents	Oil Capacity (gallons)	Secondary Containment
Bulk Storage Tank	Tank #1	Diesel Fuel	2,500	Double-walled, also within covered concrete containment with 509 gallon capacity
Portable Storage	(1) 350-gallon tote	Used Oils	350	Within covered Concrete containment area measuring 116" x 720" x 4" (>900 gallons)
Portable Storage	(10) 55-gallon Drums	Lube Oils	550	Within covered Concrete containment area measuring 116" x 720" x 4" (>900 gallons)
Portable Storage	(2) 55-gallon Drums	Used Lube Oils	110	On spill containment pallet, under cover.
Portable Storage	Mobile Fuel Tank	Diesel Fuel	100	Double-walled
<b>Oil-filled Equipment (1)</b>				
Transformer	PCC#1	Transformer Oil	336	Yard sumps and settling ponds
Transformer	PCC#2	Transformer Oil	530	Yard sumps and settling ponds
Transformer	PCC#3	Transformer Oil	524	Yard sumps and settling ponds
Transformer	PLS	Transformer Oil	178	Yard sumps and settling ponds
Transformer	Spare	Transformer Oil	334	Yard sumps and settling ponds
Transformer	Kiln	Transformer Oil	515	Yard sumps and settling ponds
Process Equipment	PCC Tank #4 Agitator Gear Box	Heavy Oil	150	Yard sumps and settling ponds
<b>Total Oil Capacity</b>			<b>6,177 gallons</b>	

**NOTES:**

(1) Secondary containment specific to the piece of equipment is not required for oil-filled equipment.

### **3.0 SPILL RESPONSE AND CLEANUP PROCEDURES [112.7(a)(5)]**

Ideally, spill prevention measures would prevent a spill from occurring at the Tacoma Plant; however, a spill may still occur. Minor spills that are confined to small areas will be cleaned up as part of the Tacoma Plant's ordinary operating practices. In cases where a larger spill has occurred, but is confined to the Tacoma Plant property, cleanup will proceed as described below. The procedures will be modified as needed when unforeseen circumstances arise.

#### **3.1 SPILL RESPONSE**

Oil must be prevented from reaching the Blair Waterway, drainage ditches, or any other place where water is flowing. Tacoma Plant personnel will exercise every available option to stop and contain the oil.

##### **3.1.1 Summary of Spill Countermeasures**

- Stop source of flow, when it is safe to do so:
  - Evaluate health hazards in the area.
  - Implement safety-related measures as needed.
  - Remove all ignition sources from the area.
  - Plug and/or close valve(s).
- Confine the spill to prevent the spill from entering waterways:
  - Shut off the pump in the plant yard sump to which the oil will drain.
  - Construct a berm or dig a trench.
  - Plug floor drains or place absorbent material around the oil.
- Notify Supervisor.

##### **3.1.2 Direct Countermeasures**

Countermeasures outlined below have been designed to mitigate the possibility of oil reaching a waterway. Employees will undertake these countermeasures immediately when any oil has the potential to enter any waterway and in case of any large spill.

###### Small Spill:

- Stop spill by plugging and/or closing the valve(s).
- Make sure spill is totally contained.
- Proceed with cleanup as outlined in Section 3.2.

Large Spill:

In the case of a spill of significant size, direct countermeasures include the necessary actions to stop the source of the flow of oil. Dig a trench or dike to confine the spill area or to stop oil from entering a waterway.

#### Spills outside of secondary containment:

Shut off the pump in the plant yard sump to which the oil will drain. This will provide additional containment storage and isolate the settling ponds from the spill.

### **3.2 SPILL CLEANUP**

In conjunction with the countermeasures listed above and the reporting procedures outlined in Section 4.0, cleanup must be initiated immediately following containment of an oil spill.

#### **3.2.1 Cleanup Responsibility**

For small spills (less than 25 gallons), plant employees will cleanup the spill under the direction of the Terminal Supervisor.

For larger spills (over 25 gallons), the Terminal Supervisor and the Corporate Environmental Group will determine if outside help is required, outside contractors will be hired by the Terminal Supervisor or the Corporate Environmental Group.

#### **3.2.2 Cleanup Materials and Equipment**

Sufficient quantities of absorbent material and other cleanup equipment will be maintained at various locations throughout the facility to accomplish cleanup. Spill control equipment on site includes absorbent pads and booms, granular absorbent material, brooms, shovels, and front end loaders. Spill equipment is stored in the Maintenance Shop, on the Pier, near the Kiln Maintenance Area, and at the Diesel Fueling Tank (Tank #2). These locations are identified on the Site Plan in Figure 2. Front end loaders will be dispatched as needed for cleanup.

#### **3.2.3 Cleanup Procedures**

- Never use water to clear away an oil spill! Water will mobilize the spill and require additional cleanup efforts.
- Tacoma Plant personnel are required to anticipate and prevent water from flowing into a spill area, which will make cleanup more difficult. Divert water from a spill area using earthen berms and ditches as needed.
- Oil in yard sumps: remove oil from the sumps using absorbent materials (pads, booms, etc.).
- Oil on the settling ponds: use an absorbent boom to skim the oil off the impounded water prior to discharging water from the ponds.
- Oil spill on gravel or soil: absorb as much of the liquid as possible with absorbent material. Remove all contaminated gravel or soil down to visibly clean material. Place the excavated material in piles for temporary storage.
- Oil spill on solid surfaces: collect free-standing oil and place in leak-proof containers. Clean up remaining oil with absorbent materials and then clean the



area thoroughly with rags that are wetted with a non-hazardous solvent, if needed. Place oil-soaked cleanup materials in leak-proof containers.

- If the spill is large or has reached the Blair Waterway, special cleanup efforts, such as those provided by contractors, may be necessary.

### **3.3 DISPOSAL PROCEDURES [112.7(a)(3)(v)]**

An oil spill is not considered cleaned up until all waste produced during the cleanup activities are properly disposed of. All used cleanup material, such as rags, absorbents, blankets, booms, must be disposed of in accordance with federal, state, and local regulations. Only pre-approved waste disposal sites shall be used to dispose of cleanup materials. General disposal guidelines are listed below; however, check with the Corporate Environmental Group prior to disposing of any cleanup materials.

- Liquid oil that has been collected should be recycled at an offsite facility, if possible, or disposed of at a regulated and licensed facility.
- Ship oily soil that has been excavated to a landfill or soil treatment facility that is permitted to dispose of or treat oil-contaminated soil.
- Dispose of oil-soaked absorbent material in a landfill permitted for this type of industrial waste. Small quantities can be triple bagged and sent to the landfill with approval from the local health department and the landfill.

### **3.4 FOLLOW-UP ACTIONS**

- Complete a Spill Report Form for all spills that must be reported to a regulatory agency and any spill outside of a containment area or building (see Section 4.0 for spill reporting requirements).
- Conduct an investigation as needed to:
  - Determine the cause of the spill;
  - Review the response actions that were taken to identify any improvements for response to future incidents; and,
  - Determine if any measures need to be implemented to prevent another spill.
- Revise this SPCC Plan to reflect any changes at the facility or in operating procedures that result from an evaluation of the spill.
- Replace all spill cleanup equipment that was used during the cleanup of the spill.

### **4.0 SPILL REPORTING [112.7(a)(3)(vi) and 112.7(a)(4)]**

'Spill' is used to reference any spill, discharge, release, or leak of a petroleum product. Spill reporting is very critical and must be performed carefully, accurately, and in a timely manner. Table 3 at the end of this section summarizes the spill reporting information contained in Sections 4.1 through 4.4. A call list with contact names and telephone numbers is located in Table 4.

## **4.1 INTERNAL REPORTING REQUIREMENTS**

Graymont's internal reporting requirement specifies that when a person discovers one of the following spills of petroleum products, that person must report the spill to the Terminal Supervisor:

- A spill greater than 2 gallons outside a secondary containment area or building;
- A spill less than 2 gallons outside a secondary containment area or building that is not immediately cleaned up;
- A spill equal to or greater than 25 gallons inside a secondary containment area or building; or,
- A spill of any size that creates a sheen, film, or discoloration on water or enters, or has the potential to enter, a natural body of water (Blair Waterway, storm drain, etc.)

Terminal SupervisorThe Terminal Supervisor or designee must determine if the spill is a reportable spill or contact the Corporate Environmental Group for assistance. If the spill is reportable, then the Terminal Supervisor must notify the Corporate Environmental Group of the spill. A Spill Report Form must be completed for all reportable spills. A blank form is located in Appendix B. Completed forms will be maintained in the SPCC binder along with this plan. Records and spill report forms must be maintained for a period of five years and be made available for inspection upon request by the USEPA or state agency personnel.

## **4.2 FEDERAL REPORTING REQUIREMENTS**

The Terminal Supervisor or his/her designee will determine if a spill must be reported to a federal agency. If the spill is determined to be reportable, the Terminal Supervisor must notify the Corporate Environmental Group and they will complete the required notifications and will close out all final correspondence with each regulatory agency. Federal reporting requirements are outlined in Sections 4.2.1 and 4.2.2.

### **4.2.1 National Response Center (NRC)**

The NRC must be notified immediately by phone of any oil spill which enters or has the potential to enter a stream or natural body of water or creates an oil sheen, film, or discoloration on the water or adjoining shoreline. 'Immediate' is defined as 'as soon as possible' after the release; this has been interpreted by EPA to be within 15 minutes. Be prepared to provide the following information:

- Your 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 spill
- Types of material(s) released or spilled

- Quantity of materials released or spilled
- Danger or threat posed by the release or spill
- Number and types of injuries (if any)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

#### **4.2.2 USEPA Region 10**

Submit a written report to the EPA Region 10 Regional Administrator if the facility spills more than 1,000 gallons of oil in a single spill event or spills more than 42 gallons of oil in each of two spills within any 12-month period. The written report must be submitted within 60 days of the incident. Submit the written report to:

SPCC Spill Inspector  
USEPA Region 10  
1200 6<sup>th</sup> Avenue  
Seattle, WA 98101  
Attn: Mail Stop ECL116

### **4.3 STATE REPORTING REQUIREMENTS**

The Terminal Supervisor or his/her designee will determine if a spill must be reported to a state agency. If the spill is determined to be reportable, the Terminal Supervisor must notify the Corporate Environmental Group and they will complete the required notifications and will close out all final correspondence with each regulatory agency. State reporting requirements are outlined in Sections 4.3.1 and 4.3.2.

#### **4.3.1 Washington State Department of Ecology**

Immediately notify the regional office of the Washington State Department of Ecology if an oil spill enters any water of the state, including storm or sewer drains, ground water, surface water, and drainage ditches. 'Immediately' is defined as 'as soon as possible' after the release, but no later than 1 hour after discovery of the spill.

#### **4.3.2 Washington Emergency Management Division (EMD)**

Immediately notify the EMD as soon as possible if an oil spill enters any water of the state, including storm or sewer drains, ground water, surface water, and drainage ditches. 'Immediately' is defined as 'as soon as possible' after the release. This has been interpreted by EPA to be within 15 minutes.

### **4.4 LOCAL REPORTING REQUIREMENTS**

If an oil spill enters or has the potential to enter a stream or natural body of water or creates an oil sheen, film, or discoloration on the water or adjoining shoreline, immediately notify the Local Emergency Planning Commission (LEPC). For the

Tacoma Plant, the LEPC is Emergency Services within the Tacoma Fire Department. Provide written follow-up notices to the LEPC as soon as practicable after the release and as more information becomes available.

**Table 3: Oil Spill Reporting Requirements**

QUANTITY SPILLED	SPILL AREA	WHEN TO REPORT	REPORT TYPE	WHO REPORTS SPILL	REPORT SPILL TO:
<2 gallons (if not immediately cleaned up)	Outside a secondary containment area or building	Immediately	Verbal Notification	Person who discovered spill	Internal <sup>(1)</sup>
≥2 gallons					
=or ≥25 gallons	Inside a secondary containment area or building	Immediately	Verbal Notification	Person who discovered spill	Internal <sup>(1)</sup>
Any amount that creates a sheen, film, or discoloration	Any location where a spill enters, or has the potential to enter, a stream or natural body of water (Blair Waterway, storm drain, etc.)	Immediately	Verbal Notification	Person who discovered spill	Internal <sup>(1)</sup>
				Corporate Environmental Group	NRC, LEPC
>42 gallons – twice in any 12-month period	Any water source or outside secondary containment	Within 60 days	Written	Corporate Environmental Group	EPA Region 10
=or >1,000 gallons	Any water source or outside secondary containment	Within 60 days	Written	Corporate Environmental Group	EPA Region 10
Any amount	Waters of the state, including storm drains and drainage ditches	Immediately, no later than 1 hour	Verbal Notification	Corporate Environmental Group	Dept. of Ecology, EMD

**NOTES:**

- <sup>(1)</sup> Person who discovers the spill must notify the Terminal Supervisor. The Terminal Supervisor must notify the Corporate Environmental Group, if the spill is a reportable spill.

**Table 4: Spill Contact Information**

CONTACT NAMES	CONTACT INFORMATION
<b>Facility Contacts:</b> <ul style="list-style-type: none"> <li>• Keith Wiggs</li> <li>• Jessie Cheyne</li> <li>• </li> </ul>	Office: (253) 428-6544 Cell: (253) 381-7090 Cell: (253) 376-0549
<b>Corporate Environmental Group:</b> <ul style="list-style-type: none"> <li>• Nate Stettler, Senior HSE Specialist and Lead Auditor</li> <li>• John Maitland, US Manager, Health, Safety, and Environment</li> </ul>	Office: (801) 716-2621 Cell: (801) 598-8076 Office: (814) 353-2106 Cell: (814) 571-8126
<b>Federal Agency Contact Numbers:</b> <ul style="list-style-type: none"> <li>• National Response Center (NRC)</li> <li>• USEPA Region 10</li> </ul>	(800) 424-8802 (206) 442-1263
<b>State Agency Contact Numbers:</b> <ul style="list-style-type: none"> <li>• Washington Emergency Management Division (EMD)</li> <li>• Washington State Department of Ecology – Southwest Regional Office</li> </ul>	(800) 258-5990 or (800) OILS-911 (360) 407-6300
<b>Local Agency Contact Numbers:</b> <ul style="list-style-type: none"> <li>• Emergency Services (Tacoma Fire Department) – Assistant Fire Chief</li> </ul>	(253) 591-5798 (253) 591-5733 (24-hour number)
<b>Outside Contractors:</b> <ul style="list-style-type: none"> <li>• NRC Environmental and Infrastructure</li> </ul>	(631) 224-9141

## **5.0 SPILL PREDICTIONS, VOLUMES, RATES, AND CONTROL [112.7(b)]**

The initial spill control for all tanks and drum storage areas is localized secondary containment. Tertiary containment for the tanks and drums and containment for all loading/unloading areas and oil-filled process and electrical equipment are provided by the plant-wide berms, swales, yard sumps, and settling ponds. The location and layout of the Tacoma Plant's prevention measures are provided in Figure 2. Any release of oil during marine transfer operations will be responded to by the supplier in accordance with his Facility Response Plan for MTR Facilities.

Table 5, Potential Spill Predictions, Volumes, Rates and Controls, provide the following potential spill information:

- Source
- Type of failure likely for that source
- Volume of the source
- Flow rates out of the source
- Direction of flow
- Secondary containment provided and the capacity of the containment

**Table 5: Spill Predictions, Volumes, Rates, and Controls**

SOURCE	MAJOR TYPE OF FAILURE	TOTAL QUANTITY	RATE (Gallons/hour)	DIRECTION OF FLOW	SECONDARY CONTAINMENT
<b>Aboveground Storage Tanks</b>					
#1 Tank – Fuel Tank	Rupture, Leakage	2,500 gallons	2,500	Within covered secondary containment	Double-walled tank Concrete containment area measuring 96" x 204" x 6" (509 gallons)
<b>Truck Loading/Unloading and Equipment/Barge Fueling</b>					
Tank Truck Unloading to Fuel Tank	Hose Rupture, Overfill, Valve Failure	5,000 gallons*	2,400	Southwest To yard sump	Yard sumps and settling ponds (>5,000 gallons)
Tank Truck Loading from Used Oil Tank	Hose Rupture, Overfill, Valve Failure	5,000 gallons*	2,400	Southwest to yard sump	Yard sumps and settling ponds (>5,000 gallons)
Plant Equipment Fueling from Tank #1 Diesel Fuel Tank	Hose Rupture, Overfill, Valve Failure	550 gallons	550	Within fueling pad or southwest to yard sump	Yard sumps and settling ponds (>550 gallons)
Mobile Equipment Fueling from Mobile Fuel Tank on Barge	Hose Rupture, Overfill	100 gallons	100	On barge	Barge provides secondary containment for fuel transfers that occur on the deck of the barge
Marine Transfer Operation for Barge Fueling	Hose Rupture, Overfill, Valve Failure	5,000 gallons*	2,400	On barge or pier	No containment (Marine transfer, USCG approved)
<b>Other Storage</b>					
Drum Storage Area	Rupture, Puncture	900 gallons (up to 10 55-gallon drums & 1 350 gallon tote)	55	Within covered secondary containment	Concrete containment area measuring 116" x 720" x 4" (>900 gallons)
Kiln Maintenance Area	Rupture, Puncture	110 gallons (2 55-gallon drums)	55	Under cover on containment pallets and/or southwest to yard sump	Yard sumps and settling ponds (>550 gallons)
Mobile Fuel Tank	Rupture, Puncture	100 gallons	100	Within interstitial space between inner and outer walls	Double-walled tank
<b>Oil-filled Electrical or Process Equipment</b>					
Transformers	Rupture, Puncture	See Table 2	Up to 524	To yard sumps	Yard sumps and settling ponds (>524 gallons)
PCC Tank #4 Agitator Gear Box	Rupture, Puncture	150 gallons	150	To yard sumps	Yard sumps and settling ponds (>150 gallons)

\*Maximum compartment size is 2,500 gallons.



## **6.0 SECONDARY CONTAINMENT AND DIVERSIONARY STRUCTURES**

### **6.1 CONTAINMENT AND DIVERSIONARY STRUCTURES [112.7(c)(1)]**

Secondary containment for the tanks and the drum storage areas at the Tacoma Plant consists of localized secondary containment structures constructed of reinforced concrete walls, or concrete pads with curbs or soil berms. Each of these secondary containment areas is capable of containing the volume of oil present in the largest single tank/container. Since all of these containment areas are covered, extra storage for precipitation is not necessary.

The double-walled diesel fuel tank (Tank #1) is contained within a covered reinforced concrete dike. The drum storage area is a concrete pad surrounded by a concrete curb on all four sides. The drum storage area is adjacent to the storage building and is located under a roof.

Containment for onshore fueling facilities, oil loading/unloading areas, and electrical transformers are provided by plant-wide berms, swales, yard sumps, and settling ponds as shown in Figure 2 and as discussed in Sections 2.4 and 5.0.

In addition, spill kits are strategically placed around the facility as shown on Figure 2.

### **6.2 DETERMINATION OF PRACTICABILITY [112.7(d)]**

Secondary containment as described in this SPCC Plan has been determined to be practical for the Tacoma Plant. The facility has constructed secondary containment areas and is currently using the areas for the storage tanks and drums. The plant-wide berms, swales, yard sumps, and settling ponds provide general secondary containment for oil used in operations.

## **7.0 FACILITY DRAINAGE**

### **7.1 DRAINAGE CONTROL FROM STORAGE AREAS [112.8(b)(1) AND (2)]**

The diesel fuel tank (Tank #1) is located within a covered concrete secondary containment area. The containment area was originally equipped with a drain. The drain pipe has been capped with a locked valve. The drum storage area consists of a concrete slab surrounded by a concrete berm and is not equipped with a drain. Up to 10 drums are stored at this location at any one time. The drum storage area is located adjacent to the Storage Building and is fully covered. Two additional drums are stored at the Kiln Maintenance Area. They are stored on containment pallets and are under a cover area.

Typically, water does not accumulate in these secondary containment areas. If water accumulates in the secondary containment areas, it will be removed in accordance with Section 8.3.

### **7.2 DRAINAGE FROM UNDIKED AREAS [112.8(b)(3)]**

All drainage from the plant site is routed by the use of berms, swales, and yard sumps to two settling ponds for treatment prior to discharge as required by the facility NPDES permit.

### 7.3 FACILITY DRAINAGE TREATMENT SYSTEMS [112.8(b)(5)]

Drainage water from the yard sumps and plant process water are treated prior to discharge in order to comply with the pH limits in the facility's NPDES permit. The water is not treated for oil but under goes pH adjustment. If oil is detected in the settling ponds, the oil is removed (see Sections 3.2.3 and 3.3 for removing oil from the settling ponds and disposing of oil-soaked absorbent material).

## 8.0 BULK STORAGE CONTAINERS

### 8.1 MATERIALS OF CONSTRUCTIONS [112.8(c)(1)]

Table 6 lists the bulk storage tanks that are located at the Tacoma Plant. The oil storage tanks are constructed of carbon steel and are compatible with the material which is stored in them. The tanks are constructed to withstand normal operating temperatures and pressures.

**Table 6: Bulk Storage Containers**

BULK STORAGE CONTAINER	CONTAINER CONTENTS	STORAGE PRESSURE	STORAGE TEMPERATURE	MATERIALS OF CONSTRUCTION
Tank #1	Diesel Fuel	Atmospheric	Ambient	Carbon steel
Mobile Fuel Tank	Diesel Fuel	Atmospheric	Ambient	Carbon steel
Drums & Tote	Lube Oils, Diesel Fuel, Used Oil, Coolant, Used rags	Atmospheric	Ambient	Steel, PVC

### 8.2 SECONDARY CONTAINMENT FOR BULK STORAGE CONTAINERS [112.8(c)(2)]

The bulk storage containers listed in Table 6 have been provided with secondary containment. These containment areas and their respective capacities are listed in Table 5. Each of these containment areas is capable of containing the volume of oil present in the largest single tank/container (unless they are double-walled). The secondary containment areas for Tanks #1 and the drums are covered; therefore, precipitation does not typically enter the secondary containment areas. If standing water is found in a secondary containment area, it will be removed in accordance with Section 8.3. The containment areas are inspected during the monthly SPCC inspection, and any debris found in the containment areas during the inspections will be removed.

### 8.3 DRAINAGE OF STORMWATER FROM DIKED AREAS [112.8(c)(3)]

Water that accumulates in the secondary containment areas for Tanks #1 and the drums are pumped from the containment area. Prior to pumping the accumulated water from any secondary containment area, the operator informs the Terminal Supervisor and performs a visual examination of the accumulated water for the presence of any oil or oil sheen. If any oil is present, the oil is removed with the use of absorbent materials (pads, booms, etc.) or skimmed off with a vacuum truck for offsite disposal. Once the oil has been removed, the water will be discharged. The discharged water flows into the yard sumps and is then pumped into the settling ponds.

The operator must record the inspection on the Drainage Discharge Log in Appendix D. Drainage discharge records will be maintained in the SPCC binder or SPCC files for a minimum of five years.

## **8.4 MECHANICAL INTEGRITY TESTING [112.8(c)(6)]**

### **8.4.1 Drums & Tote**

Fifty-five gallon drums and a 350 gallons used oil tote onsite will receive an external visual inspection during the monthly SPCC inspection. The inspector will visually inspect the drums for signs of corrosion (*i.e.*, rust blisters, flakes, pitting). Any drum with severe rust blisters or deep pitting, which may result in a release, will be emptied through normal use and then discarded or have its contents transferred to a drum that is in good condition if the contents of the drum cannot be used in the near future.

Drums are shipped to and from the facility on a regular basis. Since these containers must meet Department of Transportation (DOT) packaging requirements, additional mechanical integrity testing will not be performed.

### **8.4.2 Tanks**

The scope and schedule of certified inspections and tests performed on the Facility's ASTs are specified in Steel Tank Institute (STI) Standard SP-001, Standard for the Inspection of Aboveground Storage Tanks. Tanks #1 and the Mobile Fuel Tank are Category 1 tanks, subject to monthly and annual inspections.

During the monthly and annual inspections, the inspector visually observes all exterior tank surfaces, supports, and foundations for signs of deterioration and/or leaks. Tanks #1 is shop-built tank with a capacity less than 30,000 gallons and are elevated so that all exterior surfaces of the tank can be visually inspected. Tank #1 and the Mobile Fuel Tank are double-walled tanks. Visual external inspection plus checking the interstitial space between the outer and inner walls for liquids will be conducted. Any sign of deterioration or leakage, which may result in a release, is reported to the Terminal Supervisor. Visible oil leaks from tank seams, baskets, and bolts will be promptly repaired.

If Tank #1 shows signs of corrosion, such as deep pitting or severe surface rust below the fill line, which may result in a release, an external inspection of the storage tank will be conducted by an authorized tank inspector within one year and then every 5 years as required by the American Petroleum Institute (API) Standard 653. Additional testing may be performed if determined necessary by an authorized tank inspector.

## **8.5 DISCHARGE PREVENTION FOR BULK STORAGE CONTAINERS [112.8(c)(8)]**

All fixed storage tanks at the Tacoma Plant are loaded/unloaded directly from supplier tank trucks. Prior to filling a tank, the tank is gauged manually to ensure sufficient capacity is available to contain the volume to be delivered. The supplier will hook up fill hoses, check all connections for tightness, and monitor the tank during the entire filling process to ensure that the tank is not over filled. If a problem occurs during the transfer, the supplier will stop the transfer and notify Graymont personnel so that the problem can be corrected. After loading is complete the supplier will empty all the lines, cap the ends of the hoses and return them to the proper storage locations. Any incidental spills will be

cleaned up and absorbents disposed of properly. In addition, the facility manually checks the level in the tanks on a monthly basis.

55-gallon drums are stored vertically in the Drum Storage Area and the Kiln Maintenance Area. The Kiln Maintenance drums are stored on spill containment pallets.

## **8.6 EFFLUENT TREATMENT FACILITIES [112.8(c)(9)]**

The plant drainage system, settling ponds, and outfall are observed and controlled as outlined in the facility's NPDES Permit and during the monthly SPCC inspection.

## **8.7 VISIBLE DISCHARGES [112.8(c)(10)]**

Visible oil leaks from tank seams, and bolts are reported to the Terminal Supervisor and promptly repaired by operational personnel. If repairs cannot be made immediately, temporary repairs are performed until permanent repairs can be made. Operations personnel are required to clean up any released oil.

## **8.8 POSITIONING OF MOBILE OIL STORAGE CONTAINERS [112.8(c)(11)]**

A double-walled mobile fuel tank (100 gallons) is used for fueling loaders on the material barge. This tank is normally stored adjacent to Tank 1 when not in use. The tank is moved to the pier by a fork lift. The fuel is transferred from the tank to mobile equipment that is working on the barge via a flexible hose.

The double wall construction of the tank provides secondary containment for the tank. The barge provides containment for fuel transfers that occur on the deck of the barge.

## **9.0 FACILITY TRANSFER OPERATIONS**

### **9.1 VALVE AND PIPELINE INSPECTIONS [112.8(d)(4)]**

The Tacoma Plant does not have oil piping other than the flexible unloading line for transferring diesel fuel from the Diesel Tank to equipment. Operators visually inspect this line for signs of deterioration and/or leaks during the monthly SPCC inspection. Any sign of deterioration or leakage, which may result in a release, is reported to the Terminal Supervisor. Visible oil leaks at flanges or fittings are promptly repaired.

### **9.2 VEHICLE WARNINGS [112.8(d)(5)]**

When diesel fuel is being transferred to the Diesel Fuel Tank or a barge or used oil is being transferred from Used Oil Tote, vehicles entering the plant will be warned that an oil transfer is occurring and to stay clear of the area.

The Tacoma Plant does not have aboveground oil piping; therefore, vehicles do not have to be warned to avoid contact with aboveground piping.

## **10.0 SITE SECURITY**

### **10.1 FENCING [112.7(g)(1)]**

Portions of the plant boundary are fenced to prevent access from adjacent properties. The facility is not fenced along the waterway.

### **10.2 PIPELINE LOADING/UNLOADING CONNECTIONS SECURELY CAPPED [112.7(g)(4)]**

All loading and unloading connections on storage tanks are capped with threaded or cam type caps. These caps are removed only during filling or draining operations and are replaced at the end of those operations.

### **10.3 LIGHTING ADEQUATE TO DETECT SPILLS [112.7(g)(5)]**

The plant has pole and building mounted yard lights sufficient to illuminate storage, maintenance, and fueling areas for 24-hour operation. These yard lights provide ample lighting to observe any release, vandalism, or equipment problems during nighttime operations.

## **11.0 INSPECTIONS, TESTS AND RECORDS [112.7(e)]**

Operators visually inspect the facility on a continuous basis as part of their routine duties. Any problems or issues that are observed are resolved either immediately upon discovery or through the Tacoma Plant's work order system.

According to the Steel Tank Institute's (STI's) SP-001 Standard for the Inspection of Aboveground Storage Tanks (ASTs), the tanks at the Facility are Category 1 tanks, subject to periodic inspections. These inspections must be performed by a qualified owner's inspector on a monthly and annual basis. Prior to inspections, repair and alteration records and special conditions for each tank shall be reviewed. Formal external inspections are not required for these tanks but will be performed in the event that the tank is damaged by fire, natural disaster, excessive settlement, overpressure, or cracking.

Detailed monthly and annual inspections following the checklists prescribed in STI SP-001 of the ASTs will be initiated in 2010, with provisions for retaining inspection records for 3 years from the date of inspection. Inspection Forms are attached as Appendix C. An inspection of all petroleum product storage tanks, drum storage areas, and corresponding secondary containment systems within the plant are conducted on a monthly basis.

## **12.0 PERSONNEL TRAINING**

### **12.1 INITIAL TRAINING [112.7(f)(1)]**

All employees at the Tacoma Plant who have the potential to handle oil must receive initial SPCC training. All new employees or employees whose job functions changes must receive initial SPCC training within 3 months of beginning their assigned duties. Initial training will consist of classroom and/or hands-on training. The initial training will include the following topics:

- Operation and maintenance of equipment to prevent discharges;

- Spill response, cleanup, and disposal procedures;
- Applicable pollution control laws, rules, and regulations;
- General facility operations; and,
- Contents of this SPCC Plan.

## **12.2 DESIGNATED PERSON [112.7(f)(2)]**

The Terminal Supervisor has been designated as the person who is accountable for spill prevention.

## **12.3 SPILL PREVENTION BRIEFINGS [112.7(f)(3)]**

Oil-handling personnel will receive an annual briefing during a plant safety meeting. In addition, spill prevention issues are discussed regularly at plant safety meetings. In the event of an oil spill, spill prevention procedures outlined in this SPCC Plan will be reviewed after the spill response. As a result, follow-up lessons learned sessions will be held to discuss the particular incident and to develop criteria to improve the spill response process.

## **12.4 TRAINING RECORDS**

Initial and refresher training logs are maintained for all plant personnel and are available for review in the Main Office.

## **13.0 ADDITIONAL REQUIREMENTS [112.7(j)]**

The Tacoma Plant is not subject to the Washington State Department of Ecology Spill Prevention, Preparedness, and Response Rules under WAC Ch. 173-180A-D and 173-181 because the facility does not transfer oil to or from a tank vessel or pipeline and the aboveground storage tanks at the facility are less than 10,000 gallons.

## **14.0 SUBSTANTIAL HARM CERTIFICATION [40 CFR Part 112, Appendix C]**

The Tacoma Plant in Tacoma, Washington does not meet the substantial harm criteria outlined in 40 CFR 112 Appendix C. In accordance with this section, a certification form has been prepared and is located in Appendix E.

## *FIGURES*

## *APPENDIX A*

### *Cross-Reference Table*



**Cross-Reference Table between 40 CFR 112 Requirements and Sections in SPCC Plan**

40 CFR SECTION	PLAN SECTION	TOPIC
112.3(d)	Section 1.3	Professional Engineer's Certification
112.3(e)	Section 1.4	SPCC Plan Availability
112.5(a)	Section 1.5	SPCC Plan Amendments
112.5(b)	Section 1.5	SPCC Plan Review
112.5(c)	Section 1.5	Certification of Technical Amendments
112.7	Section 1.2	Management Approval
112.7(a)(1)	Section 1.7	SPCC Plan Conformance
112.7(a)(2)	Section 1.8	Deviation from Requirements
112.7(a)(3)	Section 2.0	Facility Information and Physical Layout of the Facility
112.7(a)(3)(i)	Section 2.4, Table 2	Contents of each container and its storage capacity
112.7(a)(3)(ii)	Sections 8.5	Discharge prevention measures and procedures for routine handling of products
112.7(a)(3)(iii)	Sections 6.1 and 7.0	Discharge or drainage controls
112.7(a)(3)(iv)	Sections 3.1 and 3.2	Countermeasures for discharge discovery, response, and cleanup
112.7(a)(3)(v)	Section 3.3	Methods of disposal of recovered materials
112.7(a)(3)(vi)	Section 4.0, Table 4	Contact list and phone numbers
112.7(a)(4)	Section 4.0	Spill Reporting
112.7(a)(5)	Section 3.0	Spill Response and Cleanup Procedures
112.7(b)	Section 5.0, Table 5	Potential for Equipment Failure
112.7(c)(1)	Section 6.1	Containment and Diversionary Structures
112.7(d)	Section 6.2	Determination of Practicability
112.7(e)	Section 11.0	Inspections, Tests, and Records
112.7(f)	Section 12.0	Training, Annual Briefings, and Designated Person
112.7(g)(1)	Section 10.1	Site Security – Fencing
112.7(g)(2)	Not applicable	Diesel Tank and Mobile Fuel Tank are not equipped with valves that permit the direct outward flow from the tanks; therefore, this requirement does not apply.
112.7(g)(3)	Not applicable	Diesel Tank and Mobile Fuel Tank have small intrinsically safe electric pumps; the motors have no controls other than the power cord, which remains unplugged when not in use. Therefore, this requirement does not apply.
112.7(g)(4)	Section 10.2	Site Security – Pipeline Loading/Unloading Connections Securely Capped
112.7(g)(5)	Section 10.3	Site Security – Lighting Adequate to Detect Spills
112.7(h)	Not applicable	The Tacoma Plant is not equipped with a tank truck loading/unloading rack. Diesel is transferred from the Diesel Tank via a standpipe, pump, and hand dispenser and transferred to the tank via a flexible hose and hand dispenser.

**Cross-Reference Table between 40 CFR 112 Requirements and Sections in SPCC Plan**

40 CFR SECTION	PLAN SECTION	TOPIC
112.7(i)	Not applicable	The Tacoma Plant does not have any field-constructed aboveground tanks; therefore, this requirement does not apply.
112.7(j)	Section 14.0	Additional Federal, State, or Local Requirements
112.8(b)(1) and (2)	Section 7.1	Valves on Secondary Containment Areas
112.8(b)(3)	Section 7.2	Drainage from Undiked Areas
112.8(b)(4)	Not applicable	Facility drainage from undiked areas is designed to be contained within the yard sumps and/or settling ponds in accordance with Section 112.8(b)(3); therefore, this requirement does not apply.
112.8(b)(5)	Section 7.3	Facility Drainage Treatment Systems
112.8(c)(1)	Section 8.1	Materials of Construction
112.8(c)(2)	Section 8.2	Secondary Container for Bulk Storage Containers
112.8(c)(3)	Section 8.3	Drainage of Stormwater from Diked Areas
112.8(c)(4)	Not applicable	The Tacoma Plant does not have any buried storage tanks onsite; therefore, this requirement does not apply.
112.8(c)(5)	Not applicable	The Tacoma Plant does not have any partially buried or bunkered storage tanks onsite; therefore, this requirement does not apply.
112.8(c)(6)	Section 8.4	Mechanical Integrity Testing
112.8(c)(7)	Not applicable	The storage tanks at the Tacoma Plant are not equipped with internal heating coils; therefore, this requirement does not apply.
112.8(c)(8)	Section 8.5	Discharge Prevention for Bulk Storage Containers
112.8(c)(9)	Section 8.6	Effluent Treatment Facilities
112.8(c)(10)	Section 8.7	Visible Discharges
112.8(c)(11)	Section 8.8	Positioning of Mobile Oil Storage Containers
112.8(d)(1)	Not applicable	The Tacoma Plant does not have any buried piping that is used to transfer oil; therefore, this requirement does not apply.
112.8(d)(2)	Not applicable	The facility does not have oil piping other than the flexible loading/unloading lines.
112.8(d)(3)	Not applicable	No pipe supports are needed due to the very short length of piping associated with the oil storage tanks. Therefore, this requirement does not apply.
112.8(d)(4)	Section 9.1	Valve and Pipeline Inspections
112.8(d)(5)	Section 9.2	Vehicle Warnings
40 CFR 112 Appendix C	Section 16.0, Appendix E	Substantial Harm Certification

*APPENDIX B*  
*Spill Reporting Forms*  
*(Blank and Completed)*

**GRAYMONT  
WESTERN  
US INC.**

## **SPILL REPORTING FORM**

FACILITY NAME: \_\_\_\_\_

SPILL DISCOVERED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_

PERSON REPORTING SPILL: \_\_\_\_\_ TITLE: \_\_\_\_\_

### ***SPILL REPORTING INFORMATION***

WHO WAS NOTIFIED OF THE SPILL? ☐ Supervisor ☐ Terminal Supervisor ☐ Corporate Environmental Group  
☐ Other: \_\_\_\_\_

### ***SPILL INFORMATION***

DATE OF SPILL: \_\_\_\_\_ TIME: \_\_\_\_\_ DURATION OF INCIDENT: \_\_\_\_\_ (hours)

DATE SPILL WAS DISCOVERED: \_\_\_\_\_ TIME: \_\_\_\_\_

MATERIAL SPILLED: \_\_\_\_\_ CONCENTRATION OF MATERIAL (if known): \_\_\_\_\_

ESTIMATED QUANTITY SPILLED: \_\_\_\_\_ (gallons)

WAS A REPORTABLE QUANTITY SPILLED? ☐ YES ☐ NO ☐ N/A – spilled material does not have a reportable quantity

AMOUNT RECOVERED: \_\_\_\_\_ (gallons) AMOUNT UNRECOVERED: \_\_\_\_\_ (gallons)

ESTIMATED QUANTITY THAT WAS RELEASED OR MIGRATED OFFSITE: \_\_\_\_\_ (gallons)

ESTIMATED QUANTITY THAT HAS, OR HAS THE POTENTIAL, TO ENTER WATERS OF THE STATE OR U.S.: \_\_\_\_\_ (gallons)

NAME OF WATER BODY: \_\_\_\_\_

SPILL WAS RELEASED INTO OR ON TO (land, water, air, secondary containment, etc.): \_\_\_\_\_

EXACT LOCATION OF THE SPILL (include type of terrain, nearest waters or drains, etc.): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

IF OUTSIDE SECONDARY CONTAINMENT, WHICH DIRECTION DID THE SPILL TRAVEL? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

WEATHER CONDITIONS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

SOURCE OF THE SPILL: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CAUSE OF THE SPILL (include equipment or activities involved in the spill): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

ACTIONS TAKEN TO CONTAIN THE SPILL: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### SPILL REPORTING FORM (CONTINUED)

#### HAZARD/DAMAGE INFORMATION *(check with the Corporate Environmental Group prior to completing this section)*

IDENTIFY HAZARDS TO HUMAN HEALTH OR ENVIRONMENT POSED BY SPILLED MATERIAL: \_\_\_\_\_

PRECAUTIONS THAT HAVE BEEN OR ARE BEING TAKEN: \_\_\_\_\_

LIST PERSONAL INJURIES, ENVIRONMENTAL DAMAGE, OR PROPERTY DAMAGE CAUSED BY THE SPILL (environmental damage includes impacts to wildlife, wetlands, or other environmental resources): \_\_\_\_\_

EVACUATION NEEDED? ☐ YES ☐ NO IF YES, DESCRIBE ACTIONS TAKEN: \_\_\_\_\_

#### SPILL CLEANUP & DISPOSAL INFORMATION

OUTSIDE CONTRACTOR USED FOR SPILL CLEAN UP? ☐ YES ☐ NO IF YES, WHO? \_\_\_\_\_

CLEAN UP ACTIONS TAKEN OR TO BE TAKEN: \_\_\_\_\_

EFFECTIVENESS OF CLEANUP ACTIVITIES: \_\_\_\_\_

METHOD(S) OF DISPOSAL OF SPILL CLEANUP MATERIAL(S): \_\_\_\_\_

#### SPILL FOLLOW-UP

CORRECTIVE ACTION(S) TAKEN OR TO BE IMPLEMENTED TO PREVENT FUTURE OCCURRENCES: \_\_\_\_\_

WAS THE SPCC PLAN REVIEWED AFTER THIS SPILL (applies to oil spills only)? ☐ YES ☐ NO ☐ N/A

DOES THE SPCC PLAN REQUIRE MODIFICATION (applies to oil spills only)? ☐ YES ☐ NO ☐ N/A

IF YES, DATE MODIFICATIONS WERE COMPLETED: \_\_\_\_\_

WAS THE SWPPP REVIEWED AFTER THIS SPILL? ☐ YES ☐ NO ☐ N/A

DOES THE SWPPP REQUIRE MODIFICATION? ☐ YES ☐ NO ☐ N/A

IF YES, DATE MODIFICATIONS WERE COMPLETED: \_\_\_\_\_

SIGNATURE:

DATE:

*APPENDIX C*  
*SPCC Inspection Procedure*  
*And*  
*Inspection Logs*

## ***Monthly SPCC Inspection Procedure***

Perform a monthly SPCC inspection in accordance with the following procedure. After completing an inspection, fill in the log sheet on the following page. An entry in the log sheet is required for each monthly inspection.

1. Inspect the Diesel Tank and Mobile Fuel Tank for the following items:
  - a. Signs of deterioration on exterior surfaces (*i.e.*, discoloration or flaking of coating, shell distortion, localized corrosion at welds, general corrosion, severe corrosion or pitting, hairline cracks, rivets or bolts out of place, bulges, etc.). Any deterioration that may result in a release must be reported and repaired as needed.
  - b. Damage or deterioration of supports, foundation, or anchor bolts (*i.e.*, cracking, distortion, buckling of supports or saddle, signs of settling, corrosion, pitting, vehicle damage, etc.). Any damage that may result in a release must be reported and repaired as needed.
  - c. Deterioration or leakage at tanks connections. Any deterioration that may result in a release must be reported and repaired as needed.
  - d. Signs of leakage on tank, foundation, or supports. Any signs of leakage must be reported as required and repaired as needed.
  - e. Tank valves in closed position when not in use.
  - f. Signs of deterioration or leakage on the flexible diesel fuel line.
  - g. Diesel tank is centered over the containment area.
  - h. Pressure relief devices, emergency vents, or relief vents, if equipped, are clean and free of obstructions, if equipped.
2. Check the interstitial space between the inner and outer walls of the Mobile Fuel Tank for any signs of diesel fuel.
3. Inspect external surfaces on drums and oil-filled equipment (agitator gear box and transformers).
  - a. Report any signs of leakage or damage to the oil-filled equipment and make repairs as needed.
  - b. If a drum has severe rust blisters or deep pitting, which may result in a release, empty drum through normal use and then discard it or have its contents transferred to a drum that is in good condition if the contents of the drum cannot be used in the near future.
4. Inspect the Diesel Tank and the Drum Storage Area secondary containment areas for:
  - a. Signs of leakage or spills, such as stained surfaces or accumulations of oil. Report any leakage or spills as required.
  - b. Containment walls, floors, and curbs are intact and are not cracked. Surfaces should be free of cracks. If they are cracked, repair damaged surfaces.
  - c. Debris. Remove any debris that is located in containment areas.
5. Inspect loading/unloading areas for spills or accumulation of petroleum products. Clean up and report any spills in accordance with Sections 3.0 and 4.0.
6. Inspect swales, yard sumps, or settling ponds for signs of oil or petroleum products (*e.g.*, film, sheen, discoloration). If oil or petroleum product is present, the material must be removed prior to discharging water from the settling ponds.
7. Inspect fence lines and gates for damage. Repair fence lines and gates as needed.
8. Check facility lighting to ensure that it is working properly.
9. Inspect spill kits to ensure that the kits contain the necessary spill clean up materials.

**TABLE C-1**  
**Monthly SPCC Inspection Log**

Inspection Date: \_\_\_\_\_ Retain Until Date (3 years): \_\_\_\_\_

Prior Inspection Date: \_\_\_\_\_

Inspector Name: \_\_\_\_\_

	Bulk Storage	Portable Storage	Oil-Filled Equipment
	#1 Tank - Diesel Tank	Mobile Fuel Tank	PCC #1PCC #2PCC #3PLSKinSpareKilnAgitator Gear Box
Please respond with YES or NO, the response in [BOLD] requires further explanation and/or corrective action.			
1. Inspect for the following items:			
a. Are there signs of deterioration on exterior surfaces (i.e., discoloration or flaking of coating, shell distortion, localized corrosion at welds, general corrosion, severe corrosion or pitting, hairline cracks, rivets or bolts out of place, bulges, etc.)? [YES]			
b. Are there signs of damage or deterioration of supports, foundation, or anchor bolts (i.e., cracking, distortion, buckling of supports or saddle, signs of settling, corrosion, pitting, vehicle damage, etc.)? [YES]			
c. Are there signs of deterioration or leakage at tanks connections? [YES]			
d. Are there signs of leakage on tank, foundation, or supports? Any signs of leakage must be reported as required and repaired as needed. [YES]			
e. Are Tank valves in closed position when not in use? [NO]			
f. Are there signs of deterioration or leakage on the flexible diesel fuel line? [YES]			
g. Is the diesel tank centered over the containment area? [NO]			
h. Pressure relief devices, emergency vents, or relief vents, if equipped, are clean and free of obstructions, if equipped? [NO]			
2. Do the interstitial space between the inner and outer walls have any sign of diesel fuel? [YES]			
3. Inspect external surfaces for the following:			
a. Are there signs of leakage or damage to the oil-filled equipment? [YES]			
b. Do drums have severe rust blisters or deep pitting, which may result in a release? [YES]			
c. Are drums properly stored in secondary containment and labeled? [NO]			
4. Inspect the secondary containment areas for:			
a. Are there signs of leakage or spills, such as stained surfaces or accumulations of oil? [YES]			
b. Are containment walls, floors, and curbs intact and not cracked? Are surfaces free of cracks? [NO]			
c. Is containment area free of debris? [NO]			
d. Are oil containers within 50ft of a door on secondary containment? [NO]			
5. Inspect loading/unloading areas. Are there signs of spills or accumulation of petroleum products? [YES]			



TABLE C-1

Monthly SPCC Inspection Log

Inspection Date: \_\_\_\_\_

Retain Until Date (3 years): \_\_\_\_\_

Prior Inspection Date: \_\_\_\_\_

Inspector Name: \_\_\_\_\_

6. Inspect swales, yard sumps, or settling ponds. Are there signs of oil or petroleum products (e.g., film, sheen, discoloration)? <b>[YES]</b>	
7. Inspect fence lines and gates for damage. Do the fence lines and gates require repairs? <b>[YES]</b>	
8. Is the facility lighting working properly? <b>[NO]</b>	
9. Inspect spill kits. Do the kits contain the necessary spill clean up materials? <b>[NO]</b>	

Comments/Corrective Action:

TABLE C-2

## Annual Tank Inspection Log

Tank name: \_\_\_\_\_ Tank Material and Construction Method: \_\_\_\_\_

Tank diameter & height and volume: \_\_\_\_\_ Secondary containment volume: \_\_\_\_\_

Inspection Date: \_\_\_\_\_ Retain Until Date (3 years): \_\_\_\_\_

Prior Inspection Date: \_\_\_\_\_ Inspector Name: \_\_\_\_\_

**Instructions:** Check Yes/Satisfactory or No/Unsatisfactory. If certain items do not apply, check N/A.

Item	YES/ SAT	NO/ UNSAT	N/A	Comments	Proposed Corrective Action
Leaks from tank					
Piping leak					
Stained soil					
Dike condition					
Visible sheen on standing water in dikes					
If not, was the standing water drained? Document all draining.					
Storm water drains away					
Is the dike valve closed & locked? Or is the plug in place?					
Tank label condition					
Condition of piping					
Valves locked closed when not in use					
Drawoffs locked closed when not in use					
<b>Tank shell and roof:</b>					
Discoloration					
Corrosion					
Cracks					
Bulging					
Paint					
<b>Tank foundation:</b>					

TABLE C-2

## Annual Tank Inspection Log

Tank name: \_\_\_\_\_ Tank Material and Construction Method: \_\_\_\_\_

Tank diameter & height and volume: \_\_\_\_\_ Secondary containment volume: \_\_\_\_\_

Inspection Date: \_\_\_\_\_ Retain Until Date (3 years): \_\_\_\_\_

Prior Inspection Date: \_\_\_\_\_ Inspector Name: \_\_\_\_\_

**Instructions:** Check Yes/Satisfactory or No/Unsatisfactory. If certain items do not apply, check N/A.

Item	YES/ SAT	NO/ UNSAT	N/A	Comments	Proposed Corrective Action
Cracking of ring wall					
Uneven settlement					
Cracking of cradle					
Loosened anchor bolts					
All openings liquid tight					
Check for water level in tank					
Drain water drawoff					
Roof vents clear					
PV vent operates freely					
Level gauging equipment condition					
Oil spill response and clean up supplies available					
Leak detection equipment condition					
Leaks from equipment					
Stained concrete/wood/gravel					
Drainage unimpeded					
Safety equipment in place and operative					
Grounding clamps and cables condition					
Electrical equipment condition					
Fire extinguishers in place					
No smoking signs					

TABLE C-2

Annual Tank Inspection Log

Tank name: \_\_\_\_\_ Tank Material and Construction Method: \_\_\_\_\_

Tank diameter & height and volume: \_\_\_\_\_ Secondary containment volume: \_\_\_\_\_

Inspection Date: \_\_\_\_\_ Retain Until Date (3 years): \_\_\_\_\_

Prior Inspection Date: \_\_\_\_\_ Inspector Name: \_\_\_\_\_

Instructions: Check Yes/Satisfactory or No/Unsatisfactory. If certain items do not apply, check N/A.

Item	YES/ SAT	NO/ UNSAT	N/A	Comments	Proposed Corrective Action
Condition of signage					

*APPENDIX D*

*Drainage Discharge Log Sheet*

[illegible]

### 1 – Tank #1 Secondary Containment Area

## 2-Drum Storage Secondary Containment Area

## *APPENDIX E*

### *Substantial Harm Certification*



## Certification of the Applicability of the Substantial Harm Criteria

Facility Name: Graymont Western US Inc. – Tacoma Plant

Facility Address: 1220 Alexander Avenue, Tacoma, Washington 98421

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

Yes \_\_\_\_\_ No X \_\_\_\_\_

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

Yes \_\_\_\_\_ No X \_\_\_\_\_

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

Yes \_\_\_\_\_ No X \_\_\_\_\_

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

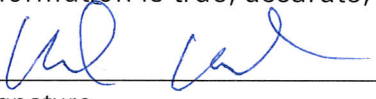
Yes \_\_\_\_\_ No X \_\_\_\_\_

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

Yes \_\_\_\_\_ No X \_\_\_\_\_

### Certification

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

  
\_\_\_\_\_  
Signature

Keith Wiggs  
\_\_\_\_\_  
Name (please type or print)

Terminal Supervisor  
\_\_\_\_\_  
Title

5/22/2025  
\_\_\_\_\_  
Date