SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

BOROUGH OF WESTWOOD
DEPARTMENT OF PUBLIC WORKS
235 HARRINGTON AVENUE
WESTWOOD, NEW JERSEY

Our File No. WW-460A

Prepared for:

Westwood Department of Public Works

Prepared by:

BOSWELL MCCLAVE ENGINEERING

ENGINEERS • PLANNERS • SURVEYORS • SCIENTISTS

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INTRODUCTION

Purpose

The U.S. Environmental Protection Agency (EPA) has promulgated regulations on oil pollution prevention in an effort to prevent discharges of oil to the nation's waters. The regulations were originally published in the Federal Register on 11 December 1973, and are further identified as 40 CFR Part 112. The regulations on oil pollution prevention apply to non-transportation related facilities that reasonably could be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines, and that have an aggregate oil storage capacity of over 1,320 gallons aboveground or 42,000 gallons underground. The Westwood Department of Public Works (DPW) is a facility to which 40 CFR Part 112 applies. The main requirement for this facility is the preparation and implementation of an Oil Spill Prevention, Control and Countermeasure (SPCC) Plan to prevent any discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. This SPCC Plan is prepared to address the regulatory provisions 40 CFR Part 112 for the Westwood DPW Facility in Westwood, New Jersey. The SPCC Plan is not required to be filed with the EPA.

The Westwood DPW 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 D*** of this Plan.

A copy of this plan must be maintained on-site and will be made available to the EPA Regional Administrator for review during normal working hours.

This SPCC Plan will be amended whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of petroleum into or upon navigable waters of the United States or adjoining shorelines. Such amendments must be prepared within six (6) months, and implemented as soon as possible, but no later than six (6) months following preparation of the amendment. Each required Plan amendment would be subject to review and certification by a New Jersey Licensed Professional Engineer (PE), if applicable, and approval by management. [§112.5(a)].

The SPCC plan must be submitted to the EPA Regional Administrator and the New Jersey Department of Environmental Protection-Bureau of Emergency Response (NJDEP-BER) along with other information specified in 40 CFR 112.4 if either of the following occurs:

- The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single event; or,
- The facility discharges more than 42 gallons of oil in each of two (2) discharge events within any 12-month period.

Discharge information must be reported to the EPA Regional Administrator and the NJDEP-BER within 60-days if either of the above thresholds is reached. The report must contain the following information as applicable:

- Name of facility;
- Name(s) of the owner or operator of the facility;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective actions and/or countermeasures taken, including a description of equipment, repairs and/or replacements;

- An adequate description of the facility, including maps, flow diagrams, topographical maps as necessary, and diagrams which show the location of any exempted tanks;
- The cause of the discharge, including a failure analysis of the system or subsystem that failed;
- Additional preventative measures taken or contemplated to minimize the possibility of recurrences; and,
- Such other information the EPA Regional Administrator may require pertinent to the Plan or discharge.

Part 1 Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

The Westwood DPW is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this SPCC Plan. This SPCC Plan has the full approval of the Borough of Westwood (Borough). The Borough has committed the necessary resources to implement the measures described in this Plan.

The DPW Superintendent, 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 Borough Representative:

Richard Woods
Superintendent
Borough of Westwood DPW

Date:

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

I hereby attest and certify that: (i) I am familiar with the requirements of 40 CFR part 112; (ii) I (or my agent) have visited and examined the facility; (iii) this SPCC plan for the Westwood DPW located at 235 Harrington Avenue, Westwood, NJ 07675 has been prepared in accordance with the requirements of 40 CFR part 112; (iv) procedures for required inspection and testing has been established in the SPCC plan; and (v) this SPCC plan is adequate for the facility (40 CFR 112.3(d)).

This certification does not relieve the facility of its duty to implement this SPCC plan in accordance with 40 CFR 112. [§ 112.3(d)(1); § 112.3 (d)(2)].

Name: Stephen T. Boswell, Ph.D., P.E., SECB, LSRP
License №: 24GE03468000
State
Date:

Signature

Seal

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 DPW office. The office is attended during normal business hours (i.e., 7:00 AM to 3:00 PM, Monday – Friday).

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), the Borough 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 New Jersey Licensed PE. Non-technical amendments can be completed (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.

The Borough must make the needed revisions to the SPCC Plan as soon as possible, but no later than six (6) months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six (6) months* from the date of the amendment. The DPW Superintendent 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), the Borough reviews this SPCC Plan at least once every five (5) years. Revisions to the Plan, if needed, are made within six (6) months of the five (5) year review. A New Jersey Licensed PE 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.

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

By	Date	Activity	PE certification required?	Comments

Previous PE certifications of this Plan are summarized below.

Date	Scope	PE Name	Licensing State and Registration No.

Table 1-2: SPCC Cross-Reference

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112.8(d)	4.3 Transfer Operations, Pumping and In-Plant Processes	20
112.20(e)	Certification of Substantial Harm Determination	Appendix D

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

Part 2 General Facility Information

Facility Name: Westwood DPW

Street Address: 235 Harrington Avenue
Westwood, New Jersey 07675

Mailing Address: Same as above

Owner: Borough of Westwood

Operator: Westwood DPW
235 Harrington Avenue
Westwood, New Jersey 07675

Facility Contacts:

Name	Title	Phone (office & cell)
Richard Woods	DPW Superintendent	201-664-2349 201-522-3802

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

2.1.1 Location and Activities

The Westwood Department of Public Works (DPW) is located at 235 Harrington Avenue, Block 1701, Lot 1, in the Borough of Westwood, Bergen County, New Jersey. The United States Geological Survey Quadrangle map depicting the facility location is provided as ***Figure 1***. The facility is owned by the Borough of Westwood. The 30.6-acre site contains one (1) main building housing the DPW offices, Ambulance Corps and maintenance garage. Additionally, the property contains a gasoline and diesel fueling station, vehicle storage garage and borough recreation fields.

The Westwood DPW is bordered by Pascack Brook to the north and east, ballfields to the south, and Harrington Avenue/Cedar Lane to the west. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, revised September 30, 2005, the facility lies within the 100-year flood zone.

The DPW hours of operation are Monday through Friday from 7:00 am to 3:00 pm. The DPW building is locked during non-operating hours however the facility entrance remains open at all times so that Westwood police officers and other authorized emergency personnel can access the fueling station after hours.

2.1.2 Oil Storage

The Westwood DPW's fixed oil storage includes one (1) 2,000 gallon diesel fuel aboveground storage tank (AST), one (1) 2,000 gallon gasoline AST, and one (1) 1,000 gallon diesel fuel AST used to fuel facility equipment; one (1) 275 gallon waste vegetable oil AST used to fuel the garage building's ceiling-hung heater. Portable oil storage consists of 250 gallon totes stored at the vehicle storage garage. Additionally, a varying number of oil drums is stored inside the repair garage and vehicle storage garage buildings.

The capacities of oil containers present at the site are listed in Table 2-1. All containers having a capacity of 55 gallons or more are included, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.

Table 2-1: Oil Containers and Capacities [§112.7(a)(3)(i)]:			
This table includes a complete list of all oil storage containers (aboveground containers and completely buried tanks) with capacity of 55 U.S. gallons or more.			
ID	**Content**	**Description**	**Storage capacity (gallons)**
1	Gasoline	Aboveground double wall horizontal tank at fueling area	2,000
2	Diesel	Aboveground double wall horizontal tank at fueling area	2,000
3	Diesel	Aboveground double wall horizontal tank at fueling area	1,000
4	Waste Vegetable oil	Aboveground double wall horizontal tank at repair garage	275
A	Lube oil, waste vegetable oil, used oil	55 gallon drums in repair garage (variable stock; up to 20 drums on site at any time)	1,100
	Waste Vegetable oil	250-gallon poly totes in repair garage (variable stock; up to four (4) totes on site at any time).	1,000
B	Waste Vegetable oil	250-gallon poly totes in vehicle storage garage (variable stock; up to 12 totes on site at any time).	3,000
		Total Aboveground Storage Capacity	10,375 gallons
		Total Completely Buried Storage Capacity	0 gallons
		Facility Total Oil Storage Capacity	**10,375 gallons**

2.2 Evaluation of Discharge Potential

2.2.1 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

Surface drainage at the fueling station is via overland flow along gravel and asphalt-paved roadways. Any discharge from the fueling operation could potentially flow 400' across the asphalt pavement to a stormwater inlet located northeast of the DPW garage. The stormwater system discharges to the Pascack Brook approximately 500' to the east. The Pascack Brook eventually outlets to Oradell Reservoir, onstream with the Hackensack River. Overland flow at the fueling area could also potentially travel north along the paved driveway at the west side of the DPW building and either to stormwater inlets north of the DPW building (approximately 260') or overland flow through the vegetated area along the Pascack Brook (approximately 320'). The Pascack Brook is classified by the NJDEP as a Category-1 Water (C-1).

The 55-gallon lubricating oil drums are stored inside the repair garage on plastic spill pallets, which would trap and contain any oil dripping or spilled from the containers. The waste motor oil drums are stored in 85-gallon poly drums set inside a concrete-bermed area which would trap and contain any oil dripping or that spilled from the containers. Waste vegetable oil drums are stored in the repair garage.

The 250-gallon waste vegetable oil totes are stored inside the vehicle maintenance garage.

There are no floor drains in the garage or vehicle storage buildings.

A plan depicting each potential source area and direction of stormwater drainage is included as ***Figure 2*** of this SPCC Plan.

2.2.2 Discharge History

The Westwood DPW has had no historical events of significant oil releases. With the exception of routine drips and spills encountered during maintenance activities, there have been no events of oil releases which would warrant notification to the EPA Regional Administrator.

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))

Non-destructive integrity evaluation is performed annually on Tanks #1, #2 & #3. Tank #4 is double wall steel and is elevated off the ground. 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 totes and drums are stored inside buildings and have all sides visible. Any leak would be readily detected by facility personnel before they result in 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 (1) year). The drum storage areas are inspected monthly. This inspection frequency 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))

As required under 40 CFR 112.7(a)(3), the Site Plan included as ***Figure 2*** illustrates the facility's layout including the location of oil containers, buildings, loading/unloading and transfer areas, and critical spill control structures.

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

In the event of discharge, the person who is at the scene must first contact the DPW Superintendent Manager or his/her alternate. The DPW Superintendent Manager must then follow the emergency response procedures as described in ***Appendix A***.

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

Tank #1: 2,000 Gallon Gasoline Tank at Fueling Area

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate
Failure of aboveground tank	Contained within the secondary tank	Up to 2,000 gallons	Gradual to instantaneous
Tank overfill	Contained within the spill box	1 to several gallons	Up to 5 gallons per minute
Hose leak or failure during equipment filling	Radially on ground	1 to several gallons	Up to 3.5 gallons per minute
Overfill of equipment being fueled	Radially on concrete pad	1 to several gallons	Up to 1 gallon per minute

Tank # 2: 2,000 Gallon Diesel Tank at Fueling Area

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate
Failure of aboveground tank	Contained within the secondary tank	Up to 2,000 gallons	Gradual to instantaneous
Tank overfill	Contained in spill box	1 to several gallons	Up to 5 gallons per minute
Hose leak or failure during equipment filling	Radially on ground	1 to several gallons	Up to 3.5 gallons per minute
Overfill of equipment being fueled	Radially on concrete pad	1 to several gallons	Up to 1 gallon per minute

Tank #3: 1,000 Gallon Diesel Tank at Fueling Area

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate
Failure of aboveground tank	Contained within the secondary tank	Up to 1,000 gallons	Gradual to instantaneous
Tank overfill	Contained within the spill box	1 to several gallons	Up to 5 gallons per minute
Hose leak or failure during equipment filling	Radially on ground	1 to several gallons	Up to 3.5 gallons per minute
Overfill of equipment	Radially on concrete pad	1 to several gallons	Up to 1 gallon per minute

Tank # 4: 275 Gallon Waste Vegetable Oil

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate
Failure of aboveground tank	Contained within the secondary spill containment	Up to 275 gallons	Gradual to instantaneous
Tank overfill	Inside of garage	Up to 275 gallons	Up to 1 gallon per minute
Hose leak or failure during equipment filling	Inside of garage	1 to several gallons	Up to 1 gallon per minute
Overfill of equipment being fueled	Inside of garage	1 to several gallons	Up to 1 gallon per minute

Storage Area A: Repair Garage

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate Gradual to
Failure of tote	Within garage	Up to 250 gallons	Gradual to instantaneous
Leak or failure of drum	Within concrete dike, spill pallet or radially on concrete floor	1-55 gallons	Gradual to instantaneous
Overfill or spillage during fluid transfer	Contained within spill pallet, concrete curb or radially on concrete floor	1 to several gallons	Up to 1 gallon per minute

Storage Area B: Vehicle Storage Garage

Potential Event	Discharge Direction	Maximum Volume Released	Maximum Discharge Rate Gradual to
Leak or failure of tote	Inside of building	Up to 250 gallons	Gradual to instantaneous
Spillage during transfer	Inside of building	1 to 5 gallons	Up to 5 gallons

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. curbing, built-in secondary containment), and land-based spill response (e.g., booms, sorbents) to prevent oil from reaching navigable waters and adjoining shorelines:

Tank #1: 2,000 gallon Gasoline AST/ Tank #2: 2,000 gallon Diesel Fuel AST/ Tank #3: 1,000 gallon Diesel Fuel AST

Tanks 1, 2 and 3 are located at the fueling area southwest of the repair garage. The tanks are constructed of a steel inner tank encased in a reinforced concrete monolithic chamber. Each tank has 5-gallon spill containment around the fill pipes. Additionally, an emergency dispenser shutoff button is located at the fueling area on the key card reader. In the event of a spill, the area surrounding the facility would be protected by immediately placing granular absorbent and/or sand around the spill. The ASTs are used for fueling Borough vehicles including DPW, police and school buses. Fuel to the dispensers is conveyed via single-wall steel underground piping which is pressure tested once every two (2) years. Pumps, nozzles and hoses are maintained in proper working order. Topping off of fuel tanks is prohibited, per Borough Policy.

Tank #4: 275 gallon Waste Vegetable Oil AST

A 275 gallon double wall steel AST located in the repair garage is used to fuel a ceiling-hung heater. All piping to the heater is aboveground.

Storage Area A: Repair Garage

Storage Area A is located inside the repair garage and is where the DPW stores totes and drums containing lubricating oil, hydraulic oil, waste vegetable oil and waste motor oil. The building has a poured concrete floor. The 55 gallon waste oil drums at Storage Area A are stored inside 85 gallon poly drums set inside a concrete curbed containment area with sufficient height to contain a complete release from the largest container. The 55 gallon motor oil and hydraulic oil drums are stored on spill pallets. The tops of the 55 gallon drums contain absorbent pads to absorb potential spills during fluid transfer.

Storage Area B: Vehicle Storage Garage

Storage Area B is located inside the vehicle storage garage which has a poured concrete floor. The 250 gallon totes are stored inside the building.

Tank Truck Transfers

Delivery trucks offload fuel oil into the 2,000 gallon and 1,000 gallon tanks. Truck drivers enter and exit the property through the front gates. All delivery vehicles must have on-board spill kits. During fuel deliveries, DPW personnel are present and fueling operations are not left unattended. All fuel transfers follow OSHA procedures for grounding and clearing of lines prior to engagement and disengagement of filling operations.

General Facility

Petroleum absorbent pads and granular absorbents are readily available throughout the facility. Additionally, they are also stored in transfer areas, and in other areas of the facility where a discharge could occur. The facility's response equipment inventory is listed in ***Appendix F*** of this Plan. The inventory is checked monthly to ensure that used material is replenished.

3.6 DEMONSTRATION OF PRACTICABILITY – 40 CFR 112.7(d)

The facility personnel have determined that use of the containment structures or readily available equipment to prevent discharged oil from reaching the navigable waters is practical and effective.

3.7 INSPECTIONS, TESTS AND RECORDS – 40 CFR 112.7(e)

As required by the SPCC rule, the Borough performs the following inspections, tests and evaluations at the facility. The inspections and tests are also described in Section 4.2.6.

3.7.1 Daily Inspection

Borough employees inspect the facility each day. This daily visual inspection consists of a site walk through to examine for damage/leakage at tanks and portable containers and stained/discolored soils.

3.7.2 Monthly Inspection

The inspection procedures/checklist in ***Appendix C,*** is used to conduct the required monthly inspections. 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; and,
- Checking the inventory of discharge response equipment and restocking as needed.

Any problems regarding the tanks, piping, containment or response equipment must immediately be reported to the DPW Superintendent. 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.

Completed monthly reports shall be signed by the DPW Superintendent and maintained with this Plan for three (3) years.

3.7.3 Periodic Integrity Testing

The underground piping from the ASTs to the dispensers is single-wall galvanized steel. The piping is tested every two (2) years for tightness. Tightness testing is performed on Tanks 1, 2 and 3 annually. All testing is in accordance with EPA Standard Test Procedures for Evaluating Leak Detection Methods

(EPA/530/UST-90/004 through 010).

The shear valves and mechanical leak detectors at the gasoline and diesel fuel dispensers are tested every two (2) years by a NJDEP certified company.

Testing records are maintained with this SPCC Plan for a period of three (3) years.

3.8 PERSONNEL TRAINING – 40 CFR 112.7(f)

- The appropriate facility personal are instructed by management in the operation and maintenance of oil pollution prevention equipment and pollution control laws and regulations.
- The DPW Superintendent is accountable for oil discharge prevention.
- Yearly discharge prevention briefings are provided by facility management for the appropriate operating personnel to ensure adequate understanding of the SPCC Plan. These briefings include a discussion of any past discharge events or failures, any recently developed precautionary measures. Records of the briefings and discharge prevention training are kept on the form included in ***Appendix E*** and maintained with this SPCC Plan for a period of at least three (3) years.

3.9 SECURITY – 40 CFR 112.7(g)

The portion of the facility, where the petroleum storage tanks are located, is surrounded by a chain-link fence with a locking gate. The gate is locked when the facility is not in operation. Facility lighting is placed to deter acts of vandalism and allow for the discovery of discharges. The facility is routinely patrolled by the Westwood Police. The police fuel their vehicles at the DPW, thereby providing additional security.

3.10 TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK – 40 CFR 112.7(h)

NOT APPLICABLE

3.11 FIELD-CONSTRUCTED ABOVEGROUND STORAGE TANKS – 40 CFR 112.7(i)

NOT APPLICABLE

3.12 CONFORMANCE TO APPLICABLE GUIDELINES – 40 CFR 112.7(j)

The requirements of 40 CFR 112 are in conformance with all State agency requirements and are the most stringent rules, regulations and guidelines. This SPCC Plan was prepared in conformance with the requirements of 40 CFR 112.

Part 4: Discharge Prevention – SPCC Provisions for Onshore Facilities (Excluding Production Facilities)

4.1 Facility Drainage (40 CFR 112.8(b))

NOT APPLICABLE

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

Table 4-1 summarizes the construction, volume and content of bulk storage containers at the Westwood DPW:

Table 4-1: List of Oil Containers

Tank ID	Location	Type (Construction Standard)	Capacity (gallons)	Content	Discharge Prevention & Containment
1	Fueling Area	AST horizontal	2,000	Gasoline	Concrete secondary containment. Liquid level gauge.
2	Fueling Area	AST horizontal	2,000	Diesel	Concrete secondary containment. Liquid level gauge.
3	Fueling Area	AST horizontal	1,000	Diesel	Concrete secondary containment. Liquid level gauge.
4	Repair Garage	AST horizontal	275	Waste Vegetable oil	Double wall steel, Liquid level gauge.
A	Repair Garage	Steel drums	55	Motor oil, and hydraulic oil	Spill pallets with built-in containment. Building also serves as containment.
A	Repair Garage	Steel drums	55	Used oil	85 gallon poly overpack drum in concrete curbed area. Building also serves as containment.
A	Repair Garage	Poly drums	55	Waste Vegetable oil	Building serves as containment.
A	Repair Garage	Poly totes	250	Waste Vegetable oil	Building serves as containment.
B	Vehicle Storage Garage	Poly totes	250	Waste Vegetable oil	Building serves as containment.

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

All fixed oil tanks used at this facility are constructed of steel in accordance with industry specifications. 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. Prior to entering service, all bulk storage containers are inspected for material compatibility.

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

Bulk storage containers are constructed with integrated containment, have portable containment or are storage buildings capable of containing the entire content of the largest container.

- The filling of all bulk storage containers shall be conducted under the supervision of facility personnel who can directly observe the liquid level in the container.
- Oil leaks that result in a loss of oil from bulk storage container seams, gaskets, rivets, bolts and valves shall be promptly corrected. Oil leaked and accumulated in containment areas shall be promptly removed.
- Any oil spills occurring during transfer operations are quickly contained and cleaned up using granular absorbents or sorbent pads and appropriate cleaning products.

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

This section is not applicable since there are no diked areas at this facility.

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

This section is not applicable since there are no underground storage tanks at this facility.

4.2.5 Partially Buried and Bunkered Storage Tanks (40 CFR 112.8(c)(5))

This section is not applicable since there are no partially buried or bunkered storage tanks at this facility.

4.2.6 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 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 (3) years ***(Appendix G)***. The scope and schedule of certified inspections and tests performed on the facility's ASTs are specified in NFPA 30. Table 4-2 summarizes inspections and tests performed on bulk storage containers.

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

Inspection/Test	Tank #1	Tank #2	Tank #3	Tank #4	Dispenser shear valve & line leak detector	Underground piping
Visual inspection by facility personnel (as per checklist of Appendix C)	M	M	M	M	M	-
Tightness testing by NJDEP certified testing firm	A	A	A	-	A	Every 2 years

Legend: M: Monthly
A: Annual

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

This section is not applicable since there are no heating coils used at this facility.

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

Tanks #1, #2, #3 and #4 are equipped with direct-reading level gauges. Additionally, Tanks #1, #2 and #3 have ball float vent valves installed to prevent overfilling. The 250 gallon totes, do not have an overfill prevention system. General secondary containment is provided in the event of overfills, as described in this Plan.

Storage drums containing lubricating and hydraulic oil are not refilled, and therefore overfill prevention systems do not apply. Drums containing waste oil are filled by fluid transfers of less than 5 gallons at a time. Fluid transfers are performed using spill funnels and the drums are stored atop spill pallets.

Liquid level sensing devices are tested on a monthly basis during the monthly inspection of the facility, following manufacturer recommendations. Venting capacity is suitable for the fill and withdrawal rates.

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

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

The Westwood DPW is not required to maintain any New Jersey Pollutant Discharge Elimination System (NJPDES) Permits since there are no non-stormwater or industrial discharges associated with their facility operations.

4.2.10 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.

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

Small portable oil storage containers, such as 55 gallon drums, are stored inside the repair garage where secondary containment is provided by spill pallets or concrete curbing and the floor is sloped to drain away from the door. 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 following:

4.3.1 Gasoline/Diesel Fuel Transfers

Delivery trucks offload oil into the ASTs located at the Fueling Area southwest of the office building. The fuel delivery truck drivers enter and exit the main gates. The fuel delivery personnel are required to actively monitor the filling operations and not to leave the filling operations unattended for any period.

Delivery vehicles must have on-board spill kits. All fuel transfers follow OSHA procedures for grounding and clearing of lines prior to engagement and prior to disengagement of filling operations. Facility personnel are present during fuel deliveries and post-fueling inspections are conducted.

4.3.2 Used Oil Storage and Removal

Transfers from drums containing waste oil occur via a vacuum tank truck for disposal at a licensed facility. These transfers occur at the repair garage building, which is a covered location. Removal of waste oil is conducted by an outside licensed waste oil hauler and is transported to a licensed waste oil disposal facility.

4.3.3 Lubricating Oil/Waste Vegetable Oil Delivery and Storage

Waste vegetable oil is delivered by truck in 250 gallon portable totes and 55 gallon drums. Lubricating oils are delivered by truck in 55 gallon drums. The totes and drums are offloaded using onsite equipment. The drums are stored in the repair garage. The 250 gallon totes are located in the repair garage and vehicle storage building.

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 Federal and State laws. Immediate action must be taken to control, contain, and recover discharged product.

Discharge Notification (40 CFR 112.7(a)(4))

In the event of a discharge, the person who is at the scene shall first contact the DPW Superintendent. The DPW Superintendent and/or representative shall then follow the emergency response procedures as described in ***Appendix A***.

In general, should a leak and/or spill occur the following steps are to be taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Summon the appropriate assistance to limit the migration of the release through the use of booms, temporary dikes and absorbent materials;
- Notify DPW Superintendent or his/her alternate of the situation;
- Notify **Bergen County Hazmat: 911;**
- Bergen County Hazmat will summon appropriate emergency/spill contractor resources as needed;
- Notify **NJDEP Spill Hotline** within 15 minutes: **1-877-WARN DEP (927-6337).**
- Notify Bergen County **Environmental Joint Insurance Fund (EJIF): 1-800-289-6681** and leave a message. An EJIF representative will return your call, generally within 15 minutes; and
- Collect and dispose of recovered products according to regulation.

Emergency Contacts:

Reference ***Appendix B – Emergency Contact Numbers*** for the appropriate contact numbers. This list is also posted at prominent locations throughout the facility.

Cleanup Contractors and Equipment Suppliers

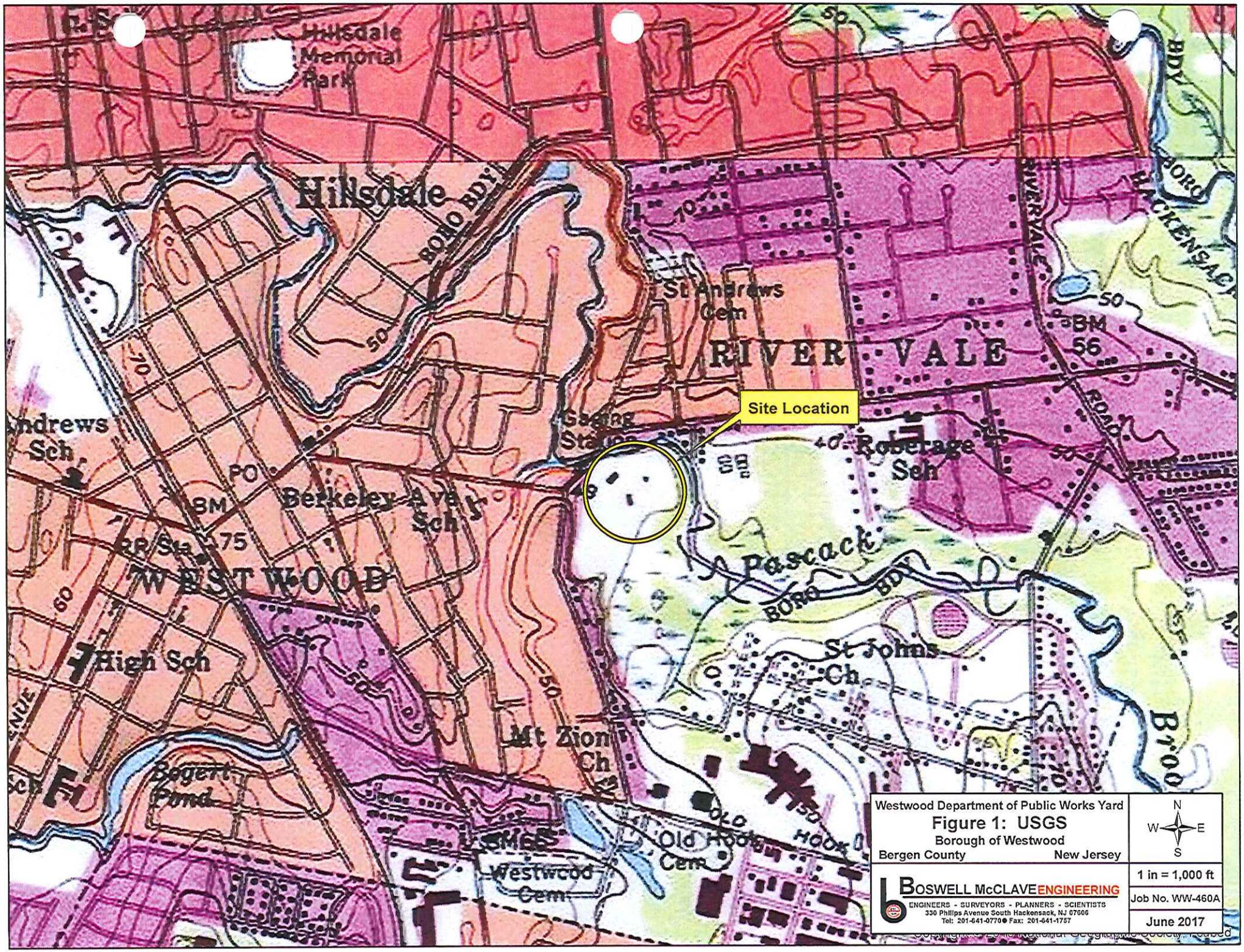
Specialized spill response and cleanup contractors will be provided through Bergen County Hazmat ***Appendix B.*** These contractors have the necessary equipment to respond to a discharge of oil.

Spill kits are located in the repair garage. A list of discharge response material kept at the facility is included in ***Appendix F***.

Disposal of Recovered Materials

All material recovered from a release shall either be recycled onsite or disposed of through an appropriately licensed disposal contractor.

Figure 1
United States Geological Survey Map



Westwood Department of Public Works Yard

Figure 1: USGS

Borough of Westwood

Bergen County New Jersey

N W E S

1 in = 1,000 ft

BOSWELL McCLAVE ENGINEERING

ENGINEERS - SURVEYORS - PLANNERS - SCIENTISTS

330 Phillips Avenue South Hackensack, NJ 07606

Tel: 201-641-0770 Fax: 201-641-1757

Job No. WW-460A

June 2017

Figure 2
Facility Site Plan

Pascack Brook
FW2-NTC1
Vehicle Storage Building
Storage Area "B"
10-12 250 gal Waste Vegetable Oil Totes
Tank 4: 275 gal
Waste Vegetable Oil AST
Repair Garage "A"
15-20 55 gal Drums
2-4 250 gal Waste Vegetable Oil Totes
Tank 1: 2,000 gal
Gasoline AST
Fuel Dispensers
Tank 2: 2,000 gal
Diesel Fuel AST
Tank 3: 1,000 gal
Diesel Fuel AST
Stormwater Inlet
Estimated Spill Flow Direction
AST Above Ground Storage Tank
Westwood Department of Public Works Yard
Figure 2: Facility Site Plan
Borough of Westwood
Bergen County New Jersey
N
W E
S
BOSWELL McCLAVE ENGINEERING
ENGINEERS - SURVEYORS - PLANNERS - SCIENTISTS
330 Phillips Avenue South Hackensack, NJ 07606
Tel: 201-641-0770 Fax: 201-641-1757
1 in = 60 ft
Job No. WW-460A
June 2017

APPENDIX A
Emergency Procedures and Notifications

EMERGENCY PROCEDURES AND NOTIFICATIONS

The following is a description of the immediate actions to be taken by facility personnel in the event of an oil spill or a discharge to navigable waters or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]:

1. Shutdown pumping in event of a spill during any fuel transfer operation or an emergency at the fuel dispensers. **Know locations of emergency shut offs**.

2. Eliminate potential sources of ignition such as open flames or sparks.

3. If possible, safe, and trained to do so, identify and secure source of the discharge and contain the discharge with sorbents, sand, or other material from the spill kits located at the following areas:

   - Repair Garage.

IN THE EVENT OF AN ENVIRONMENTAL EMERGENCY, INITIATE EMERGENCY PHONE CALLS IN THE FOLLOWING ORDER:

1. Contact local Hazmat Response Team by calling **911**

   The proper information to be relayed is as follows:

   - The exact address or location and phone number of the facility;
   - The date and time of the discharge;
   - The type of material discharged;
   - Estimate of the total quantity discharged;
   - The source of the discharge;
   - Description of affected media;
   - The cause of the discharge;
   - Damages or injuries caused by the discharge; and,
   - Whether evacuation is needed and names of parties who have also been contacted.

2. If the spill impacts soil, water or groundwater, contact the NJDEP Spill Hotline within 15 minutes of detection at **1-877-WARN DEP (927-6337)**

3. Call the EJIF Emergency Hotline: **1-800-289-6681** and leave a message. An EJIF representative will return your call, generally within 15 minutes.

4. Take names of all involved personnel and third parties and, if possible, take photographs of any suspicious situations or potential causes of the spill.

Site: **WESTWOOD DEPARTMENT OF PUBLIC WORKS**
235 HARRINGTON AVENUE
WESTWOOD, NEW JERSEY 07675
PHONE (Office) 201-664-2349

APPENDIX B
Emergency Contact Information

EMERGENCY CONTACT INFORMATION

Organization	Contact:	Phone Number:
NJDEP	Spill Hotline	1-877-927-6337
National Response Center	Emergency	1-800-424-8802
Fire Department	Non-Emergency	201-664-0526
	Emergency	911
Police Department	Non-Emergency	201-664-7000
	Emergency	911
EJIF Hotline	Emergency	1-800-289-6681
Bergen County Haz-Mat	Emergency	911
	Non-Emergency	201-634-2780
Key Facility Personnel		
Designated Person Accountable for Spill Prevention	Richard Woods - DPW Superintendent	201-664-2349 (Office) 201-522-3802 (Cell)

APPENDIX C
Facility Inspection Checklist

MONTHLY FACILITY INSPECTION CHECKLIST

Date: _____ Time: _____ Inspector: _____	X = Satisfactory NA = Not Applicable 0 = Repair or Adjustment Required C = See comment under Remarks/Recommendations

Drainage

_____ Any noticeable oil sheen or runoff.

ASTs

_____ Tank surfaces checked for signs of leakage.
_____ Tank condition good (no rusting, corrosion, pitting).
_____ Bolts, rivets, or seams are not damaged.
_____ Tank foundation intact.
_____ Leak detection gauges working properly.
_____ Level gauges and alarms working properly.
_____ Vents are not obstructed.
_____ Valves, flanges, and gaskets are free from leaks.
_____ Containment walls are intact.
_____ Spill containment clear of liquid/debris.
_____ No liquids in interstitial space.

Piping and Dispensers

_____ No signs of corrosion damage to piping or supports.
_____ Buried pipelines are not exposed.
_____ Out-of-service pipes capped.
_____ Signs/barriers to protect piping from vehicles are in place.
_____ No leaks at valves, flanges or other fittings.
_____ General condition of hoses.
_____ No liquids in dispenser sump.

Security

_____ Fence and gates intact.
_____ Gates have locks.
_____ ASTs locked when not in use.
_____ Starter controls for pumps locked when not in use.
_____ Lighting is working properly.

Training

_____ Spill prevention briefing held.
_____ Training records are in order.

Remarks/Recommendations: _____

_____

_____

APPENDIX D
Certification of the Applicability of the Substantial Harm Criteria Checklist

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: WESTWOOD DPW
FACILITY ADDRESS: 235 HARRINGTON AVENUE
WESTWOOD, NJ 07675

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 (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) 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 (as calculated using the appropriate formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) 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 spill 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.

Richard Woods
Name (please type or print)

Signature

DPW Superintendent
Title

7/14/17
Date

APPENDIX E
Record of Annual Discharge Prevention Briefings and Training

RECORD OF ANNUAL DISCHARGE PREVENTION BRIEFINGS AND TRAINING

Topics to be Discussed

1. The location and general content of the SPCC.
2. Notification procedures in the event of a discharge.
3. The location of emergency response equipment at the facility.
4. Precautions to be taken when handling or transferring oil.
5. Actions to be taken to mitigate a discharge.
6. A discussion of any discharges which may have occurred at the facility in the past year.
7. Applicable pollution control laws, rules and regulations.

Year: _____

Name (Print)	Employee # or last 4 digits of SS#	Signature

APPENDIX F
Discharge Response Equipment Inventory

DISCHARGE RESPONSE EQUIPMENT INVENTORY

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

	Y	N	Description & Comments
REPAIR GARAGE			
Granular absorbent			50 lb. bags
Spill pads			2-3 cases
55-gallon drums			Empty drums
FUELING AREA			
SAND BY SALT SHED			

APPENDIX G
AST Inspection Records, Tests and Repairs