INTEGRITY ENVIRONMENTAL, LLC

SHIELD RECORD KEEPING SERVICE

GAP ANALYSIS

PREPARED FOR CITY OF SAINT PAUL

WWW.INTEGRITY-ENV.COM
INFO@INTEGRITY-ENV.COM
907-854-7347 (REGS)

INTEGRITY
ENVIRONMENTAL LLC

Thursday, February 6, 2025

February 6, 2025

City of Saint Paul
Bulk Fuel Facility
PO Box 901
Saint Paul Island, Alaska 99660

Re: 2025 Gap Analysis for the City of Saint Paul Bulk Fuel Facility Record Keeping

Dear Mr. Phil Zavadil,

An analysis was performed on the City of Saint Paul (CSP) Bulk Fuel Facility environmental plans and permits with regards to compliance with record keeping requirements. The following gaps were discovered during the review:

Plan Type	Record Keeping Item / Plan	Description
Oil Discharge Prevention and Contingency Plan and Facility Response Plan (ODPCP-FRP)	Contingency Plan Verification Log	The form will be incorporated into the next ODPCP-FRP amendment.
	ADEC Monthly Oil Spill Reporting Log	The form will be incorporated into the next ODPCP-FRP amendment.
	Fire Extinguisher Inspection Form	The form will be incorporated into the next ODPCP-FRP amendment.
	Oil Water Separator Monthly Inspection	This requirement will be incorporated into the Visual Inspection Monthly Report form. The form will be incorporated into the next ODPCP-FRP amendment.
Multi-Sector General Permit (MSGP), Storm Water Pollution Prevention Plan (SWPPP)	SWPPP or no exposure exclusion is not in place for the Facility	CSP personnel determined the Bulk Fuel Facility met the no exposure exclusion under the 2020 MSGP. Integrity will prepare the application for a no exposure certification for exclusion that CSP will be tasked with reviewing and submitting via online to the Alaska Department of Environmental Conservation.
Spill Prevention Control & Countermeasure (SPCC) Plan	Liquid Level Sensing Device Testing	This requirement will be incorporated into the Visual Inspection Monthly Report form. The form is used prior to bulk fuel transfers or on a monthly basis, whichever is less frequent. The form will be incorporated into the next SPCC amendment.
United States Coast Guard (USCG) Operations Manual	An approved USCG Operations Manual is not in place for the Facility	USCG Operations Manuals are required in accordance with 33 CFR 154 for bulk fuel facilities that transfer oil over water. The Operations Manual must be submitted to

Plan Type	Record Keeping Item / Plan	Description
		the USCG for review and approval every five years.

If during the gap analysis it was determined that additional plans and/or permits are required, Integrity will work with you towards achieving full compliance. We will immediately begin reviewing records from your existing plans and permits and additional records will be incorporated as your facility plans and permits develop.

Enclosed with this analysis, please find blank copies of all the required record keeping items. These blank forms are also available within the Client Portal.

A Welcome Letter including instructions on uploading files to the Client Portal, file structure, and a schedule for when they will be reviewed, will be provided soon. Please reach out with any questions.

Sincerely,

Haley Craig

Haley Craig
Environmental Consultant
907-759-5728
haley@integrity-env.com

Enclosures:

Gap Analysis Limitations
Shield Record Keeping List of Records
Blank copies of all record keeping items

INTEGRITY ENVIRONMENTAL LLC

Gap Analysis Limitations

The findings contained within this analysis convey to the client the opinion of Integrity Environmental about the general degree to which the audited environmental plans and permits comply with the specific regulations listed below. This opinion is based on a decade of experience in this field and is not to be used or represented as fact, certification, or a guarantee. City of Saint Paul is responsible for the compliance status of all environmental plans and permits.

Although comprehensive with regards to environmental record keeping, this audit is not all-inclusive, and is limited to plans, permits, and information provided by the client. This analysis did not include review CSP's Title V Operating Permit record keeping requirements.

Referenced Standards and Regulations

Alaska Department of Environmental Conservation. 18 Alaska Administrative Code, Chapter 70 Water Quality Standards. March 2020.

Alaska Department of Environmental Conservation. 18 Alaska Administrative Code, Chapter 75 Oil and Other Hazardous Substances Pollution Control. February 2023.

American Petroleum Institute (API) 653 Standard, fifth edition. Tank inspection, repair, alteration, and reconstruction. November 2014. Washington D.C.

American Petroleum Institute (API) 570 Standard, fourth edition. Piping Inspection Code: In-service Inspection, Rating, Repair, and Alteration of Piping Systems. February 2016. Washington D.C.

American Society for Mechanical Engineers (ASME) B31.3 Process Piping. January 2013. New York.

Code of Federal Regulations, Title 33, Part 154. United States Coast Guard Regulations for Facilities that Transfer Oil or Other Hazardous Materials. July 2010.

Code of Federal Regulations, Title 40, Part 112. U.S. Environmental Protection Agency Regulations on Oil Pollution Prevention. November 13, 2009.

International Code Council (ICC) International Fire Code (IFC). March 2009.

National Association of Corrosion Engineers Standard Practice 0169 (NACE SP-1069) Control of External Corrosion on Underground or Submerged Metallic Piping Systems. October 2013.

INTEGRITY
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Shield Record Keeping
List of Records

City of Saint Paul
Bulk Fuel Storage Facility

Frequency	Record Keeping Item
Weekly	☐ Secondary Containment Area Weekly Inspection Form (ODPCP-FRP)
Monthly	☐ Visual Inspection – Monthly Report (SPCC/ODPCP-FRP) ☐ Tank Farm Impound Area – Stormwater Drainage Log (SPCC) ☐ Monthly Physical Dip Conversions (ODPCP-FRP) ☐ Rectifier Log (ODPCP-FRP) ☐ Monthly Fire Extinguisher Inspection Form (ODPCP-FRP) ☐ Contingency Plan Verification Log (ODPCP-FRP) ☐ ADEC Monthly Oil Spill Reporting Log (ODPCP-FRP)
Quarterly	☐ NPREP Qualified Individual Notification Drill (ODPCP-FRP)
Semi-Annual	☐ Spill Response Equipment Inventory (ODPCP-FRP) ☐ NPREP Equipment Deployment (ODPCP-FRP)
Annual	☐ STI SP001 Annual Inspection Checklist (SPCC) ☐ Record of Annual Discharge Prevention Training (SPCC) ☐ Record of Reviews (SPCC) ☐ Fuel Pipeline Pressure Test (ODPCP-FRP) ☐ Fuel Hose Testing Record ☐ NPREP Response Tabletop (ODPCP-FRP) ☐ Employee Transfer Procedure Training Records (ODPCP-FRP) ☐ ODPCP Annual Review Record (ODPCP-FRP)
As-Needed	☐ Declaration of Inspection Prior to Bulk Cargo Transfer (ODPCP-FRP) ☐ EPA-Reportable Spill Record (SPCC)

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WEEKLY FORMS

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CITY OF ST. PAUL

BULK FUEL STORAGE FACILITY
TANK FARM
SECONDARY CONTAINMENT AREA

WEEKLY INSPECTION FORM

DATE:	INSPECTED BY:	ITEMS LISTED BELOW * VISUALLY CHECKED:	COMMENTS IF NECESSARY

* ADEC regulations (18 AAC 75.075(c)) require facility personnel to conduct a documented weekly inspection of secondary containment areas for aboveground storage tanks, including checking for

(1) debris and vegetation;
(2) proper alignment and operations of drain valves;
(3) visible signs of oil leaks or spills;
(4) defects or failures of the secondary containment system.

This form is to be maintained in retrievable form for five years. (18 AAC 75.020(c))

INTEGRITY ENVIRONMENTAL, LLC

MONTHLY FORMS

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907-854-7347 (REGS)

CITY OF SAINT PAUL – BULK FUEL STORAGE FACILITY
VISUAL INSPECTION – MONTHLY REPORT

DATE: _____

INSPECTED BY: _____

	INSPECTED / OK (✓)	REQUIRES ATTENTION (attach comments)
TANK FARM		
EACH TANK INSPECTED FOR:		
1. Visible signs of leakage, damage		
2. Signs of distortions, denting, bulging		
3. No severe corrosion – paint in good condition		
4. Foundations sound, no evidence of cracking, settlement or washout		
5. Tank valves – locked / good condition		
6. Tank level gauges – readable / good condition		
7. Tank vents – free of obstructions / operate properly		
8. All tank openings, manways properly sealed – bolts tight		
9. Tank roofs in good condition – no standing water, holes		
10. Leak detection gauges – pipes checked – no sign of leakage		
11. High level alarms tested – operate properly		
SECONDARY CONTAINMENT AREA – DIKED IMPOUND		
12. Diked areas impervious – retain stormwater – no oil sheen on water		
13. Retained water level acceptable (low)		
14. Containment area free of debris, fire hazards		
15. Dike, berm, liner in good condition – no cracks, erosion		
O/W SEPARATOR		
16. Oil/sheen free and in good condition		
EXPOSED PIPING		
17. Free of leakage, damage – good condition		
18. Supports, bollards – good condition		
19. Flex connectors – good condition		
20. Valves – good condition / locked		
TRUCK RACK & DISPENSING STATION		
21. TTLR free of debris, vegetation, water, other items		
22. TTLR – warning signs present		
23. Free of leakage, damage – good condition		
24. Piping, valves, pumps, meters – good condition		
25. Hoses, nozzles, downspouts – good condition		
SECURITY		
26. Fences, gates – good condition – clear pathways / egress		
27. Locks on gates / tanks		
28. Warning signs in place		
29. Security lights operable		
30. Emergency notification signs posted		
31. Fire extinguishers in place		

*In the event of severe weather (snow, ice, windstorms) or maintenance (such as paintings) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event. This checklist (or similar documentation) to be retained for 36 months to comply with API tank inspection standards and five years to comply with ADEC regulations.

CITY OF SAINT PAUL – BULK FUEL STORAGE FACILITY
VISUAL INSPECTION – MONTHLY REPORT

	INSPECTED / OK	REQUIRES ATTENTION (attach comments)
OFFICE/STORAGE VANS		
32. General condition (housekeeping)		
33. Electrical wiring, control boxes, grounding lines – good condition		
34. Spill response equipment – inventory complete / equipment operable		
35. FRP / ODPCP, Ops. Manual, SPCC Plan in Place		
POWER PLANT/DAY TANKS		
32. Tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) is free of visible leaks		
33. Area around the tank (concrete surfaces, ground, containment, etc.) is free of visible signs of leakage		
34. Spill container (spill bucket) is empty, free of visible leaks and in good working condition		
35. Piping connections to the tank (valves, fittings, pumps, etc.) are free of visible leaks		
36. Containment is free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues		
37. Dike drain valves are closed and in good working condition		
38. Containment access pathways are clear and any gates/doors operable		
39. System is free of any other conditions that need to be addressed for continued safe operations		
CONTINGENCY TANKS		
32. No damage to the emergency storage tanks		
DRUMS AND OTHER PORTABLE CONTAINERS		
33. Portable container(s) are within designated storage area		
34. Containment and storage area is free of excess liquid, debris, cracks or fire hazards		
35. Drain valves are closed and in good working condition		
36. Containment access pathways are clear and any gates/doors operable		
37. Containers are free of leaks		
38. Containers free of distortions, buckling, denting or bulging		

ADDITIONAL COMMENTS
OTHER CONDITIONS THAT SHOULD BE ADDRESSED FOR CONTINUED SAFE OPERATIONS

CITY OF ST. PAUL - BULK FUEL STORAGE FACILITY

TANK FARM IMPOUND AREA - STORMWATER DRAIN LOG

Date & of Draining	Time Draining Started	Time Draining Finished	Any Sheen Y / N	Operator's Signature

***** Operator's signature confirms that no oil or sheen was discharged during draining.

This form (or similar documentation) is required by 40 CFR, Part 112.8(c)(3).

CITY OF SAINT PAUL
MONTHLY PHYSICAL DIP CONVERSIONS

	TANK #1 80,000 GAL. CAPACITY GASOLINE	TANK #2 80,000 GAL. CAPACITY DIESEL BLEND	TANK #3 80,000 GAL. CAPACITY DIESEL BLEND	TANK #4 120,000 GAL CAPACITY DIESEL BLEND	TANK #5 80,000 GAL. CAPACITY DIESEL BLEND
DIP MEASURED					
GALLONS					
TEMPERATURE					
API					
CONV.FACTOR					
TOT.GALLONS					

	TANK #6 80,000 GAL. CAPACITY DIESEL BLEND	TANK #7 80,000 GAL. CAPACITY DIESEL BLEND	TANK #8 600,000 GAL. CAPACITY DIESEL BLEND	TANK #9 600,000 GAL. CAPACITY DIESEL BLEND	DAY TANKS 20,000 GAL. CAPACITY DIESEL BLEND
DIP MEASURED					EMPTY
GALLONS					NO LONGER USED
TEMPERATURE					USED
API					UNTIL
CONV.FACTOR					FURTHER
TOT.GALLONS					NOTICE

	TANK #10 3,600 GAL. CAPACITY DISPENSING STATION DIESEL BLEND	TANK #11 3,600 GAL. CAPACITY DISPENSING STATION GASOLINE	TANKER TRUCK # 551 4,000 GALLON	TANKER TRUCK # 492 500 GALLON	TOTAL GALLONS GASOLINE
DIP MEASURED					
GALLONS					TOTAL
TEMPERATURE					GALLONS
API					DIESEL
CONV.FACTOR					
TOT.GALLONS					

MONTH/DATE/YEAR _____
PHYSICAL DIPS DONE BY: _____
Start_____ _____
Stop_____ _____

Rectifier Log

Owner: City of St. Paul, Ak Tank Farm Cathodic Protection System
Structure: On-grade Storage Tank bottoms and piping
Recommended Current Output: 20 Amps

Date	Volts	Amps	Taps	Comments

Monthly Fire Extinguisher Inspection List

This form to be completed monthly, and retained for 12 months in accordance with NFPA10 Standard for Portable Fire Extinguishers.

No:	Brand	Location	Model	Type	Size		Inspected
1							
2							
3							
4							
5							
6							
7							
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43							
44							

I certify that the fire extinguishers listed above were inspected and determined to be in good condition. Any maintenance needs are noted above.

Inspector **Date**

State of Alaska Department of Environmental Conservation

Contingency Plan Verification Log

This log is to be completed by terminal facility owners/operators who are subject to the requirements of AS 46.04.030 and 18 AAC 75, Article 4, and who transfer petroleum to or from tank vessels, oil barges, non tank vessels over 400 GRT or rail cars carrying petroleum products as cargo in Alaskan waters. Completion of this form is required by 18 AAC 75.465. Per regulation this form must be submitted to the department during the first five days of the current month for the previous month's deliveries.

Please Type or Print Clearly Month/Year _____

Terminal Name: _____

Terminal Owner: _____ **Telephone:** _____

Terminal Address: _____

Date	**Name of Vessel** (Please Print)	**Vessel Contingency Plan Holder** (Company Name) (Please Print)	**Vessel Operator Signature** [1]	**Terminal Owner or Operator Signature** [2]

[1] **VESSEL OPERATOR**, by signature, hereby certifies that a current copy of the response action plan section of the current approved oil discharge prevention and contingency plan for that vessel or barge is onboard the vessel or barge.

[2] **TERMINAL OWNER OR OPERATOR**, by signature, hereby certifies that the vessel operator has produced for his or her inspection an original or true photocopy of the certificate of approval for the oil discharge prevention and contingency plan which covers the operations of that vessel or barge. {An approval letter authorizing specific dates of operation is also required for a chartered vessel, which is temporarily covered under a contingency plan.}

18 AAC 75.465. Proof of approved plan

(a) The owner or operator of an oil terminal facility may not cause or permit the transfer of oil to or from a vessel, barge, or railroad tank car unless

(1) the operator of the vessel, barge, or railroad tank car has produced for inspection by the facility owner or operator the original certificate or a true photocopy of the original, approving the oil discharge prevention and contingency plan or nontank vessel plan for that operation; and

(2) the operator of the vessel, barge, or railroad tank car has certified, on a certification log form supplied by the department and maintained by the owner or operator of the oil terminal facility, that a copy of the response action plan section of the current approved oil discharge prevention and contingency plan, or the original certificate or a true photocopy of the original nontank vessel plan approval certificate, for that vessel or barge is on board the vessel or barge.

(b) The owner or operator of an oil terminal facility shall certify on the certification log form that the operator of the vessel or barge has complied with (a)(1) and (2) of this section. The facility owner or operator shall maintain the log on a monthly basis and shall submit the log for the previous month to the department within the first five days of the following month. Service is effective upon personal delivery or transmittal by facsimile or on the date of mailing by certified mail to the department. The department will retain copies of all log forms received under this subsection for three years after receipt.

(c) On the first working day after the operator of a vessel or railroad tank car fails to comply with the requirements of (a)(1) or (2) of this section, the oil terminal facility owner or operator shall report that failure to the department by telephone or facsimile.

(d) Verification and entry on the certification log form referred to under (b) of this section is required for each separate loading or unloading operation of a vessel at an oil terminal facility.

Form maybe mailed,e-mailed, or fax to the Department.

Mailing address: ADEC/PPR
555 Cordova St
Anchorage, AK 99501

fax number: (907) 269-7687

Email: DECSPARC-PLAN@alaska.gov

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION

MONTHLY OIL SPILL REPORTING LOG

Only for hydrocarbon spills less than 10 gallons, solely to land, not to creeks, sewers or storm drains.
(see Discharge Reporting requirements, 18 AAC 75.300)

SPILLS GREATER THAN 55 GALLONS SOLELY TO LAND OUTSIDE SECONDARY CONTAINMENT, HAZARDOUS SUBSTANCE SPILLS OR SPILLS TO WATER MUST BE REPORTED IMMEDIATELY.

Call ADEC for more information: **1-800-478-9300**
Please submit the completed monthly spill reporting log to the nearest ADEC office:

Anchorage/Central Alaska Region: dec.carspillreport@alaska.gov
Anchorage/Western Alaska Region: dec.sparwregion@alaska.gov
Fairbanks/Northern Alaska Region: decsparnregion@alaska.gov
Juneau/Southeast Alaska Region: dec.spar.seregion.spills@alaska.gov

FACILITY NAME AND ADDRESS:	
REPORT MONTH/YEAR:	
REPORTED BY:	**PHONE #:**
EMAIL:	

DATE / TIME OF SPILL	LOCATION	PRODUCT SPILLED	QTY SPILLED (GALLONS)	CAUSE OF SPILL & AREA AFFECTED	WHO RESPONDED	CLEANUP & METHOD / PLACE OF DISPOSAL

INTEGRITY ENVIRONMENTAL, LLC

QUARTERLY FORMS

WWW.INTEGRITY-ENV.COM
INFO@INTEGRITY-ENV.COM
907-854-7347 (REGS)

ANNUAL NPREP TRAINING & DRILLS DOCUMENTATION

This form must be retained for five years.

1. QUALIFIED INDIVIDUAL NOTIFICATION DRILL (QUARTERLY)

Contact made with Q.I. or Alternate Q.I.

Date	**Time**	**Person Initiating Call**	**QI Contacted**

2. MANAGEMENT TEAM TABLETOP EXERCISE (ANNUAL)

Brief Description of Spill Response Exercise:

Date	Time	Participants

3. EQUIPMENT DEPLOYMENT EXERCISE (SEMI-ANNUAL)

Date:
Equipment/Personnel Deployed:

_____
_____
_____
_____
_____
_____
_____
_____

Date:
Equipment/Personnel Deployed:

_____
_____
_____
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_____
_____
_____

4. UNANNOUNCED EXERCISE (ANNUAL)

Was one of the above exercises unannounced?

_____ Yes, date unannounced exercise performed: _____

_____ No, describe your unannounced drill and date performed here:

INTEGRITY ENVIRONMENTAL, LLC

SEMI-ANNUAL FORMS

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City of Saint Paul Spill Response Equipment Inventory

This form is to be completed semi-annually and retained for 5 years.

Quantity	Description	Location	Initials
Containment			
1,050 ft.	Orange ocean boom (36” x 20”)	Fuel Dock Vans	
1,250 ft.	Yellow harbor boom (17” x 10”)	Fuel Dock Vans	
990 ft.	Yellow harbor boom (20” x 10”)	Fuel Dock Vans	
10 each	Anchor / Buoy Systems	Fuel Dock Vans	
Recovery			
4 bales	Sorbent Pads (18"x18")	Fuel Dock Vans	
3 rolls	Sorbent Rolls (36"x150')	Fuel Dock Vans and Tank Farm Building	
400 ft	Sorbent Boom (8"x10')	Fuel Dock Vans	
80 ft	Sorbent Boom (8"x10')	Tank Farm Building	
5	Sweeps (18"x100')	Tank Farm Building	
1	Sorbent Wringer	Tank Farm Building	
1	Skim-Pak 183000-SH (EDRC 2,880 bpd)	Fuel Dock Vans	
2 each	3” Honda trash pump (290 gpm)	Machine Shop at Tank Farm	
500 ft	1½", 2" & 3" Service w Fittings/Reducers	Fuel Dock & Public Works	
Temporary storage			
20	55-Gal. Salvage Drums	Fuel Dock & Tank Farm	
1	Bladder Tank - 250 gal	Fuel Dock	
6	Tanks-not in Service (Total Volume 40,000 Gal)	Tank Farm	
Vessels			
1	18 ft. skiff with 90 HP engine	Fire Station	
Utility vehicles			
1 each	International - 6,000 Gal.	Motor Pool	
4	Pickup Trucks	Public Works	
2	Drop Box Flatbed Trucks	Public Works	
1	Tractor and lowboy trailer	Equipment Bay	
1	Dozers	Equipment Bay	
1	12 yd. Dump Truck	Equipment Bay	
3	Front End Loaders	Equipment Bay	
1	Backhoe	Equipment Bay	

Quantity	Description	Location	Initials
1	Backhoe	Equipment Bay	
2	Road Grader	Equipment Bay	
2	Skid Steer Loader	Equipment Bay	
Miscellaneous			
8 each	VHF Radios - Portable & Base Stat.	Office & Various	
1	LEL/0_2 meter	Harbor Office	
Assorted	Pipeline, Tank Patch Materials	Tank Farm	
5 Sets	Rakes/Shovels	Dock, Tank Farm, Public Works	
Assorted	Damming Materials	Public Works	
10 Sets	Protective Clothing & PFD's	Dock, Tank Farm, Public Works	
10 each	Fire Extinguishers	Dock, Tank Farm, Public Works	
3 Cases 100 Bags each	Oily Waste Storage/Disposal Bags – 33'x46" – 4 mil	Public Works	

Comments: _____

_____

_____

_____

I certify that the above equipment was inspected for condition and operability. Any maintenance or replacement requirements are noted above.

_____ _____

Inspector Date

ANNUAL NPREP TRAINING & DRILLS DOCUMENTATION

This form must be retained for five years.

1. QUALIFIED INDIVIDUAL NOTIFICATION DRILL (QUARTERLY)

Contact made with Q.I. or Alternate Q.I.

Date	**Time**	**Person Initiating Call**	**QI Contacted**

2. MANAGEMENT TEAM TABLETOP EXERCISE (ANNUAL)

Brief Description of Spill Response Exercise:

Date	Time	Participants

3. EQUIPMENT DEPLOYMENT EXERCISE (SEMI-ANNUAL)

Date:
Equipment/Personnel Deployed:

_____
_____
_____
_____
_____
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_____
_____

Date:
Equipment/Personnel Deployed:

_____
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_____

4. UNANNOUNCED EXERCISE (ANNUAL)

Was one of the above exercises unannounced?

_____ Yes, date unannounced exercise performed: _____

_____ No, describe your unannounced drill and date performed here:

INTEGRITY ENVIRONMENTAL, LLC

ANNUAL FORMS

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STI SP001 Annual Inspection Checklist

General Inspection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____

Inspector Name (print):_____ Title: _____

Inspector's Signature: _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) _____

Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

	ITEM	STATUS	COMMENTS / DATE CORRECTED
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	☐Yes ☐No	
2	Concrete pad or ring wall free of cracking and spalling?	☐Yes ☐No ☐N/A	

3	Tank supports in satisfactory condition?	☐Yes ☐No ☐N/A	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	☐Yes ☐No ☐N/A	
5	Is the grounding strap between the tank and foundation/supports in good condition?	☐Yes ☐No ☐N/A	
Tank Shell, Heads and Roof			
6	Free of visible signs of coating failure?	☐Yes ☐No	
7	Free of noticeable distortions, buckling, denting, or bulging?	☐Yes ☐No	
8	Free of standing water on roof?	☐Yes ☐No ☐N/A	
9	Are all labels and tags intact and legible?	☐Yes ☐No	
Tank Manways, Piping, and Equipment			
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	☐Yes ☐No ☐N/A	
Tank Equipment			
11	Normal and emergency vents free of obstructions?	☐Yes ☐No	
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	☐Yes ☐No ☐N/A	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	☐Yes ☐No ☐N/A	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	☐Yes ☐No ☐N/A	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?"	☐Yes ☐No ☐N/A	

16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): □ Anti-siphon valve □ Check valve □ Gate valve □ Pressure regulator valve □ Expansion relief valve □ Solenoid valve □ Fire valve □ Shear valve	☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A ☐Yes ☐No ☐N/A	
17	Are strainers and filters clean and in good condition?	☐Yes ☐No ☐N/A	
Insulated Tanks			
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	☐Yes ☐No ☐N/A	
19	Insulation free of noticeable areas of moisture?	☐Yes ☐No ☐N/A	
20	Insulation free of mold?	☐Yes ☐No ☐N/A	
21	Free of visible signs of coating failure?	☐Yes ☐No ☐N/A	
Tank / Piping Release Detection			
22	Is inventory control being performed and documented if required?	☐Yes ☐No ☐N/A	
23	Is release detection being performed and documented if required?	☐Yes ☐No ☐N/A	
Other Equipment			
24	Are electrical wiring and boxes in good condition?	☐Yes ☐No ☐N/A	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	☐Yes ☐No ☐N/A	

Additional Comments:

Record of Annual Discharge Prevention Training Log

Briefings will be scheduled and conducted by the facility owner or operator for all oil-handling personnel at the facility. This training is to be completed once annually.

Save a copy of each training agenda and attendance log behind this tab in the SPCC binder or use the table below to document all training sessions. Training topics are provided in Section 3.5 of this SPCC Plan.

DATE	INSTRUCTOR(S)	TOPICS COVERED	NAME OF PERSONNEL TRAINED

RECORD OF REVIEWS

40 CFR 112.5(b)

Statement	Signature
‘‘I have completed review and evaluation of the SPCC plan for the facility on _____ (Date) and will/will not (Circle one) amend the plan as a result.’’	
Description of Revisions	
Statement	
‘‘I have completed review and evaluation of the SPCC plan for the facility on _____ (Date) and will/will not (Circle one) amend the plan as a result.’’	
Description of Revisions	
Statement	
‘‘I have completed review and evaluation of the SPCC plan for the facility on _____ (Date) and will/will not (Circle one) amend the plan as a result.’’	
Description of Revisions	
Statement	
‘‘I have completed review and evaluation of the SPCC plan for the facility on _____ (Date) and will/will not (Circle one) amend the plan as a result.’’	
Description of Revisions	

CITY OF ST. PAUL FUEL PIPELINE HYDROSTATIC PRESSURE TEST

DATE: _____
TEST LOCATION: _____
PIPE SELECTION: **FROM VALVE 50 TO VALVE 52**
TEST PRESSURE **PSI**
GUAGE #1 S.N. _____
GUAGE #2 S.N. _____

ENTRY	TIME	ACTION	PRESSURE GUAGE #1	PRESSURE GUAGE #2	FUEL TEMP	AIR TEMP	COMMENTS
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

TEST PERSON (Print Name)

WITNESS (Print Name)

SIGNATURE

SIGNATURE

FUEL HOSE TESTING RECORD
50' X 3"

Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:

STATIC LIQUID PRESSURE TEST

MARINE TRANSFER HOSES

FUEL HOSE TESTING RECORD
100' X 2"

Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:
Hose #:	Hose #:	Hose #:
Date Tested:	Date Tested:	Date Tested:
Tested At:	Tested At:	Tested At:
Tested By:	Tested By:	Tested By:

STATIC LIQUID PRESSURE TEST

MARINE TRANSFER HOSES

ANNUAL NPREP TRAINING & DRILLS DOCUMENTATION

This form must be retained for five years.

1. QUALIFIED INDIVIDUAL NOTIFICATION DRILL (QUARTERLY)

Contact made with Q.I. or Alternate Q.I.

Date	**Time**	**Person Initiating Call**	**QI Contacted**

2. MANAGEMENT TEAM TABLETOP EXERCISE (ANNUAL)

Brief Description of Spill Response Exercise:

Date	Time	Participants

3. EQUIPMENT DEPLOYMENT EXERCISE (SEMI-ANNUAL)

Date:
Equipment/Personnel Deployed:

_____
_____
_____
_____
_____
_____
_____
_____

Date:
Equipment/Personnel Deployed:

_____
_____
_____
_____
_____
_____
_____
_____

4. UNANNOUNCED EXERCISE (ANNUAL)

Was one of the above exercises unannounced?

_____ Yes, date unannounced exercise performed: _____

_____ No, describe your unannounced drill and date performed here:

City of Saint Paul Employee Transfer Procedure Training Record

Employee Name: _____

Hire Date: _____

City of Saint Paul employees involved in fuel transfers at the bulk fuel facility are required to receive training on transfer procedures at the time of hire. Transfer procedures will be reviewed on an as-needed basis after the initial hire training. Use the table below to document each training session. Retain a copy of this document for five years in accordance with 18 AAC 75.451(j)(3).

Date Completed	Employee Signature	Supervisor Signature
Initial Hire Training		
As-Needed Training		

ODPCP Annual Review Record

Once each year, pertinent sections (Sections 1 and 3) of the City of Saint Paul ODPCP will be reviewed with employees that participate in spill response at the facility. The table below is used to document the completion of the annual review of the ODPCP.

Date	Review Complete By	Supervisor Signature

INTEGRITY ENVIRONMENTAL, LLC

AS-NEEDED FORMS

WWW.INTEGRITY-ENV.COM
INFO@INTEGRITY-ENV.COM
907-854-7347 (REGS)

Declaration of Inspection Prior to Bulk Cargo Transfer

Date _____ Time _____

Receiving Unit (Name and Address)

Delivering Unit (Name and Address)

The following list refers to requirements set forth in detail in 33 CFR 156.120, 156.150, and 46 CFR 35.35-30. The spaces adjacent to items on the list are provided to indicate that the detailed requirement has been met. Retain on file for one month from date of completion.

		DELIVERER	RECEIVER
1.	Safe smoking spaces. (35.35—30)		
2.	Repair work authorization. (35.35—30)		
3.	Boiler and galley fires safety. (35.35—30)		
4.	Fires or open flames. (35.35—30)		
5.	Warning signs and red warning signals. (35.35—30)		
6.	Vessels moorings. 156.120 (a)		
7.	Hoses and loading arms, length and support. 156.120 (b)(c)		
8.	Transfer system alignment. 156.120 (d)		
9.	Transfer system; used components. 156.120 (e)		
10.	Unused hoses and loading arms blanked. 156.120 (f)		
11.	Transfer system; fixed piping. 156.120 (g)		
12.	Overboard discharges/sea suction valves. 156.120 (h)		
13.	Transfer hose condition. 156.120 (i)		
14.	Hose and loading arm; test markings. 156.120 (j)		
15.	Connections; gaskets, bolts. 156.120 (k)		
16.	Monitoring devices (where required). 156.120 (l)		
17.	Discharge containment system. 156.120 (m)(n)		
18.	Scuppers and drains. 156.120 (o)		
19.	Connections and glands tight. 156.120 (p)		
20.	Communications; established and operable. 156.120 (q)		
21.	Emergency shutdown. 156.120 (r)		
22.	Person-in-charge. 156.120 (s)(t)		
23.	Sufficient personnel. 156.120 (u)		
24.	Language to be used _____ .156.120 (v)		
	Interpreter (if any) _____		
25.	Lighting (sunset to sunrise). 156.120 (y)(z)		
26.	Agreement to begin transfer. 156.120 (x)		
27.	Transfer conference. 156.120 (w)		

Sequence	Product Name	Quantity (Gal.)	Rate of Pressure (PSI)

Person-in-Charge of Receiving Unit	Title	Time and Date

Person-in-Charge of Delivering Unit	Title	Time and Date

EPA-Reportable Spill Record*

Date of Spill	Spill Location	Type of Oil Spilled	Quantity Spilled	Action Taken	Notifications Made

*EPA-reportable spills include those discharges of oil that:

(a) Violate applicable water quality standards; or

(b) Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.