



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Prevention, Preparedness, and Response Program

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Facility #: 2028

January 13, 2023

Phillip Zavadil
City of Saint Paul
PO Box 901
Saint Paul, AK 99660

Subject: **City of Saint Paul Bulk Fuel Storage Facility Oil Discharge Prevention and Contingency Plan, ADEC Plan #: 20-CP-2018; Inspection Results**

Dear Mr. Zavadil:

Alaska Department of Environmental Conservation (department) staff Lucas Ellis and Howard Minor conducted an inspection of the City of Saint Paul Bulk Fuel Storage (facility) in Saint Paul, AK on October 11, 2022. The purpose of this inspection was to verify compliance with the oil and hazardous substances pollution control statutes and regulations and the approved City of Saint Paul Bulk Fuel Storage Facility Oil Discharge Prevention and Contingency Plan (plan) in accordance with 18 AAC 75.480.

Inspection began at the City of Saint Paul Public Works with a review of inspection logs, training records, exercise records, and updated copy of the plan. Following the document portion of the inspection, department staff conducted a walk-through of the tank truck loading area, the tank farm, pump house, transfer piping, and the fuel dock. Department staff examined the spill response equipment stored in fuel dock vans. Facility operations were discussed at length with City of Saint Paul Bulk Fuel Storage Facility manager and bulk fuel operators.

The inspection revealed the following issues that require corrective action:

1. **18 AAC 75.065(k):** requires the owner or operator of a field-constructed aboveground oil storage tank to ensure a means of overfill prevention.

During the inspection City of Saint Paul representatives stated that the Senix ToughSonic CHEM 20 overfill prevention system was turned off because it was not operating properly. Facility personnel mentioned that the audible high-level alarm was going off despite tanks being within normal operating levels.

Action: The overfill prevention system must provide adequate warning of high tank levels as outlined in section 2.5.3 of the plan. Make necessary repairs to the system so that the Senix ToughSonic CHEM 20 system operates reliably to prevent spills. The department highly recommends contacting the Senix Corporation for troubleshooting assistance.

2. **18 AAC 75.075(c):** states the secondary containment system must be maintained free of debris, vegetation, excessive accumulated water, or other materials or conditions that might interfere with the effectiveness of the system.

During the field inspection, I saw what appeared to be an unsealed electrical conduit penetration in the marine header secondary containment. Secondary containment area (SCA) breaches and damage could result in spilled oil escaping the SCA. This is a repeat area of concern from the department's September 2016 inspection. (See photo example #1)

Action: City of Saint Paul employees initiated repairs to the SCA while department staff was still on the island. Complete repairs and send photographic evidence of the completed repairs to the department.

3. **18 AAC 75.080(a)(b)(l)(m):** requires the owner or operator to maintain metallic facility oil piping containing oil in accordance with a corrosion control program.

During the inspection it was noted that soil interface wrappings appeared to be in poor condition or missing on the 4-, 6-, and 8-inch pipelines located throughout the facility. Please be reminded that the American Petroleum Institute (API) 570 section 3.42 defines a soil-to-air interface as "an area in which external corrosion may occur on partially buried pipe. The zone of the corrosion will vary depending on factors such as moisture, oxygen content of the soil, and operating temperature. The zone generally is considered to be from 12 inches (305 mm) below to 6 inches (150 mm) above the soil surface. Pipe running parallel to the surface that contacts the soil is included as well." This is a repeat area of concern from the department's September 2016 inspection. (See photo example #2).

Action: The department requires a written corrosion control plan and timeline to repair the piping soil-to-air interfaces defects identified during the inspection. Establishing and adhering to an aggressive corrosion control maintenance program is crucial for protecting the facility against possible corrosion-related pipeline hazards. The department highly encourages the City of Saint Paul to consult with your Engineering Firm and your Cathodic Protection Testing Company for guidance on resolving the piping soil-to-air interface wrapping applications and any other cathodic protection concerns.

4. **18 AAC 75.425(e)(3)(vii) & 445(d)(4):** Requires oil discharge response equipment and other resources under the immediate control of the operator when not in use, to be periodically inspected, tested, and maintained. Section 3.6.4 of the plan outlines the Bulk Fuel Manager's responsibility for conducting a documented equipment inventory every six months.

During the facility records review portion of the inspection, the Bulk Fuel Manager could not provide evidence of response equipment inspection activities as stated in section 3.6.4 of the plan. This is a repeat area of concern from both the department's August 2013 and September 2016 inspections.

Action: Accomplish a "documented" semi-annual response equipment inventory and inspection program to ensure facility staff follow the plan. Unless specified otherwise, records must be kept for at least five years and copies of the response equipment checks shall be provided to the department upon request.

5. **18 AAC 75.020(e)**: requires the owner or operator to prepare and maintain records in retrievable form to document training, inspections, tests, maintenance, and repairs required by 18 AAC 75.005 -18 AAC 75.085. Section 3.1.4.1 of the plan states that training of facility personnel in transfer procedures will be conducted on date of hire, and on a quarterly basis. Likewise, both sections 2.1 and 3.9 indicate that facility operators must complete an annual review of pertinent portions of the ODPCP.

During the inspection the Facility Manager could not provide either records of quarterly transfer procedures training or records of annual ODPCP review. This is a repeat area of concern from both the department's August 2013 and September 2016 inspections.

Action: The City of Saint Paul must implement an improved method/system for tracking and recording all required employee training. These training records must be maintained for a minimum of 5 years and be available for inspection upon request by the department.

Based on the inspection, the department requests the following information:

1. Tanks number 2, 6, 7, 8, & 9 are due an In-Service API 653 inspection during 2022. Please provide the department a copy of the inspection reports upon receipt from your third-party inspection agency.
2. Please provide a copy of the next completed City of St. Paul Spill Response Equipment Inventory form.
3. Please send a copy of the report from the most recently completed Cathodic Protection survey.

Plan Updates:

18 AAC 75.415(b): states that a routine plan update must be submitted in accordance with 18 AAC 75.408 not later than five days after the date the proposed change occurs. Please submit a routine update to the plan to address change in personnel for the City of Saint Paul city clerk. The previous city clerk is still listed as the Public Information Officer and the Alternate Qualified Individual.

Observations and Recommendations:

1. During the inspection I observed what appeared to be a leaking joint on the tank truck loading arm piping. A City of Saint Paul employee stated that a grease wrapping served as a temporary fix and is used to keep the joint from actively leaking. Recommend making repairs if possible and otherwise maintaining keen awareness of this issue. If City employees recognize active leaking from the joint in the future, a replacement of the arm should be considered to prevent a potentially significant fuel spill. (See photo example #3).
2. During the inspection City employees noted that the emergency stop for the tank truck loading arm does not work. It is recommended that the City of Saint Paul make repairs so that all engineering safeguards put into place for this system function as designed. (See photo example #4).

3. During the inspection it was noted that some City of Saint Paul spill response resources (absorbent pads, boom, etc.) had been used during the response to the St. Paul Fuel transfer pipe spill earlier in the summer. City employees noted that getting resupply on the island has been more difficult than usual due to supply chain constraints. Please ensure that the previously noted spill response equipment inventory is completed promptly and that resupply of missing materials occurs as soon as possible.

City of Saint Paul] must submit a written response to the items that require corrective action and the information requests by February 24, 2023. The written response must include specific remedies for each issue identified, along with a schedule for implementation of these remedies. Failure to address these issues by the dates agreed upon with the department may result in formal enforcement action.

The department would like to thank David Joyner, Marc Galanin, Steven Melovidiv, Sr. and the rest of the City of Saint Paul staff for their assistance during the inspection. If you have any questions, please contact me at 907-269-0910 or Lucas.Ellis@alaska.gov.

Sincerely,

DocuSigned by:

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Lucas Ellis
Environmental Program Specialist

Enclosures: Photo Sheet

cc with enclosure:

Bernie Nowicki, ADEC
Mark Sielaff, ADEC
John Ebel, ADEC
Howard Minor, ADEC
David Joyner, City of Saint Paul



Photo #1

Photo File Name: PA110516(cropped).jpeg

Date of Photo: 10/11/22

Photographer: Howard Minor

Description: Containment breach beneath marine header where wiring comes through (Open deficiency from 2016 inspection. Facility representative initiated repairs the same day. Awaiting photographic evidence of completion of repairs)



Photo #2
Photo File Name: PA110370.jpeg
Date of Photo: 10/11/22
Photographer: Howard Minor
Description: Soil-to-air defects identified on facility piping
(Open deficiency from 2016 inspection)



Photo #3

Photo File Name: PA110108.jpeg

Date of Photo: 10/11/22

Photographer: Lucas Ellis

Description: Leaking joint on the tank truck loading arm. City of Saint Paul employees stated that a “grease wrap” serves as a temporary fix to prevent fuel from leaking.



Photo #4

Photo File Name: PA110106.JPG

Date of Photo: 10/11/22

Photographer: Lucas Ellis

Description: During the inspection a City employee stated that the emergency stop for the tank truck loading area did not work.