Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.^a No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Section I, II, and III: Required for all Tier I qualified facilities

Section A: Onshore facilities (excluding production)

Section B: Onshore oil production facilities (excluding drilling and workover facilities)

Section C: Onshore oil drilling and workover facilities

Attachments: 1 - Five Year Review and Technical Amendment Logs
2 - Oil Spill Contingency Plan and Checklist
3 - Inspections, Dike Drainage and Personnel Training Logs
4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

^a Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name	Gales Ferry Intermodal, Ste	rling Facility			
Facility Address	1761 Connecticut Route 12				
City	Gales Ferry	State	СТ	ZIP	06335
County	New London	Tel. Number	(781) 789 - 9397		
Owner or Operator Name	Jay Cashman, Inc.				
Owner or Operator Address	549 South Street				
City	Quincy	State	MA	ZIP	02169
County	Norfolk	Tel. Number	(617) 890 - 0600		

I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

- I Chase Davis certify that the following is accurate:
 - 1. I am familiar with the applicable requirements of 40 CFR part 112;
 - 2. I have visited and examined the facility;
 - 3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
 - 4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
 - 5. I will fully implement the Plan;
 - 6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
 - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
 - 7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
 - 8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

- 1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
- 2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
- 3. Optional use of a contingency plan. A contingency plan:
 - a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
 - b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
 - c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature	gnature		Operations Specialist
Name	Chase Davis	Date:	07 / 10 / 2023

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	\boxtimes
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. [§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	\boxtimes

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Sto	orage Containers and Capacities		
This table includes a complete list of all oil storage (tanks ^b) with capacity of 55 U.S. gallons or more, un containers, an estimated number of containers, type	less otherwise exempt from the rule. F	or mobile/portable	
Oil Storage Container (indicate whether aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (g	jallons)
Waste Oil Storage Tank (A)	Used Oil	500	
Diesel Storage Tank (A)	Diesel	1000	
Caterpillar 980 Loader Fuel Tank (A)	Diesel	113	
Caterpillar 385 Excavator Fuel Tank (A)	Diesel	328	
Caterpillar 385 Excavator Hydraulic System (A)	Hydraulic Fluid	263	
Liebherr 1250 Crawler Crane Fuel Tank (A)	Diesel	209	
Liebherr 1250 Crawler Crane Hydraulic System (A)	Hydraulic Fluid	172	
	al Aboveground Storage Capacity °		allons
Total Co	ompletely Buried Storage Capacity Facility Total Oil Storage Capacity		allons allons
	racinty rotal on Storage Capacity	ya	61 IUIIX

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

containers, equipment, and transfer areas to prevent a discharge to havigable waters of adjoining shorelines.	Table G-3 Secondary Containment and Oil Spill Control	
constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape	

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

^a Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

^b Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

^c Counts toward qualified facility applicability threshold.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge;

and the secondary containment method and containment capacity that is provided.

	Potential	Direction of	1	
Type of failure (discharge scenario)	discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method ^a	Secondary containment capacity (gallons)
ble Containers ^b				
Tank failure (rupture or leak)	500	Within secondary containment	Double-walled tank	550 ^d
Tank failure (rupture or leak)	1000	Within secondary containment	Double-walled tank	1100 ^d
raulic equipment, transformers)c Tank failure (rupture or leak)	113	TBDd	TBDd	TBDd
Tank failure (rupture or leak)	328	TBDd	TBDd	TBDd
Tank failure (rupture or leak)	263	TBDd	TBDd	TBDd
Tank failure (rupture or leak)	209	TBDd	TBDd	TBD⁴
Tank failure (rupture or leak)	172	TBDd	TBDd	TBDd
is loaded to or from a container, pipe or	other piece of	equipment.)	1	1
ipment (e.g. flow-through process vesse	ls at an oil prod	duction facility)	•	
	Tank failure (rupture or leak) Tank failure (rupture or leak)	Tank failure (rupture or leak) Tank failure (rupture or leak)	ble Containersb Tank failure (rupture or leak) Tank failure (rupture or leak)	ble Containers ^b Tank failure (rupture or leak) Tank failure (rupture or leak)

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

^c For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

^d This information will be completed once the Site determines which mobile equipment will be stored at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

(a)(4), 112.9(c)(3), 112.12(c)(0) and (a)(4)).	
Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. [$\S\S112.8(c)(6)$ and $(d)(4)$, $112.9(c)(3)$, $112.12(c)(6)$ and $(d)(4)$]	
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk st containers and piping at this facility:	
Per 40 CFR 112.7, inspections and tests will be conducted as follows. A record of inspections and tests, signed be appropriate supervisor or inspector, must be kept with the SPCC for a period of at least three years.	y the
Per 40 CFR 112.8(c)(6), inspections and testing for each aboveground storage container must be in accordance industry standards.	with
Portable containers like fuel tanks and hydraulic systems associated with the mobile equipment will be visually inspected monthly for signs of deterioration, discharges, or accumulation of oil around the tanks and systems. Liquevel sensing devices must be regularly tested to ensure proper operation.	Įuid
The two bulk storage oil tanks are 500 and 1000 gallons and are double-walled. These tanks must be visually ins monthly for signs of deterioration, discharges or accumulation of oil. This inspection program is consistent with instandards. Furthermore, supports and foundations of these tanks will be inspected for deterioration or damage the affect the tank. Liquid level sensing devices will be regularly tested to ensure proper operation. Each tank will also inspected whenever repairs are made. Inspections will be performed and documented using the Monthly SPCC Finspection Form in Attachment 3.1 - Inspection Log and Schedule.	dustry at may o be
All facility personnel who are involved in oil-handling/response activities shall receive annual training on spill prev and response that includes discharge prevention briefings in accordance with 40 CFR 112.7(f). These briefings sl cover, if applicable, past reportable discharges or failures, malfunctioning components, and any recently develope precautionary measures. Monthly inspections will be performed using an inspection log [See Attachment 3.1] that be completed and signed by the person conducting the inspection. These records will given to the SPCC Coordin who will keep them on file with the SPCC Plan. Per 40 CFR 112.7(e), inspection records will be kept at the facility the SPCC plan for a period of at least three years.	hould ed t will nator,
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of	
this paragraph. [§112.7(e)] A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. [§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]	
Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	\boxtimes
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges;	
discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. [§112.7(f)]	
A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)]	
Name/Title: TBD	
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. [§112.7(f)] [See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]	

4. Security (excluding oil production facilities) §112.7(g):

Table G-6 Implementation and Description of Security Measures

Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.

 \boxtimes

The following is a description of how you secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

During business hours, personnel will be on site to monitor unauthorized access to oil processing and to discover oil discharges. The facility will have locking doors that will remain locked outside business hours. The facility will be under 24/7 video surveillance and will have sufficient security lighting to deter trespassing and vandalism, as well as assist in the discovery of discharges at this facility.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

Table G-7 Description of Emergency Procedures and Notifications

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

In the event of an incidental spill or minor discharge (small quantity of product, easily stopped, not likely to reach water, and manageable by Gales Ferry Intermodal employees), the discharge will be managed as follows:

- Immediately notify the Plant Manager.
- Stop the discharge, if practicable.
- Contain the discharge with discharge response materials and equipment such as sorbent pads and speedi-dry. Spill kits will be available where the potential for spills exists. Discharge debris should be placed in properly labeled waste containers.
- The Plant Manager or their designee shall report spills, which have the potential to affect human health or to reach the environment, to the Connecticut Department of Energy & Environmental Protection (CT DEEP) immediately after the spill, according to the contact information in Section 6.
- The Plant Manager, or his designee, shall complete the Discharge Notification Form (Appendix 4) and maintain a copy of the form with this Plan.

In the event of a major discharge that cannot be safely controlled, cannot be cleaned by facility personnel, discharges into water, or creates a danger of fire or explosion, the discharge should be addressed as follows:

- Immediately notify the Plant Manager.
- The Plant Manager, or his designee, shall notify the spill response and cleanup contractors according to the Contact List in Section 6.
- The Plant Manager, or his designee, shall notify medical assistance if employees are injured, the Fire Department if there is risk of fire, and the CT DEEP according to the Contact List in Section 6.
- If the discharge reaches navigable water, the Plant Manager or his designee shall contact the National Response Center (NRC) according to the Contact List in Section 6.
- The Plant Manager, or his designee, shall coordinate cleanup activities and ensure cleanup debris is properly disposed of.
- The Plant Manager, or his designee, shall complete the Discharge Notification Form (Appendix 4) and maintain a copy of this form with this Plan.

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Co	ontact List
Contact Organization / Person	Telephone Number
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Kropp Environmental Contractors	1-860-642-9952
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: Chase Davis, Operations Specialist	Office: 1-781-789-9397
	Emergency: 1-781-789-9397
Plant Manager, TBD	Office: TBD
	Emergency: TBD
Plant Manager Designee, TBD	Office: TBD
	Emergency: TBD
	Office:
	Emergency:
State Oil Pollution Control Agencies Connecticut Department of Energy & Environmental Protection (CT DEEP)	1-860-424-3338
Other State, Federal, and Local Agencies	
Local Fire Department Gales Ferry Volunteer Fire Company	1-860-464-7228
Local Police Department Ledyard Police Department	1-860-464-6400
Hospital Lawrence + Memorial Hospital	1-860-442-0711
Other Contact References (e.g., downstream water intakes or neighboring facilities) Pequot Health Center	1-860-446-8265

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines [See Discharge Notification Form in Attachment 4]: [§112.7(a)(4)]



- The exact address or location and phone number of the facility;
- Date and time of the discharge;
- Type of material discharged;
- · Estimate of the total quantity discharged;
- Estimate of the quantity discharged to navigable waters;
- Source of the discharge;

- · Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

- (1) Name of the facility;
- (2) Your name:
- (3) Location of the facility;
- (4) Maximum storage or handling capacity of the facility and normal daily throughput;
- (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- (7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

* * * * *

NOTE: Complete one of the following sections (A, B or C) as appropriate for the facility type.

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. In cases where a provision is not applicable, write "N/A".

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and		
112.12(b)(1)] Valves of manual, open-and-closed design are used for the drainage of diked areas. [§§112.8(b)(2) and		
112.12(b)(2)]		
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. [$\S\S112.8(c)(1)$ and $112.12(c)(1)$]	\boxtimes	
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]		
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: [§§112.8(c)(3) and 112.12(c)(3)]		
Bypass valve is normally sealed closed	П	
Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines		
Bypass valve is opened and resealed under responsible supervision		\boxtimes
Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]		
For completely buried metallic tanks installed on or after January 10, 1974 at this facility [§§112.8(c)(4) and 112.12(c)(4)]:		
Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.		
Regular leak testing is conducted.		
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]:		
Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.		\boxtimes
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.8(c)(6) and §112.12(c)(6)(i)]		
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or	\boxtimes	
accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]		
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.21 [§112.12(c)(6)(ii)]		

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Each container is provided with a system or documented procedure to prevent overfills for the container. Describe:	\boxtimes	
All oil storage containers will be filled within secondary containment. All tank containers have level gauges that personnel must visually assess to verify the container has enough free capacity to receive the volume of oil being transferred. All containers must be carefully monitored during the entirety of filling activities. Spill response equipment (i.e. spill kits) must be readily available near containers being filled.		
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]	\boxtimes	
Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. [§§112.8(c)(10) and 112.12(c)(10)]	\boxtimes	
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]	\boxtimes	
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]		

B. Onshore Oil Production Facilities (excluding drilling and workover facilities) (§112.9(b), (c), and (d)):

The owner or operator must meet the general rule requirements as well as the requirements under this section. Note that not all provisions may be applicable to all owners/operators. In cases where a provision is not applicable, write "N/A".

Table G-11 General Rule Requirements for Onshore Oil Production Facilities	N/A
At tank batteries, separation and treating areas, drainage is closed and sealed except when draining uncontaminated rainwater. Accumulated oil on the rainwater is returned to storage or disposed of in accordance with legally approved methods. [§112.9(b)(1)]	
Prior to drainage, diked areas are inspected and [§112.9(b)(1)]: • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters	\boxtimes
 Bypass valve is opened and resealed under responsible supervision 	
 Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3] 	
Field drainage systems and oil traps, sumps, or skimmers are inspected at regularly scheduled intervals for oil, and accumulations of oil are promptly removed [See Inspection Log and Schedule in Attachment 3.1] [§112.9(b)(2)]	
The containers used at this facility are compatible with materials stored and conditions of storage. [§112.9(c)(1)]	
All tank battery, separation, and treating facility installations (except for flow-through process vessels) are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond. [§112.9(c)(2)]	
Except for flow-through process vessels, containers that are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. [See Inspection Log and Schedule in Attachment 3.1] [§112.9(c)(3)]	
New and old tank batteries at this facility are engineered/updated in accordance with good engineering practices to prevent discharges including at least one of the following:	
 i. adequate container capacity to prevent overfill if regular pumping/gauging is delayed; ii. overflow equalizing lines between containers so that a full container can overflow to an adjacent container; iii. vacuum protection to prevent container collapse; or iv. high level sensors to generate and transmit an alarm to the computer where the facility is subject to a computer production control system. [§112.9(c)(4)] 	
Flow-through process vessels and associated components are:	
 Are constructed with a capacity to hold the largest single container plus additional capacity to contain rainfall. Drainage from undiked areas is safely confined in a catchment basin or holding pond; [§112.9(c)(2)] and 	
 That are on or above the surface of the ground, including foundations and supports, are visually inspected for deterioration and maintenance needs on a regular schedule. [See Inspection Log and Schedule in Attachment 3.1] [§112.9(c)(3)] 	
Or	
 Visually inspected and/or tested periodically and on a regular schedule for leaks, corrosion, or other conditions that could lead to a discharge to navigable waters; and 	
 Corrective action or repairs are applied to flow-through process vessels and any associated components as indicated by regularly scheduled visual inspections, tests, or evidence of an oil discharge; and 	
 Any accumulations of oil discharges associated with flow-through process vessels are promptly removed; and 	
• Flow-through process vessels are provided with a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation within six months of a discharge from flow-through process vessels of more than 1,000 U.S. gallons of oil in a single discharge as described in §112.1(b), or a discharge more than 42 U.S. gallons of oil in each of two discharges as described in §112.1(b) within any twelve month period. [§112.9(c)(5)] (Leave blank until such time that this provision is applicable.)	

Table G-11 General Rule Requirements for Onshore Oil Production Facilities		N/A
All aboveground valves and piping associated with transfer operations are inspected periodically and upon a regular schedule. The general condition of flange joints, valve glands and bodies, drip pans, pipe supports, pumping well polish rod stuffing boxes, bleeder and gauge valves, and other such items are included in the inspection. [See Inspection Log and Schedule in Attachment 3.1] [§112.9(d)(1)]		
An oil spill contingency plan and written commitment of resources are provided for flowlines and intrafacility gathering lines [See Oil Spill Contingency Plan and Checklist in Attachment 2 and Inspection Log and Schedule in Attachment 3.1] [§112.9(d)(3)] or		\boxtimes
Appropriate secondary containment and/or diversionary structures or equipment is provided for flowlines and intra-facility gathering lines to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from the pipe, will not escape the containment system before cleanup occurs.		
A flowline/intra-facility gathering line maintenance program to prevent discharges from each flowline has been established at this facility. The maintenance program addresses each of the following:		
 Flowlines and intra-facility gathering lines and associated valves and equipment are compatible with the type of production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in the operational environment; 		
 Flowlines, intra-facility gathering lines and associated appurtenances are visually inspected and/or tested on a periodic and regular schedule for leaks, oil discharges, corrosion, or other conditions that could lead to a discharge as described in §112.1(b). The frequency and type of testing allows for the implementation of a contingency plan as described under part 109 of this chapter. 		
 Corrective action and repairs to any flowlines and intra-facility gathering lines and associated appurtenances as indicated by regularly scheduled visual inspections, tests, or evidence of a discharge. 		
 Accumulations of oil discharges associated with flowlines, intra-facility gathering lines, and associated appurtenances are promptly removed. [§112.9(d)(4)] 		
The following is a description of the flowline/intra-facility gathering line maintenance program implemented a facility:	a triis	
C. Onshore Oil Drilling and Workover Facilities (§112.10(b), (c) and (d)):		
The owner or operator must meet the general rule requirements as well as the requirements under this section.		
Table G-12 General Rule Requirements for Onshore Oil Drilling and Workover Facilities		
Mobile drilling or worker equipment is positioned or located to prevent discharge as described in §112.1(b).		

Table G-12 General Rule Requirements for Onshore Oil Drilling and Workover Facilities						
Mobile drilling or worker equipment is positioned or located to prevent discharge as described in §112.1(b).						
[§112.10(b)]						
Catchment basins or diversion structures are provided to intercept and contain discharges of fuel, crude oil, or						
oily drilling fluids. [§112.10(c)]						
A blowout prevention (BOP) assembly and well control system was installed before drilling below any casing						
string or during workover operations. [§112.10(d)]						
The BOP assembly and well control system is capable of controlling any well-head pressure that may be						
encountered while the BOP assembly and well control system are on the well. [§112.10(d)]						

ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility							
Review Date	Plan An	nendment	Name and signature of person authorized to review this				
	Will Amend	Will Not Amend	Plan				
		П					
		_					

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

	Table G-15 Description and Certification of Technical Amendments							
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment						
July 10, 2023	Initial Issuance of Tier I SPCC Plan	Chase Davis						

ATTACHMENT 2 - Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment.

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written	
commitment of manpower, equipment and materials required to expeditiously control and remove any quantity	Ш
of oil discharged that may be harmful is attached to this Plan.	

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Remo Contingency Plans (§109.5) ^a					
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.					
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:					
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.					
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).					
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.					
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:					
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.					
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.					
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.					
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:					
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.					
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.					
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.					
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.					
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.					
(6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.					

Facility Name: Gales Ferry Intermodal

^a The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule									
This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.									
Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately ^a				

^a Indicate in the table above if records of facility inspections are maintained separately at this facility.

ATTACHMENT 3.1 – Inspection Log and Schedule Gales Ferry Intermodal, Sterling Facility Gales Ferry, CT

MONTHLY SPCC PLAN INSPECTION FORM

Ve	r 1	-F-	doc-	3-1	8-1	I C

Inspector Name:			Signature of Inspector:					
Date of Insp	Date of Inspection:				Time of Inspection:			
Environmen	tal Review (Name & Signatu	re & Date):						
Storage Con	tainers							
Item(s)	Criteria	Satisfactory	Unsatisfactory	NA	Notes If "Unsatisfactory," explain why and note the corrective action(s) taken. If applicable, include the relevant Work Order Number.	Date Corrective Action(s) Completed		
	Is the area clear of debris/vegetation?							
	Are there oil stains on the outside of the container (including the underside)? Is there oil on the ground around the container?							
Used OilTank	Is there rust, paint peeling, or other signs of corrosion on the container?							
DieselStorageTank	Is there corrosion at fittings, joints, or seals?							
	Are there any raised spots or dents on the container surface?							
	Does the foundation appear to have shifted or settled?							

properly?

Is the fuel gauge working

Are all vents clear so they may properly operate?

ATTACHMENT 3.1 – Inspection Log and Schedule Gales Ferry Intermodal, Sterling Facility Gales Ferry, CT

MONTHLY SPCC PLAN INSPECTION FORM

Ver. 1-E-doc-3-18-10

Mobile Equip	Mobile Equipment					
Item(s)	Criteria	Satisfactory	Unsatisfactory	NA	Notes If "Unsatisfactory," explain why and note the corrective action(s) taken. If applicable, include the relevant Work Order Number.	Date Corrective Action(s) Completed
	Are there oil stains on the outside of the container (including the underside)?					
	Is there oil on the ground around the container?					
. I a a da a	Is there rust, paint peeling, or other signs of corrosion on the container?					
LoaderExcavatorCrawlerCrane	Is there corrosion at fittings, joints, or seals?					
Crune	Are there any raised spots or dents on the container surface?					
	Is the fuel gauge working properly?					
	Are all vents clear so they may properly operate?					

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule							
Container Size and Design Specification	Inspection requirement						
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas						
55 to 1,100 gallons with sized secondary containment 1,101 to 5,000 gallons with sized secondary containment and a means of leak detection ^a	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards						
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection ^a	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards						

^a Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.3 – Dike Drainage Log (N/A)

	Table G-18 Dike Drainage Log								
Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector			

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

	Table G-19 Oil-Handling Personnel Training and Briefing Log Date Description / Scope Attendees						
Date	Description / Scope	Attendees					
	•						

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center [also see the notification information provided in Section 7 of the Plan]:

Table G-20 Information provided to the National Response Center in the Event of a Discharge				
Discharge/Discovery Date		Time		
Facility Name				
Facility Location (Address/Lat- Long/Section Township Range)				
Name of reporting individual		Telephone #		
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels	
Source of the discharge		Media affected	Soil	
			☐ Water (specify)	
			Other (specify)	
Actions taken				
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)	
Organizations and individuals	☐ National Response Center 800-424-8802 Time			
contacted	Cleanup contractor (Specify) Time			
	☐ Facility personnel (Specify) Time			
	State Agency (Specify) Time			
	Other (Specify) Time	3		

Action Your Spill Response Plan

When there is an oil or chemical spill in your organization, the last thing you want is untrained staff entering the spill site and attempting to assist. You also don't want to ignore the spill, only for staff to continue working in hazardous conditions.

As soon as a spill is noted at your site, you should immediately action your Spill Response Procedures in accordance with the Site Spill Prevention, Control and Countermeasure (SPCC) Plan. This usually requires notifying the relevant (trained) staff and supervisors, accessing the chemical's Safety Data Sheet and dressing in compliant PPE.

Stop The Spill from Spreading

Depending on the quantity of liquid leaked or spilled, you will have to immediately act to stop the oil spill from travelling further through the workplace. If it's safe for your staff to do so, make sure spill control equipment and absorbents (such as matts or pillows) are placed across the spill zone. You can also put down booms to stop the liquid from spreading further into the workplace.

Due to the threat of environmental contamination, make sure that any drains, sewers or stormwater systems are plugged or covered, so that oil can't contaminate the outside environment.

Isolate and Remove Ignition Sources

As hazardous and flammable vapors may be emitted from the spilled oil, the fast containment of the spill is fundamental for a safe and successful clean-up. You should ensure that the affected area is isolated from any types of ignition sources — and that no unauthorized staff enter the area while the clean-up is underway.

As oil can ignite if a flame or spark is introduced to the environment, the isolation of ignition sources is essential when dealing with an oil spill clean-up.

Clean-Up The Contaminated Oil

Now that your staff are dressed in the appropriate PPE, they can tend to the actual clean-up of the spilled oil. Equipment such as shovels, yard brooms and scoops can also assist with the removal of contaminated oil from the site.

Spill Kits and Defensive Actions

Spill kits shall be established at key locations throughout the site including in the 6,000 Square Foot Marine Industrial Building with Regional Office, in the 10,000 Square Foot Equipment Support Facility and Within the A-1 Laydown Area. The amount of spill materials kept at each location depends on the volume of oils stored there. Spill kit materials will assist in creating berms around and absorbing spilled oils. The absorbents are of two types: diatomaceous earth (Oil Sorb) and polypropylene. Oil Sorb is supplied in 25-pound paper bags. Polypropylene is supplied as socks, pillows, and pads.

The use and limitations of each is described below.

Absorbent Type	Use	Limitations(s)
Oil Sorb	, .	Can absorb its weight in oil. Will absorb both water and oil. Does not float on water.
Polypropylene		Can absorb 25 times its weight in oil. Will only absorb oil. Will float on water even if oil saturated.

Blocking/diking materials are also of two types: sandbags and elastomer mats and berms. The use and limitation of each is described below.

Diking Material Use Limitation(s)

Diking Material	Use	Limitations
Sandbags	Place in path of flow and butt the ends of the bags tightly to each other to form a barrier.	Getting a good seal between adjacent bags and the ground can be difficult. Use absorbent to catch leakage. Each bag weighs about 70 pounds and thus is difficult for some to move.
Elastomer Mats	Place over storm or sanitary drains to seal them.	May not completely cover some larger drains. May not form a perfect seal on rough surfaces or along curbs.
Elastomer Berms	Place in the path of flow to form a barrier or lay around drain openings to form a barrier.	May not completely encircle some larger drains. May not form a perfect seal on rough surfaces or along curbs.

Spill Kits Recommended for this Site (refer to attached Site Plan for locations)

Three (minimum) 55-gallon drum spill kits are recommended containing the following materials;

- (50) 15 x 19" Pads
- (4) 3" x 12' Sorbent Socks
- (8) 18 x 18" Pillows
- (1) pair Nitrile Gloves
- (1) Emergency Handbook
- (1) pair Goggles
- (5) Disposal Bags

Incidental Oil Spill Response Procedures

An incidental spill is a manageable spill that poses low risk to safety and health and is not likely to adversely impact the environment. Incidental oil spill response procedures are as follows:

- Eliminate the source of the spill by up righting drums or other containers, closing valves, or other similar actions.
- Prevent the oil from leaving the building, spreading to adjacent areas, or entering drains by absorbing flowing oil, diking the area, and/or using drain plugs/barriers.
- Spread absorbents over the surface of the spill working from the perimeter of the spill to its center. Socks and pillows work best on pooled liquid while pads have an advantage on thin layers of oil.
- Call the Operations Specialist, Chase Davis at 781-789-9397 if assistance in spill control and clean-up is necessary.

Emergency Oil Spills

The Incidental Oil Spill procedures must be modified for a spill that is an emergency. An emergency situation exists when:

- The quantity of spilled oil is 25 gallons or larger, or
- The spill has entered a sanitary or storm drain, or
- The spill has entered a ground or surface water, or
- The spill cannot be contained or stopped, or
- The spill poses a fire/explosion hazard, or
- Additional spill equipment is needed and is not immediately available.

In the case of an emergency spill, the person discovering it should summon emergency responders by dialing '911' and remain in the vicinity but at a safe distance until released by emergency responders. If it is safe to do so:

- Take action to stop the spill if it is continuing (i.e. shutting off valves, up righting containers, etc.),
- Take action to prevent the spill from entering sewers or streams and to minimize the area affected. Such actions might consist of absorbing flowing oil or diking the area with sandbags, elastomer mats, or elastomer berms, etc.

Disposal

Use the appropriate waste disposal bags/drums provided in your oil spill kit for the clean-up and disposal of the spilled chemicals.

Any waste that is a result of the oil spill must be handled and disposed of in a compliant manner. Licensed waste disposal contractors should be called upon so that they can dispose of the chemical waste, along with the soiled absorbent materials, clothing and other items used to clean-up the workplace oil spill.

Record The Spill Incident

Even small chemical spills should be recorded so that your workplace has an accurate record of any hazardous events that may occur.

As part of your report, you should also investigate the cause of the spillage, so you can identify and implement control measures to reduce the risk of the oil spill reoccurring in your workplace.

