UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ORIGINAL (Red)

ACKNOWLEDGEMENT AND RECORD OF SPCC/FRP INSPECTION

SPCC CASE NUMBER: PA-00-007 FRP REGIONAL ID#: PA FRP061 DATE: 12/8/99

TO: Regina A. Starkey, SPCC Coordinator (3HS32)
CC: Linda J. Ziegler, FRP Coordinator (3HS32) (only if FRP applicable)

Inspector's Printed Name/Signature: Neeraj Sharma / Neeraj Sharma

Inspection Team Members: Michael Welsh + Eduardo Rivera + Mike Wilson (SATA)

Name/Location of Facility: Tosco Refining Company, Trainer Refinery

Address: 4101 Post Road

City: Trainer County: Delaware State: PA Zip: 19061

Facility Contact/Title: James E. Fedena / Environmental, Health & Safety Supervisor

Telephone Number: (610) 364-8110

Name of Owner/Operator: Tosco Refining Company

Address:

City: State: Zip:

Telephone Number:

** See pages 10 to 11 for FRP only information

Synopsis of business operations: Refine crude oil into petroleum products (gasoline, distillate)

Route of entry and estimated distance to waterway: Marcus Hook Creek & Stoney Creek

Acknowledgement:

I acknowledge that an SPCC/FRP inspection of this facility was conducted on the 8th day of December, 19 99.

Facility Representative Printed Name/Signature:

NOTE: During this inspection the owner/operator of the facility was asked to provide an extra copy of the SPCC Plan, which will be submitted with this report to the SPCC Coordinator. An extra copy of the SPCC Plan was provided to the inspector (Y/N). If no, the owner/operator of the facility has been asked to send a copy of the SPCC Plan, if available, via certified mail, return receipt requested, within 14 days of the date of this inspection to the SPCC Coordinator (mail code 3HS32) at the address on this letterhead (Y/N).

[Original of this page to SPCC coordinator, copy to facility representative]

(9/98)

Record of SPCC/FRP Inspec n/Plan Review

Type of Facility (check all applicable descriptions):

- [ ] onshore
- [ ] offshore
- [ ] oil well drilling
- [ ] oil production
- [x] oil refining
- [x] oil storage
- [ ] industrial
- [ ] transformers/oil-filled equipt
- [ ] commercial
- [ ] agricultural
- [ ] public
- [ ] waste treatment
- [ ] loading racks
- [ ] vehicles/rail cars (in-facility)
- [ ] pipelines (in-facility)
- [ ] oil drum storage areas

Date of facility start operations: May 1997

Date facility first required plan: 1997

Oil storage capacity aboveground: 15~~8~~5,000,000 gallons

Oil storage capacity underground: None gallons

SPCC Plan prepared: Yes ** FRP Plan Prepared:

SPCC Plan available for review: Yes ** FRP Plan Available:

Facility normally attended at least 8 hours: 24-7 days hours

SPCC Plan Certified (seal affixed): Yes

Date Certified: 2/26/98

Name of Engineer: W. Christian Leuterite

License Number: PE-049402-R State: PA

SPCC Plan reviewed every three years: NA

Record of SPCC Plan review available: NA

Date(s) of Review(s): NA

Spill of more than 1000 gallons in past 12 months: No

If yes, date of spill: Was Plan submitted per 40 CFR 112.4:

Two spills of harmful quantity in past 12 months: No

If yes, dates of spills: Was Plan submitted per 40 CFR 112.4:

Has there been a change in facility design, construction, operation, maintenance which could affect the facility's potential for discharge? If so, describe: No, leaking line on bed creek
One spill

Date of Latest Change: Date Plan Amended:

[shaded areas represent FRP/SPCC information, ** represents FRP information only] (9/98)

The following information directly reflects the requirements of 40 CFR 112 as applicable to the facility inspected.

Facility Drainage, Onshore (excluding production facilities) [40CFR112.7(e)1]:

a.	from diked storage areas via valves:	(i)	Y
	valves manually operated:	(ii)	Y
b.	from diked storage areas via pumps or ejectors:	(i)	Y
	pumps or ejectors manually operated:	(ii)	N
c.	storm water inspected prior to discharge:	(ii)	Y
d.	from undiked areas into catchment basins:	(iii)	N
e.	if dikes or catchment basins are not utilized, is there a diversion system to return spills to the facility:	(iv)	N
f.	is drainage water treated at the facility:	(v)	Y

Inspector's comments on Facility Drainage, Onshore (excluding production facilities), based upon inspection:

Bulk Storage Tanks, Onshore (excluding production facilities) [40CFR112.7(e)2]:

a.	Material and construction of tanks compatible to the oil stored and the conditions of storage:	(i)	Y
b.	All Tank installations have secondary containment:	(ii)	Y
c.	Secondary containment appears to be adequate:	(ii)	Y
d.	Diked areas are sufficiently impervious:	(ii)	Y
e.	Drainage from diked areas to on-site treatment:	(iii)	Y
	If no, is the bypass valve normally sealed closed:	(iii)(A)	N
	Drainage from diked area is inspected:	(iii)(B)	
	Bypass valve is opened and resealed properly:	(iii)(C)	
	Adequate records of dike drainage are maintained:	(iii)(D)	
f.	Underground tanks at this facility:	(iv)	N
	Protected from corrosion:	(iv)	NA
	Pressure tested periodically:	(iv)	NA
g.	Partially buried tanks at this facility:	(v)	
	Buried sections protected from corrosion:	(v)	

h. Aboveground tanks at this facility: ..... (vi) Y

Subject to periodic integrity testing: ....all within last ten years by 2000 (vi) Y

Records of inspections maintained: ..... 40CFR112.7(e)8 Y

Internal heating coils utilized: ....To Sewer System (vii) Y

If yes, steam return/exhaust monitored: ..... (vii) Y

External heating system utilized: ..... (vii) N

Tanks are "fail-safe" engineered: ....Barges, pipeline automatic pumping (viii) Y

Audible high liquid level alarm: ....Sun oil - LPG, flow rate (viii)(A) Y

Visual high liquid level alarm: ..... maximum (viii)(A) Y

Automatic high liquid level pump cutoff: ..... (viii)(B) Y

Communications between gauger and pumping station: ....Radio contact (viii)(C) Y

System of determining liquid level in tanks such as

sensing devises: ..... (viii)(D) Y

Direct vision gauges: ..... (viii)(D) Y

Sensing devises and/or gauges regularly tested: ....Remote gauging (viii)(E) Y

i. Effluents discharges directly to navigable waters observed frequently to detect oil spills: ....NPDES outfalls ..... (ix) [ ]

j. Causes of oil leaks resulting in accumulations of oil in diked areas are promptly corrected: ..... (x) Y

k. Mobile or portable tanks at this facility: ..... (xi) Y

If yes, are positioned properly: ..... (xi) Y

A secondary means of containment is utilized: ..... (xi) Y

Inspector's comments on Bulk Storage Tanks, Onshore (excluding production facilities), based upon inspection: RCRA storage waste <90 days

Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities) [40CFR112.7(e)3]:

a. Buried pipelines are corrosion protected: ....Most is aboveground ..... (i) X N

b. Not-in-service pipelines are capped or blank-flanged, and marked as their origin: ..... (ii) Y

c. Pipe supports are designed to minimize abrasion and corrosion, and allow for expansion and contraction: ..... (iii) Y

d. Aboveground pipelines are inspected regularly: ..... (iv) Y

e. Periodic pressure testing is conducted: ....lines from the dock annually (v) Y

f. Vehicle traffic warned of aboveground pipelines: ....Plant wide corrosion man control (v) Y

Inspector's comments on Facility Transfer Operations, Pumping and In-Plant Processes, Onshore (excluding production facilities), base upon inspection:

Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore [40CFR112.7(e)4]:

a. Rack drainage flows to catchment basin: treatment plant, LPG ..... (ii) NA

Or drainage flows to treatment system: ..... (ii) NA

Or secondary containment is used: ..... (ii) NA

b. Is a system used to prevent vehicular departure before complete disconnect from transfer lines: ..... (iii) NA

interlock warning lights: ..... (iii) NA

physical barrier system: ..... (iii) NA

warning signs: ..... (iii) NA

c. Vehicle inspection before departing facility: ..... (iv) NA

Inspector's comments on Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, based upon inspection

Oil production Facilities, Onshore [40CFR112.7(e)5]:

a. Drainage from secondary containment systems at tank batteries and central treatment stations are closed and sealed at all times except when rainwater is being drained: ..... ☐

b. Prior to drainage, accumulated oil on the rainwater is picked up and returned to storage or disposed of: ..... ☐

c. Field drainage ditches, road ditches, and oil traps, sumps or skimmers are regularly inspected for oil: ..... ☐

Accumulated oil is removed: ..... ☐

d. Aboveground tanks at this facility: ..... ☐

Material and construction are compatible with the oil stored and the conditions of storage: ..... ☐

Secondary means of containment appears adequate: ..... ☐

Tank inspections are conducted periodically: ..... ☐

By a competent person: ..... ☐

Includes tank foundation and supports: ..... ☐

Tank battery installations fail-safe engineered: ..... ☐

Adequate tank capacity to prevent tank overfill: ..... ☐

Overflow equalizing lines between tanks: ..... ☐

Vacuum protection to prevent tank collapse: ..... ☐

High level alarms: ..... ☐

e. Facility transfer operations at this facility: ..... ☐

Aboveground valves/pipelines examined periodically: ..... ☐

Brine disposal facilities examined often: ..... ☐

Flowline maintenance program established: ..... ☐

Records of inspection maintained: ..... ☐

Inspector's comments on Oil Production Facilities, Onshore, based upon inspection:

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Oil Drilling and Workover Facilities, Onshore [40CFR112.7(e)6]:

a. Mobile drilling/workover equipment positioned to prevent spilled oil from entering waters: ☐

b. Secondary containment utilized: ☐

c. Blowout prevention (BOP) assembly utilized: ☐ *

d. Well control system utilized: ☐ *

NOTE: Casing and BOP installations should be in accordance with State regulatory agency requirements

Inspector's comments on Oil Drilling and Workover Facilities, Onshore, based upon inspection:

Oil Drilling and Workover Facilities, Offshore [40CFR112.7(e)7]:

a. Oil drainage collection equipment utilized: ☐
   Drains controlled/directed to central collection: ☐

b. Sump system, if used, adequate sized: ☐
   Spare pump/equivalent method available: ☐

c. Separators/treaters equipped with dump valves: ☐
   Measures in place should dump valve fail: ☐

d. Atmospheric storage/surge tanks equipped with high level sensing devices: ☐

e. Pressure tanks equipped with high and low pressure sensing devices: ☐

f. Tanks are corrosion protected: ☐

g. Written procedure for inspecting and testing pollution prevention equipment and systems prepared: ☐
   Written procedure maintained at the facility: ☐
   Written procedure included in SPCC Plan: ☐
   Inspections and tests conducted periodically: ☐

h. Surface and subsurface well shut-in valves and devices are sufficiently described: ☐
   Detailed records for each well maintained: ☐

i. Blowout prevention (BOP) assembly utilized in accordance with State regulatory agency requirements: ☐

j. Well control measures provided in the event of emergency conditions: ☐

k. Written instructions are prepared for contractors and subcontractors by the owner or operator: ☐
   Such instructions are maintained at the facility: ☐

l. Manifolds are equipped with check valves: ☐

m. Flowlines are equipped with high pressure sensing device and shutin valve at the wellhead: ☐
   If no, a pressure relief system is provided: ☐

n. Pipelines are corrosion protected: ☐

o. Sub-marine pipelines are stress protected: ☐
   Sub-marine pipelines are inspected periodically: ☐
   Inspections are documented and maintained: ☐

Inspector's comments on Oil Drilling and Workover Facilities, Offshore, based upon inspection:

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Inspection and Records [40CFR112.7(e)8]:

a. Inspections required by 40 CFR 112 are in accordance with written procedures developed for the facility: ~~monthly~~ daily written [Y]

b. Written procedures and a record of inspections are signed by the appropriate supervisor or inspector: monthly [Y]

c. Written procedures and a record of inspections are made part of the SPCC Plan: [Y]

d. Written procedures and a record of inspections are maintained for a period of 3 Years: [Y]

Inspector's comments on Inspections and Records, based upon inspection:

Security (excluding oil production facilities) [40CFR112.7(e)9]:

a. Facility is fully fenced: (i) [Y]

b. Entrance gates locked and/or guarded: (i) [Y]

c. Master flow and drain valves secured in closed position when in a non-operating or non-standby status: ~~[illegible]~~ wastewater closed (ii) [N]

d. Starter control on pumps locked in the "off" position or located at a site accessible only to authorized personnel when in a non-operating or non-standby status: (iii) [Y]

e. Loading/unloading connection of pipelines are capped or blank-flanged when not in service: (iv) [Y]

f. Facility lighting appears to be adequate to facilitate the discovery of spills during hours of darkness and to deter vandalism: (v) [Y]

Inspector's comments on Security (excluding oil production facilities), based upon inspection:

Personnel Training and Spill Prevention Procedures [40CFR112.7(e)10]:

a. Personnel properly instructed in spill prevention (i) [Y]

b. Designated person accountable for spill prevention: (ii) [Y]

c. Spill prevention briefings scheduled periodically: [Y]

Dates of Discharge Prevention Meetings: once a yr

Inspector's comments on Personnel Training and Spill Prevention Procedures, based upon inspection:

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Aboveground Storage Tank and Appurtenances Inspection Checklist: [40CFR §112.7(e)]

1. Check Tanks for leaks, specifically looking for
   - a. Discolorations of tanks ..... 2(vi) ☐
   - b. Corrosion ..... 2(vi) ☐
   - c. Cracks ..... 2(vi) ☐
   - d. Drip marks and stains ..... 2(x) ☐
   - e. Puddles of stored material ..... 2(x) ☐
   - f. Localized dead vegetation ..... 2(x) ☐

2. Check Foundations for
   - a. Cracks ..... 2(vi) ☐
   - b. Settling ..... 2(vi) ☐
   - c. Gaps between tank and foundation ..... 2(vi) ☐
   - d. Discoloration ..... 2(vi) ☐
   - e. Puddles of stored material ..... 2(x) ☐

3. Check pipes and valves for
   - a. Presence of stored material on valves ..... 2(x) ☐
   - b. Evidence of leakage at joints and seams ..... 2(x) ☐
   - c. Localized dead vegetation ..... 2(x) ☐
   - d. Bowing of pipes between supports ..... 3(iii) ☐
   - e. Droplets of stored material ..... 3(iv) ☐
   - f. Discoloration ..... 3(iv) ☐
   - g. Corrosion ..... 3(iv) ☐

Inspector's comments on Aboveground Storage Tank and Appurtenances, based upon inspection:

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Inspector's comments on Underground Storage Tank and Appurtenances, based upon inspection:

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Secondary Containment Checklist: [40CFR §112.7(e)]

1. Secondary Containment (dike or berm system)
   - a. Drainage mechanism manually operated ..... 1(ii) ☐
   - b. Capacity appears adequate ..... 2(ii) ☐
   - c. Sufficiently impervious to stored materials ..... 2(ii) ☐
   - d. Standing water within dike or berm ..... 2(ii) ☐
   - e. Debris/vegetation within the dike or berm area ..... 2(ii) ☐
   - f. Erosion or corrosion of dike or berm ..... 2(ii) ☐
   - g. Presence of stored material within dike or berm ..... 2(x) ☐

2. Secondary Containment (other systems such as moat, catch-basin, pond, etc)
   - a. Capacity appears adequate ..... 2(ii) ☐
   - b. Drainage mechanism manually operated ..... 2(ii) ☐
   - c. Standing water within the secondary containment system ..... 2(ii) ☐
   - d. Debris/vegetation within the secondary containment system ..... 2(ii) ☐
   - e. Erosion or corrosion of the secondary containment system ..... 2(ii) ☐
   - f. Presence of stored material within secondary containment ..... 2(x) ☐

3. Secondary Containment (drainage systems)
   - a. Drainage adequate to return spilled material to facility ..... 2 ☐

4. Secondary Containment (none or inadequate) 40CFR §112.7(d)
   - a. Demonstration of impracticability ..... ☐
   - b. Contingency Plan developed per 40 CFR 109 ..... ☐
   - c. Written commitment ..... ☐

Inspector's comments on Secondary Containment, based upon inspection:

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Check the appropriate box:

- [ ] THIS FACILITY IS NOT SUBJECT TO FRP REGULATIONS
- [ ] IS A COPY OF ATTACHMENT C-II FILLED OUT AND MAINTAINED WITH THE SPCC PLAN? IF NO PROVIDE A COPY AND REQUEST FILLED OUT FORM BE PROVIDED ALONG WITH THE SPCC PLAN.
- [ ] THIS FACILITY IS SUBJECT TO FRP REGULATIONS BUT HAS NOT PROVIDED A COPY TO EPA REGION III

**** (THIS SECTION APPLIES TO FRPS ONLY)**

The following 3 lines to be filled out before on-site inspection:

FRP Regional ID # _____ Reviewer Name _____ Date of FRP Plan Review Checklist _____

The following records will be checked:

Personnel Response Training

Name/Position	Response Training/Date/No. of Hrs	Prevention Training/Date/No. of Hrs
Hazmat		
Fire response		

Note: If appropriate, a copy will be photocopied during the inspection and noted comments.

1000 hrs response drills

Drills

QI Notification Drill Dates (Quarterly):

Facility Deployment Drill Dates (Semi-Annual):

OSRO Deployment Drill Dates (Annual):

Tabletop Drill Dates (Annual):

Unnannounced Exercise Dates (Annual):

Response Equipment Inspection Dates (Monthly):

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ATTACHMENT C-II (40 CFR Part 112 - FRP Final Rule p. 34105)

Certification of the Applicability of the Substantial Harm Criteria

Facility Name: _____

Facility Addresses: _____

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

   Yes ☐ No ☐

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

   Yes ☐ No ☐

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such as that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

   Yes ☐ No ☐

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?

   Yes ☐ No ☐

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

   Yes ☐ No ☐

Certification

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

Signature: _____ Name (Please type or print): _____

Title: _____ Date: _____

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

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RESPONSE EQUIPMENT INSPECTION LOG	
Equipment	Comments
Boom	
Fire response	

Note: These two logs are available in full-page format (additional copies are available at the office). If additional forms are needed they should be attached at the end of the inspection form and so noted on this page.

PHOTO LOG			
Case #		Roll #	
Picture #	Description		
#2	Pipline near Tank 96 - pipeline in contact w/ earth		
Pict #1	Pipe near Tank 184 - unknown origin		
	" " Tank 56 - Partially buried		