Spill Prevention, Control, and Countermeasure Plan

Harcros Chemicals Inc.
584 N. Fairview Avenue
St. Paul, MN 55104

Antea Group Project No. HC18125703
February 2019

Prepared for:
Harcros Chemicals Inc.
584 N. Fairview Avenue
St. Paul, MN 55104

Prepared by:
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Table of Contents

Tables

Figures

Appendices

Harcros Chemicals Inc.
584 N. Fairview Avenue
St. Paul, MN 55104

PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(d)(1))

I hereby certify that:

a. I am familiar with the requirements of 40 CFR 112 - Oil Pollution Prevention.
b. I, or my agent, has visited and examined the facility (see SPCC Review Log, page iii).
c. This Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112.
d. Procedures for required inspection and testing have been established, and
e. The plan is adequate for the facility.

2/21/2019

Mark D. Nelson, P.E. **Date**
Minnesota Registered P.E. No. 25828

I hereby certify that this plan, document, or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the Laws of the State of Minnesota.

Mark D. Nelson
Date 2/21/2019 License: 25828

MANAGEMENT COMMITMENT (40 CFR 112.7(d)(2))

Full approval of this Spill Prevention, Control and Countermeasure Plan is extended by the management at the Harcros Chemicals Inc. facility in St. Paul, Minnesota at a level of authority to commit the necessary resources (labor, equipment, materials, and funds) for its implementation.

_____ _____

Craig Mader Date

District Manager

SPILL PREVENTION, CONTROL AND COUNTERMEASURE

PLAN 5-YEAR COMPLIANCE REVIEW [40 CFR 112.5(b)]

Harcros Chemicals Inc. must review and evaluate this SPCC Plan at least once every five years per Title 40 Code of Federal Regulations (CFR) [§112.5(b)]. Following this review and evaluation, Harcros Chemicals Inc. must amend the SPCC Plan within 6 months of the review to include more effective prevention and control technologies if they: (1) will significantly reduce the likelihood of a discharge from the facility, and (2) have been field-proven at the time of review. Amendments to this plan must be implemented as soon as possible, but not later than six months following preparation of any amendment. Amendment of the Plan is also required in the event the facility undergoes a "material change" as defined by 40 CFR §112.5(a). If equivalent environmental protection or an impracticability determination for containment or diversionary structures/equipment has been certified in this Plan by a Professional Engineer, changes to these requirements are considered technical amendments and require a Professional Engineer Certification [40 CFR §112.6(b)(2)(i)].

Review and evaluation of the SPCC Plan for the Harcros Chemicals Inc. facility has been completed on the dates shown below. The plan has been amended for the reasons noted below.

REVIEW DATES [Required every five years]	REASON FOR CHANGES
*January 2019	Technical Amendment to address five-year full SPCC Plan review including AST removal and address additional drums.

Notes:

1. Place an asterisk (*) by those review dates where the SPCC Plan was amended and summarize the amendment in the table above. Non-technical amendments, such as changes to phone numbers, names, etc., do not require Professional Engineer Certification [40 CFR §112.3(d)].

2. A Professional Engineer must certify technical amendments to equivalent environmental protection or an impracticability determination for containment or diversionary structures/equipment in this Plan. If a technical amendment was made, include the additional Professional Engineer Certification [40 CFR §112.5(c)].

3. This SPCC Plan complies with the provisions of 40 CFR §112

Note: See Sections 3.3 and 3.4 of this SPCC Plan for information on the required frequency of Plan review and amendment.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN [40 CFR 112.7]

HARCROS CHEMICALS INC.

St. Paul, MN

1.0 INTRODUCTION

This document is the Spill Prevention Control and Countermeasure Plan (SPCC Plan or Plan) for the Harcros Chemicals Inc. facility located at 584 N. Fairview Avenue, St. Paul, Minnesota, which shall be referred to herein as the facility. This Plan describes measures the facility takes to prevent oil discharges to the navigable waters of the United States. The Plan focuses on prevention and control measures, but also includes response procedures to be followed to minimize potential impacts in the event a spill occurs, and to assure appropriate internal and external reporting. The Plan is prepared according to requirements that appear in 40 CFR §112. Copies of this Plan are kept on file at the facility. This Plan follows the general sequence specified in 40 CFR §112.7; therefore, a section cross-referencing supplement is not required.

2.0 GENERAL FACILITY INFORMATION

Facility Name:	Harcros Chemicals Inc.
Facility Owner:	Harcros Chemicals Inc.
Mailing Address:	584 N. Fairview Avenue, St. Paul, MN 55104
Physical Address:	584 N. Fairview Avenue, St. Paul, MN 55104
Telephone Number:	651-647-0149
Facility Management:	Craig Mader
Environmental Management:	Kevin Roepe

3.0 PLAN ADMINISTRATION

Responsibility for day-to-day administration of this SPCC Plan and all discharge prevention activities are assigned to the District Manager.

3.1 Plan Certification [40 CFR 112.3(d) and 40 CFR 112.5(c)]:

40 CFR §112.3(d) requires that the SPCC Plan be reviewed and certified by a registered Professional Engineer who is familiar with the facility and its operation. 40 CFR §112.5(c) requires that technical amendments to the Plan also be certified by a Professional Engineer. The Professional Engineer's certification for the Plan appears on a separate page at the beginning of the Plan.

3.2 Plan Availability (40 CFR 112.3(e)):

A current, printed version of the Plan will be maintained and available onsite in the District Manager's office.

3.3 Plan Amendments (40 CFR 112.4, and 40 CFR 112.5(a)):

The District Manager is responsible for initiating, tracking and implementing Plan amendments. Two types of Plan amendments are described in the Part 112 Rules:

Amendments Required by United States Environmental Protection Agency (EPA) (40 CFR 112.4)

If more than 1,000 gallons of oil are spilled into navigable waters in a single discharge event, or more than 42 gallons in each of two discharge events within any 12-month period, a report shall be submitted to EPA within 60 days of the triggering discharge event. The report shall include:

- Name of the facility;
- Name of Person submitting the report;
- Location of the facility;
- Maximum storage capacity of the facility and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of the facility including maps, flow diagrams, and topographical maps;
- The cause of the discharge including a failure analysis;
- Additional preventive measures to minimize recurrence; and,
- Other information as may reasonably be required.

If the EPA determines that the Plan is inadequate, amendments may be required.

Amendments by Facility [40 CFR 112.5(a)]

The facility will amend the Plan whenever a change occurs that materially affects the facility's potential to discharge oil to navigable water. The Plan will be amended within six months of the change. The amended Plan will be implemented as soon as possible, but no later than six months after the Plan is amended.

3.4 Periodic Plan Review [40 CFR 112.5(b)]:

The Plan will be reviewed and evaluated at least once every five years as required by 40 CFR §112.5(b). If proven prevention and control technologies are identified in the review/evaluation that will significantly reduce the likelihood of a spill event, the Plan will be amended within six months of the review. Any amendments will be implemented as soon as possible, but not later than six months after the amendment.

Periodic reviews will be appropriately documented. The District Manager will maintain appropriate documentation of the status of any items being addressed as a result of the review. As required by §112.5(b), a signed certification shall be added to the Plan that attests whether the Plan will be amended as a result of the review. The review certification page will appear at the beginning of this Plan.

All technical amendments will be certified by a Professional Engineer (P.E.)

If technical amendments are required, the District Manager is responsible for ensuring the amendments to the SPCC Plan are certified by a Registered P.E.

The following changes are not considered technical changes:

- Changes to the Contact List (Appendix D).
- More stringent requirements for stormwater discharges to comply with NPDES rules.
- Phone numbers.
- Product changes if the new product is compatible with conditions in the existing tanks and secondary containment.
- Any other changes which do not materially affect the facility's potential to discharge oil.

The following changes are considered technical amendments:

- Commissioning or decommissioning containers.
- Replacement, reconstruction, or movement of containers.
- Reconstruction, replacement, or installation of piping systems.
- Construction or demolition that might alter secondary containment structures.
- Changes to product or service.
- Revision of standard operation or maintenance procedures at the facility.

4.0 GENERAL REQUIREMENTS

General requirements for SPCC Plans are set forth in 40 CFR §112.7. Specific requirements for the types of oil used and stored at the facility are described in 40 CFR §112.8. Each applicable requirement is discussed in the following sections. Information is presented in the general sequence shown in 40 CFR §112.7. The locations of any items not discussed in this sequence are clearly referenced. Some elements of Sections §112.8 duplicate items from Section §112.7, in which case further discussion or reference may not be provided.

4.1 Management Commitment (40 CFR 112.7):

The facility is committed to provide the necessary resources (labor, equipment, materials, and funds) necessary to fully implement this SPCC Plan. Site management's acknowledgement of this commitment appears on the same page as the Professional Engineer's certification at the beginning of the Plan.

4.2 Conformance with Requirements and Deviations [40 CFR 112.7(a)(1)-(2) and 112.6(b)(4)]:

The facility is committed to conform to the requirements of the Oil Pollution Prevention rules. Any deviations from the requirements will be carried out in accordance with the procedures described at 40 CFR §112.6(b)(4), §112.7(a)(2), and §112.7(d). 40 CFR §112.7(a)(2) allows deviations from certain requirements if the facility explains the reason for the deviation in the Plan and provides environmental protection equivalent to that which is called for in the rule. §112.7(d) identifies certain requirements from which deviations are allowed only if the facility has either a §112.20 Facility Response Plan (FRP), or a Part 109 Oil Spill Contingency Plan (OSCP), which is administered by local or regional authorities. 40 CFR §112.20 requires facilities with the potential to cause substantial harm to the environment because of an oil spill to develop and submit to EPA an FRP. The facility does not meet the criteria required for classification under the applicability of substantial harm criteria, per 40 CFR §112, therefore, the facility is not required to develop an FRP, and a local or regional OSCP has not been formed. Refer to the signed certification form contained in Appendix F.

The facility does not serve as an oil production or work-over facility (on or offshore). Therefore, the provisions of 40 CFR §112 relevant to these facilities are not applicable to this plan.

4.3 Description and Physical Layout of the Facility [40 CFR 112.7(a)(3) and 40 CFR 112.7(a)(3)(i)]:

The facility is located at 584 N. Fairview Avenue in St. Paul, Minnesota. It is used for distribution of industrial and food grade chemicals. The facility has one building onsite comprised of a warehouse, office space and training room, shipping and receiving bay, flammable room, and tank room. The hours of operation at this location are 7:00am to 3:30 pm. The facility is always manned during hours of operation.

Oil-containing products are stored and handled throughout the facility. The facility's total oil-storage capacity is approximately 10,120 gallons. The locations of bulk oil storage containers, drainage features, and other important site features are depicted in Figure 2 (Facility Diagram-Interior).

A facility location map (United States Geological Survey topographic map) is attached as Figure 1. A facility diagram of the interior of the building showing the location of oil storage areas and is attached as Figure 2. A facility diagram of the exterior of the facility showing drainage directions is attached as Figure 3.

4.4 Facility Oil Storage and Use [40 CFR 112.7(a)(3)(i)]

Facility oil storage container information is provided in Table 1, which includes detailed information about each of the oil containers at the facility, including volume, content, location, and secondary containment information. Oil storage areas are further described in the following paragraphs.

- A maximum of twenty-two 330-gallon totes of Soltrol isoparaffin solvent and eight 55-gallon steel drums of eucalyptus oil are stored in the Flammable Room. The floor drain is plugged, and the doorway has a spill barrier.
- A number of drums are stored in the Warehouse. There is a maximum of thirty-three 55-gallon drums, including: 8 steel drums of coconut oil, 2 steel drums of mineral oil, 5 drums of Anti-Foam (30%), 16 drums of Anti-Foam (10%), 1 drum of Anti-Foam (5%), and 2 drums of silicone oil. All drains within the warehouse are plugged and any spill will be contained by the building floor and walls. The Warehouse also holds two 275-gallon totes of mineral oil.

4.5 Discharge Prevention Measures [40 CFR 112.7(a)(3)(ii)]

This section describes spill prevention measures and procedures for routine handling of products at the facility.

Measures the facility takes to prevent discharges include the following:

a. Employees receive training in the prevention of spills, as well as control and countermeasure procedures. Employee training records are maintained in the company's training tracking system, Active Learner, or kept on file at the facility.

b. A periodic visual inspection is completed by a trained employee. Container Inspection records are included in the facility's monthly Safety and Security Checklist and kept on file at the facility.

c. Equipment is maintained in good condition to minimize the risk of an oil discharge due to equipment failure. A comprehensive preventative maintenance program is implemented at the facility.

4.6 Discharge/Drainage Controls [40 CFR 112.7(a)(3)(iii)]

This section describes discharge or drainage controls such as spill containment materials and secondary containment around containers and other structures, equipment, and procedures for the control of a discharge.

- No oil transfer occurs on the property.
- With the exception of the bathroom, all floor drains within the building are plugged. Any spillage will be contained by the floor and walls and can be addressed with a spill kit. Spill response equipment includes absorbents, shovels, and recovery drums.
- Significant spills outside containment areas are unlikely and will be contained in surface depressions and temporary dams will be used where necessary if there are larger spills.

4.7 Countermeasures for Discharge Discovery, Response and Cleanup [40 CFR 112.7(a)(3)(iv)]

Facility personnel are trained to readily identify spills and initiate appropriate countermeasures to prevent discharge of oil into receiving waters. In the event facility personnel are not able to handle the response and cleanup work for a spill, contractors are readily available to assist. The contacts and phone numbers for these contractors are contained in Appendix D.

As discussed in Section 4.5, further countermeasures for discharge discovery, response and cleanup exist at the facility. These include regular equipment inspections and facility lighting.

4.8 Methods of Disposal of Recovered Material [40 CFR 112.7(a)(3)(v)]

Discharged oil that is recovered through cleanup with absorbent material or secondary containment will be collected and properly disposed of according to applicable local and federal guidelines. Discharged oil that is contained and has no danger of reaching navigational waters will be recovered and disposed of as appropriate, by a hired contractor. Recycling is the priority option.

4.9 Contacts List and Phone Numbers [40 CFR 112.7(a)(3)(vi)]

Contacts and phone numbers for authorities and emergency personnel are required by §112.7(a)(3)(vi). This information is posted at the facility and is contained in Appendix D.

4.10 Discharge Discovery and Reporting Procedures [40 CFR 112.7(a)(4-5)]

Facility employees, upon discovery of a spill, have been instructed to follow the Spill Response and Reporting Procedures contained in Appendix C.

According to SPCC regulations, the EPA Regional Administrator must be informed if either 1) more than 1,000 gallons of oil are spilled into navigable waters in a single discharge event, or 2) more than 42 gallons of oil are spilled into navigable waters in each of two discharge events within any 12-month period. A report shall be submitted to the EPA Regional Administrator within 60 days of the triggering discharge event.

If external reporting is required, the following information is to be provided:

- location and phone number of the facility;
- date and time of the discharge;
- type of material discharged;
- estimates of the amount discharged;
- source of the discharge;
- affected media (e.g. water, soil);
- cause of the discharge;
- an estimation of damages or injuries;
- actions used to stop or mitigate the effects of the discharge;
- whether an evacuation may be needed; and,
- the names of individuals and/or organizations who have been contacted.

Notifications will be documented on the Significant Spill Report form (Appendix E) and retained with the SPCC Plan.

The state department of Emergency Response and the local POTW must be notified of any petroleum discharge which creates a visible sheen on a navigable surface water body or any discharge to a surface water which exceeds a quantity of 42 gallons.

4.11 Potential Spill Predictions of Direction, Rate of Flow, and Quantities [40 CFR 112.7(b)]

The facility's record of no reportable spill occurrences within the previous 5 years is considered an indication that a reasonable potential for equipment failure does not exist at the facility. Potential spill predictions for the facility are discussed below. Additional information is presented in Table 1.

- Drums or totes may be temporarily placed near the warehouse docks or outside the building. Drum or tote failure could result in oil traveling to the St. Paul storm drain system. The quantity released would be minimal to 330 gallons. The predicted spill rate of up to a few gallons per minute (gpm) can be controlled with temporary dams and spill kits.
- Failure of drums or totes within the building will be contained by the building walls and floor. The spill will flow toward the plugged floor drain and also has a predicted spill rate of up to a few gpm. A spill kit is available to manage potential spills.

Procedures for dealing with leaks are listed in Section 4.6.

4.12 General Containment/Diversion Controls [40 CFR 112.7(c)]

At a minimum, the facility is required to employ one of the containment/diversionary structures or equipment listed in §112.7(c) for each oil container shown in Table 1 to prevent discharges of oil into navigable waters. Table 1 lists general secondary containment provisions for all applicable oil storage containers.

4.13 Contingency Plan [40 CFR 112.7(d)]

The facility implements adequate secondary containment for the oil storage containers; therefore, an oil spill contingency plan is not required for this facility.

4.14 Facility Inspections, Tests, and Records [40 CFR 112.7(e)]

All inspection and testing records are to be filed with the SPCC Plan and are maintained in the office of the District Manager. All records will be maintained for at least three years. Informal daily visual inspections of equipment, tanks, piping, lines and other storage vessels located at the facility are inspected by employees to ensure there are no material damages or leakage of oils.

At least once monthly, the following minimum inspection procedures are completed and recorded:

- Visually inspect oil storage areas for signs of leaks.
- Inspect all oil-handling containers and associated equipment for signs of leaks.
- Inspect each container’s supports and foundations, where applicable.
- Inspect closures and valves for signs of leaks.
- Inspect all hoses and piping for signs of leaks.

The results of the inspections are signed by the inspector and maintained for a period of not less than three years. Completed inspection forms are maintained with the SPCC files. A Monthly Housekeeping/Oil Storage & Handling Procedure is presented in Appendix B.

Tank Testing and Inspections [40 CFR §112.8(c)(6)]

40 CFR §112.8(c)(6) states that aboveground containers must be tested or inspected for integrity on a regular schedule in accordance with industry standards. Examples of integrity testing include but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing or another system of non-destructive shell testing. The USEPA Oil Program SPCC Guidance for Regional Inspectors [1] clarifies that use of visual inspections in lieu of a separate testing technique can be a "determination of environmental equivalence", but is subject to good engineering practice, including consideration of industry standards.

In accordance with USEPA guidance provided on integrity testing and best industry practices periodic visual inspections are considered a sufficient integrity testing program for totes and drums.

In addition, for aboveground containers that are greater than 5,000 gallons and less than 75,001 gallons in capacity a formal integrity inspection/test should be conducted at minimum 20-year intervals since date of installation (provided all sides are visible, have no contact with ground surfaces, spill control and overfill spill protections are in place) according to STI SP001 guidance. There are no tanks at the facility that will need the formal integrity inspection/tests.

4.15 Personnel Training and Discharge Prevention Procedures [40 CFR 112.7(f)]

The District Manager for the facility is responsible for implementing spill prevention and control measures, as well as amending this SPCC Plan when necessary. In the event of a spill, facility personnel are instructed to inform the District Manager. The District Manager will implement the spill control procedures.

All employees whose work is related to oil handling are required to have annual training in the proper operation of their equipment for the prevention of oil discharge. This training highlights any past spill events or failures and recently developed precautionary measures; applicable pollution control laws, rules, and regulations; general facility operations including operation and maintenance of equipment; and, contents of the facility SPCC Plan. Employee training information is documented on the Employee Training form. Completed forms are maintained at the facility and training records also maintained in Active Learner software program.

Employees have been instructed to report any leaks or discharges to their appropriate supervisors. Supervisors and management personnel are aware of discharge reporting procedures.

4.16 Facility Security [40 CFR 112.7(g)]

Fencing and Gates

The property is surrounded by a chain link fence, with two gates. The facility is kept locked at the end of each business day. There are video surveillance cameras filming the facility and its grounds.

Flow valves

Drums and tanks are not filled or emptied on site.

Facility lighting

Adequate lighting is provided for outside activities during hours of darkness. Lighting is adequate to detect spills during hours of darkness and to prevent vandalism.

Starter Controls

Start/stop controls are not applicable to the facility as there are no oil pumping operations.

4.17 Facility Loading/Unloading [40 CFR 112.7(h)]

Consistent with EPA's clarification provided in the EPA Oil Program's SPCC Guidance for Regional Inspectors [1] and EPA's revision to the Loading/unloading Rack definition [2], the unloading/loading of gasoline, oil, and diesel is not considered a "loading/unloading rack"; therefore, the loading/unloading rack requirements specified in 40 CFR §112.7(h) do not apply.

Facility loading/unloading requirements are not applicable to the facility as there are no bulk fuel transfer operations.

4.18 Brittle Fracture Evaluation [40 CFR 112.7(i)]

There are no field constructed tanks located at the facility; therefore, the brittle fracture evaluation is not required under this section.

4.19 Conformance with State Requirements [40 CFR 112.7(j)]

The facility will conform to all applicable state requirements for oil storage. State spill reporting requirements are discussed in Section 4.10.

5.0 SPCC REQUIREMENTS FOR ONSHORE FACILITIES [40 CFR 112.8]

Subpart B, Section 112.8 outlines specific requirements that apply to petroleum and non-petroleum oils. The facility's conformance with these requirements is discussed below.

5.1 Facility Drainage [40 CFR 112.8(b)]

Drainage from diked secondary containment areas [40 CFR §112.8(b)(1)-(2]: The Flammable Room has a spill barrier in the doorway and is otherwise contained by the floor and walls. Drainage in the Flammable Room is directed toward the plugged floor drain. If a spill occurs within the room, released product will be managed with a spill kit unless otherwise unmanageable.

Facility Drainage Systems [§112.8(b)(3)-(5) and §112.12(b)(3)-(5)]: Oil products are stored exclusively at the interior of the facility. Floor surfaces are sloped to drains which are located throughout the facility. All drains except for those in the bathrooms are plugged.

5.2 Bulk Storage Containers [40 CFR 112.8(c)]

Bulk storage containers are those containers, usually tanks, whose primary purpose is storage of oil. Containers whose purpose is to hold oil that is being used, e.g., electrical transformers, gearboxes, hydraulic unit reservoirs and machining coolant systems, are not considered bulk storage containers. The rule lists eleven specific requirements that apply to bulk storage containers. Each applicable type is discussed below.

(1) All containers used to store oil within the facility are constructed from materials compatible with the material stored in the container and the conditions of storage, such as pressure and temperature.

(2) All oil storage containers are located within the facility and contained by the building walls and floor, which provides sufficient secondary containment.

(3) Oil storage areas are located indoors so accumulation of precipitation is not expected.

(4, 5) The Facility has no underground or partially buried oil storage tanks.

(6) Bulk storage containers are inspected monthly and the facility has daily walk through spill inspections. See **Section 4.14** for additional testing and inspection information.

(7) The facility does not utilize heating coils at the facility.

(8) There are no bulk storage oil tanks (field-erected or shop-built) within the facility.

(9) The facility produces no effluent.

(10) In the event an oil leak is identified from a container the leak will be corrected promptly. Measures will be taken to contain and remove any released oil until repairs are completed.

(11) Mobile and portable oil storage containers are stored within the facility. Drums and totes are positioned so as to prevent oil from reaching navigable waters in the event of a spill from the container. Containment is provided by the building floor and walls.

5.3 Facility Transfer Operations, Pumping, and Facility Process [40 CFR 112.8(d)]

No oil transfer operations or pumping/facility processes occur at the facility.

5.4 Facility Response Plans (40 CFR 112.20)

40 CFR §112.20 requires facilities with the potential to cause substantial harm to the environment as a result of an oil spill to develop and submit to EPA a Facility Response Plan. The facility does not meet the criteria required for classification under the applicability of substantial harm criteria, per 40 CFR §112; therefore, the provisions of 40 CFR §112 relevant to a Facility Response Plan are not applicable to this plan. Appendix F contains the Certification of the Applicability of the Substantial Harm Criteria as well as the prescribed certification statement. As indicated by the responses in the Certification, the facility is not required to prepare and submit a Facility Response Plan.

[2] USEPA Oil Program - SPCC Guidance for Regional Inspectors, Dec. 2013
[1] 73 Federal Register, No. 235, 74248 (December 5, 2008)

TABLES

TABLE 1. OIL CONTAINERS/EQUIPMENT CONTAINING 55 GALLONS OR GREATER

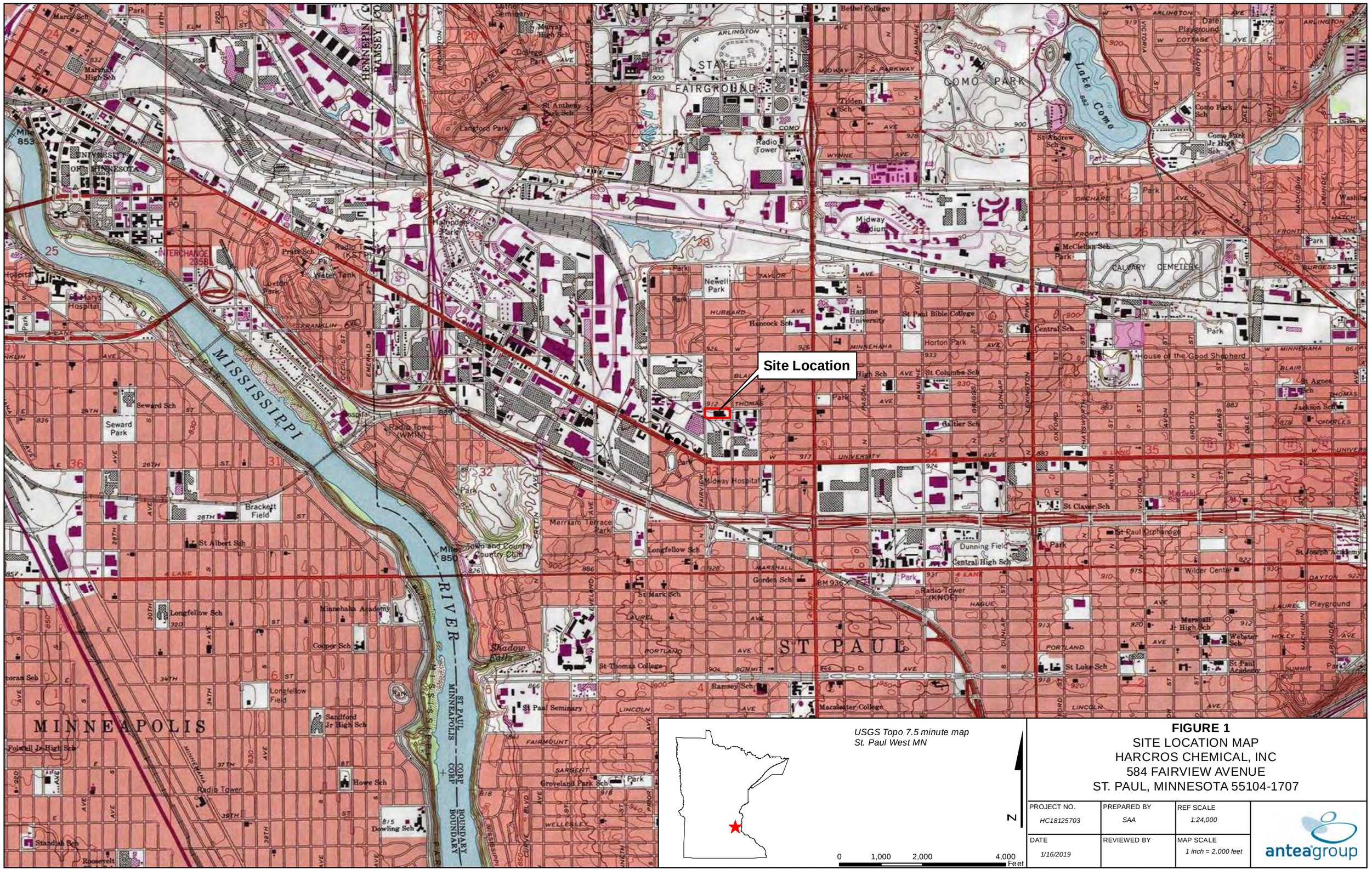
Table 1

Oil Containers/Equipment Containing 55 Gallons or Greater

Container Location[1]	Container	Contents	Container Capacity, gallons[2]	Dedicated Secondary Containment? [3]	Dedicated Secondary Containment Volume, gallons	Other General Containment System(s)[4] (Required unless dedicated containment provided)	Direction of flow from container[5] (process sewer or stormwater drainage)
Flammable Room	Totes (22)	Soltrol isoparaffin solvent	330 each (7,260)	Yes	~2,020	Contained to Flammable room	Toward plugged floor drain
	Steel Drums (8)	Eucalyptus Oil	55 each (440)	Yes	~2,020		Toward plugged floor drain
Warehouse	Totes (2)	Mineral Oil	275 each (550)	No	~12,480	Warehouse interior, floor drains are closed	Toward plugged floor drain
	Steel Drums (8)	Coconut Oil	55 each (440)	No	~12,480		Toward plugged floor drain
	Steel Drums (2)	Mineral Oil	55 each (110)	No	~12,480		Toward plugged floor drain
	Drums (5)	Anti-Foam (30%)	55 each (275)	No	~12,480		Toward plugged floor drain
	Drums (16)	Anti-Foam (10%)	55 each (880)	No	~12,480		Toward plugged floor drain
	Drum	Anti-Foam (5%)	55	No	~12,480		Toward plugged floor drain
	Drums (2)	Silicone Oil	55 each (110)	No	~12,480		Toward plugged floor drain

[1] Locations are shown on site map using container name [2] Rate of flow that results from any type of failure (overflow, rupture, or leakage) assumed to be the container capacity released over a one-hour period. EPA uses this approach in its guidance documents. [3] Mandatory for bulk storage containers and assumes 10% displacement from totes, drums, and other items in the area of containment. Other types of containers must have either dedicated secondary containment or one of the other means of general containment from options listed at 112.7(c). [4] General Containment Systems from 112.7(c): (i) Dikes, berms, retaining walls, (ii) curbing or drip pans, (iii) sumps and collection systems, (iv) culverting, gutters, or other drainage systems, (v) weirs, booms, or other barriers (vi) spill diversion ponds, (vii) retention ponds, or (vii) sorbent materials. [5] Occurs only if dedicated secondary containment fails or is bypassed.

FIGURES



USGS Topo 7.5 minute map
St. Paul West MN

N

0 1,000 2,000 4,000 Feet

FIGURE 1
SITE LOCATION MAP
HARCROS CHEMICAL, INC
584 FAIRVIEW AVENUE
ST. PAUL, MINNESOTA 55104-1707

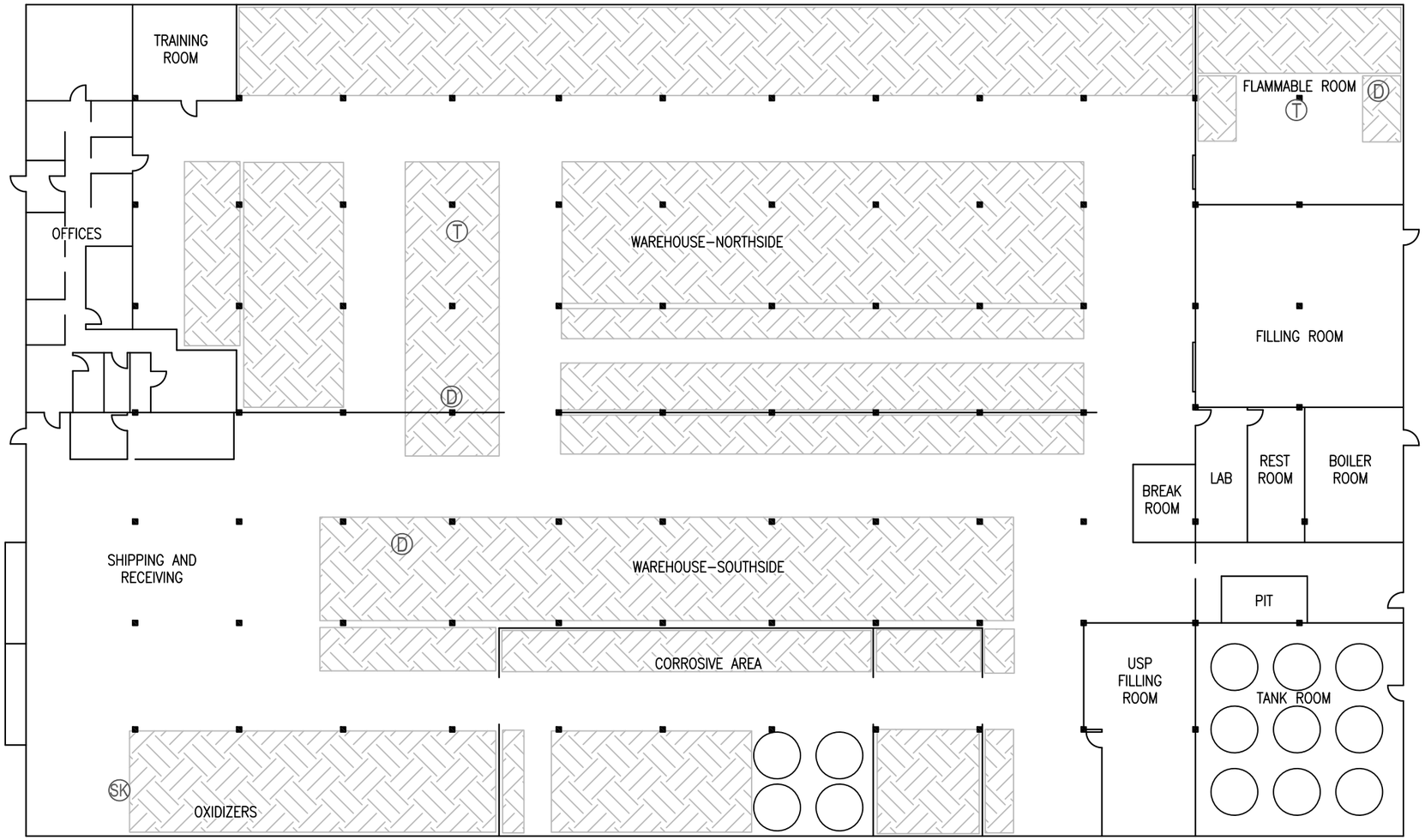
PROJECT NO.	PREPARED BY	REF SCALE	anteagroup
HC18125703	*SAA*	*1:24,000*	
DATE	REVIEWED BY	MAP SCALE	
1/16/2019		*1 inch = 2,000 feet*	

LEGEND

Ⓓ DRUM STORAGE

Ⓣ TOTE STORAGE

SK SPILL KIT



Container	Container Capacity (gallons)
FLAMMABLE ROOM	
Totes – 22 (Sotrol Isoparaffin Solvent)	330 each (7,260)
Drums-8 (Eucalyptus Oil)	55 each (440)
WAREHOUSE	
Totes – 2 (Mineral Oil)	275 each (550)
Drums – 8 (Coconut Oil)	55 each (440)
Drums – 2 (Mineral Oil)	55 each (110)
Drums – 5 (Anti-Foam, 30%)	55 each (275)
Drums – 16 (Anti-Foam, 10%)	55 each (880)
Drum (Anti-Foam, 5%)	55
Drums – 2 (Silicone Oil)	55 each (110)

North

0 25

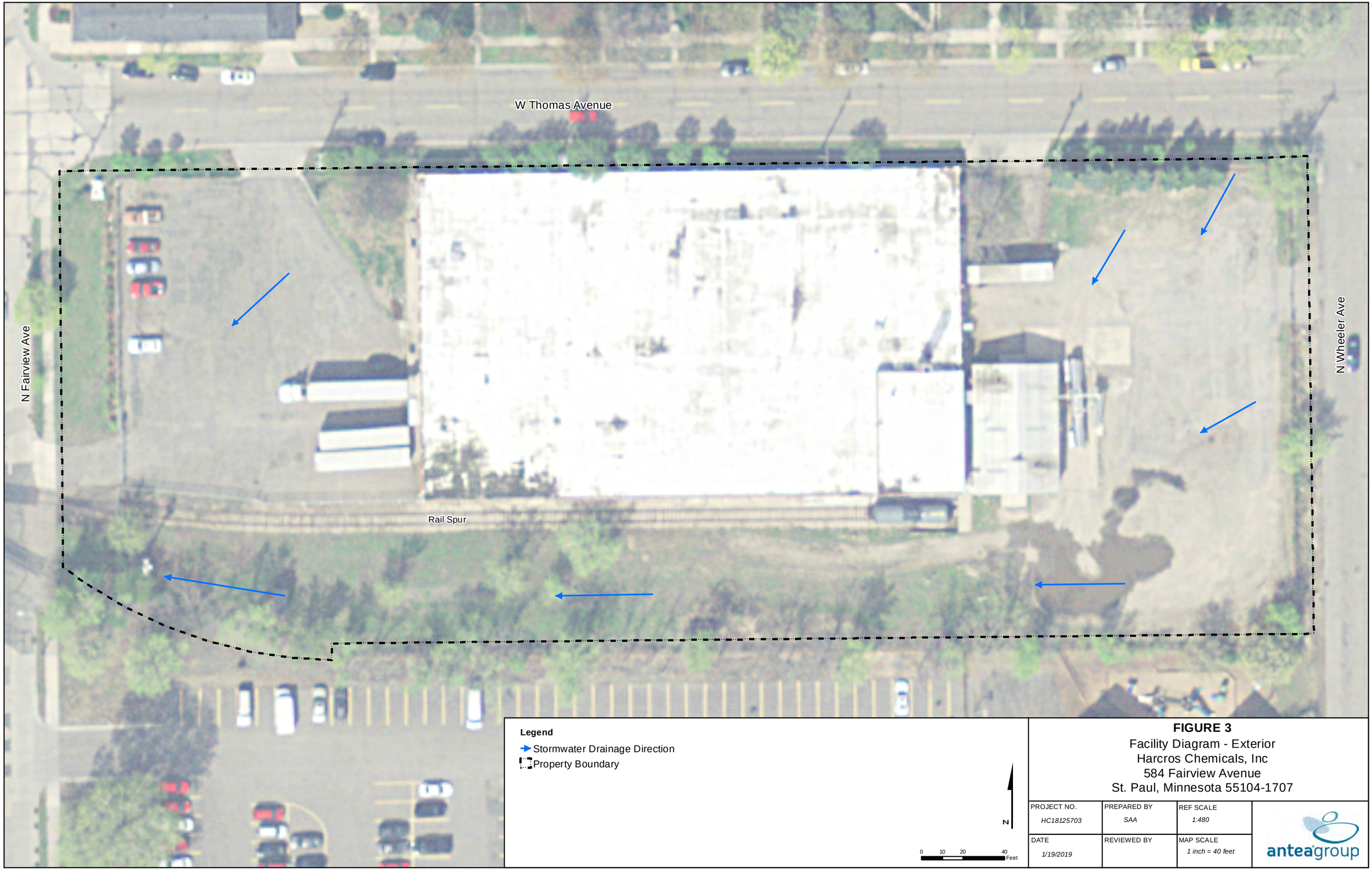
SCALE IN FEET

FIGURE 2

FACILITY DIAGRAM – INTERIOR
HARCROS CHEMICALS, INC.
584 FAIRVIEW AVENUE NORTH
SAINT PAUL, MINNESOTA 55104–1707

PROJECT NO.	PREPARED BY	DRAWN BY
HC18125703	GT	DR/DD/SAA
DATE	REVIEWED BY	FILE NAME
1/25/2019		A09303713–bldg

anteagroup



Legend

- Stormwater Drainage Direction
- Property Boundary

N

0 10 20 40 Feet

FIGURE 3

Facility Diagram - Exterior
Harcros Chemicals, Inc
584 Fairview Avenue
St. Paul, Minnesota 55104-1707

PROJECT NO.	PREPARED BY	REF SCALE	
HC18125703	*SAA*	*1:480*	anteagroup
DATE	REVIEWED BY	MAP SCALE	
1/19/2019		*1 inch = 40 feet*	

APPENDIX A

EMPLOYEE TRAINING RECORDS

EMPLOYEE TRAINING RECORDS

(Attendance Form)

Learning Objectives:

1. Understand why this training is important.
2. Have a general awareness of our facility's SPCC.
3. Understand your roles and responsibilities as defined in the SPCC Plan.

Trainer: _____ Signature: _____

Location: _____ Date: _____

Time (a.m./p.m.) and Duration (hours): _____

Participants:

Name (Print)	**Signature**

APPENDIX B

PREVENTATIVE MAINTENANCE AND INSPECTION RECORDS

PREVENTATIVE MAINTENANCE AND INSPECTION RECORDS

Oil Storage Inspection Procedure

Storage areas for oil must document periodic visual inspections. These inspections are conducted under direction of the District Manager. The inspection log is completed, signed and filed with the SPCC Plan. If a deficiency is found, a work order is issued to the maintenance or department supervisor to correct the problem.

The following procedures should be used as guidelines when performing the monthly inspections:

(1) Refer to the Tank Inspection Forms for storage area identification and location. Visually observe tanks, level sensors, pumps, fill ports, pipes, valves, supports/foundations, and secondary containment structures. Indicate leaks, seepage, accumulated liquid, cracks, corrosion or other signs of deterioration.

(2) Visually observe containers. Indicate leaks, missing bungs, swelling, staining or other signs of deterioration. Indicate missing or unreadable labels.

(3) Inspect spill response equipment. Determine that the oil absorbent material inventory has all necessary equipment and all equipment is in good condition. Document if equipment is in need of replacement or repair. Indicate need for follow-up if equipment needs to be replaced.

(4) Record changes in storage locations and the establishment of new storage areas as observed.

(5) Indicate if follow-up actions are required and when the necessary actions have been performed.

OIL STORAGE INSPECTION RECORDS

Monthly Safety and Security Checklist

APPENDIX C

SPILL RESPONSE PROCEDURES AND REPORTING REQUIREMENTS

SPILL RESPONSE PROCEDURES

An employee who discovers an oil spill, hazardous spill, or a toxic gas release shall:

1. Take the necessary steps to prevent injury to personnel, damage to equipment, and avoid fire hazard.

2. Take immediate steps to contain the spill or release and prevent runoff from flowing into a sanitary or storm sewer (i.e., plug drains or cover drains). If steps cannot be taken to eliminate the immediate hazard, the employee must proceed to step 4.

3. Immediately notify the facility's District Manager and Company's Spill Hotline, which investigate and report the spill or release:

   Primary Contact: Craig Mader (Home: 651-260-0896 Cell: 651-295-1895)

   Company's Spill Hotline (PIER): 877-743-7669

4. If none of the above personnel can be reached, the person(s) must immediately report the incident, as necessary, to the parties listed on the Spill Reporting Requirements table and/or on the Contact List contained in Appendix D.

5. When reporting the spill/release, have the following information:
   - Time (approximate) of spill/release
   - Location and Equipment involved
   - Type of material spilled/released (i.e., listed Extremely Hazardous Substance (EHS) under SARA)
   - Estimated amount of spill/release
   - Estimated amount that reached the sewer, land, air, or water
   - Steps taken to contain the spill/release
   - Potential danger to life and/or environment; whether evacuation has taken place
   - Name and phone number of facility contact person

6. Log the name/title/time of each person and agency contacted on the Significant Spill Report form.

7. The District Manager or their representative will maintain a log of spill incidents.

Spill Reporting Requirements

Regulatory Agency	Reporting Requirements
National Response Center Washington D.C. 800-424-8802	Any quantity spill which causes the following: • violation of applicable water quality standards • film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines • sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines Exemptions: • spills from properly functioning vessel engines • spills permitted for research and development • spills permitted by a NPDES permit
Minnesota Duty Officer Emergency Response/Spill Reporting (24-hour emergency response) 651-649-5451	• any petroleum discharge which creates a visible sheen on a navigable surface water body • any petroleum discharge to a navigable surface water body which exceeds a quantity of 42 gallons
City Public Works Department 651-266-6100	Report any spill that enters the sanitary sewer system
Police Department Non-Emergency: 651-291-1111 Emergency: 911	Report any spill that could migrate offsite or pose a threat to human health or welfare.

APPENDIX D

CONTACT LIST AND TELEPHONE NUMBERS

CONTACT LIST AND TELEPHONE NUMBERS
Harcros Chemicals Inc.
584 N Fairview Avenue
St. Paul, Minnesota

Contact	Phone Number(s)
District Manager: Craig Mader	650-260-0896 (Home) 651-295-1895 (Mobile)
Company's Spill Hotline (PIER):	877-743-7669
Corporate Environmental: Kevin Roepe	660-909-4947 (Mobile)
National Response Center	800-424-8802 or 800-562-8700
Minnesota Duty Officer	651-649-5451
City Public Works Department	651-266-6100
CHEMTREC (for non-Harcros transportation equipment)	800-424-9300
Fire Department – NON-EMERGENCY	651-224-7371
Police Department – NON-EMERGENCY	651-291-1111
Fire, Police, Ambulance – EMERGENCY	911

APPENDIX E

SIGNIFICANT SPILL REPORT

SIGNIFICANT SPILL REPORT

Facility Name: _____

Date/Time of Discharge: _____

Discovered By: _____

Report prepared by: _____

Location: _____

_____

_____

Material Type & Volume: _____

_____

Cause of Spill: _____

_____

_____

_____

_____

Corrective Action Taken: _____

_____

_____

_____

_____

_____

_____

Agencies/Persons Contacted: _____

_____

APPENDIX F

CERTIFICATION STATEMENT OF THE NON-APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

Certification of the Applicability of the Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes _____ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes _____ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife sensitive environments?
   Yes _____ No X

4. Does the facility have a storage capacity greater than or equal to 1 million gallons, and if so, is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
   Yes _____ No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons, and if so, has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the past 5 years?
   Yes _____ No X

Certification

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

_____

Signature

Craig Mader District Manager

_____

Date