EPA REGION 6 Enforcement Division
INSPECTION REPORT

Inspection Entry Date/Time	05/06/2024 09:00 AM (CT)	Announced: No
Inspection Exit Date/Time	05/06/2024 11:45 AM (CT)	Access: Granted
Regulatory Program	RCRA	
Type of Inspection	Focused Compliance Inspection (FCI)	
Facility or Site Name	Nature Environmental and Marine Services, LLC (Nature Environmental)	
Facility/Site Identifier	TXR000084819	
Facility/Site Physical Address	18511 Beaumont Hwy	
City, State, Zip Code	Houston, TX 77049	
County/Borough	Harris	
Generator Status	Very Small Quantity Generator (VSQG)	
NAICS	423930, 484110, 484230	
Type of Operation	Nature Environmental receives domestic and foreign trash and liquid wastes. Most of their operation involves separating used oil from solids and water.	
Geographic Coordinates	29.87449, -95.106947	

Additional Persons Participating in Inspection:

Name	Title	Organization	Email	Phone
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
John Penland	Inspector	EPA REGION 6	Penland.John@epa.gov	(214) 665-9717
Anshul Paripati	Contractor	Eastern Research Group (ERG)	Anshul.Paripati@erg.com	(571) 535-1503

Lead Inspector:

Cameron Tanaka	Cameron Tanaka Digitally signed by Cameron Tanaka Date: 2024.07.25 23:35:57 -04'00'		07/25/2024
	ERG	Cameron.Tanaka@erg.com	(703) 633-1632 ext. 11632

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Focused Compliance Inspection (FCI)

The Port of Houston and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or have an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including photographs taken (see Appendix 1), verbal or written statements made during or after the on-site inspection, and/or materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contractor/ERG	Cameron Tanaka	(703) 633-1632 ext. 11632	Cameron.Tanaka@erg.com	N/A	N/A
RCRA Inspector/ Contractor/ERG	Anshul Paripati	(571) 535-1503	Anshul.Paripati@erg.com	N/A	N/A
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	N/A	N/A
Inspector/Enforcement Officer/EPA Region 6	John Penland	(214) 665-9717	Penland.John@epa.gov	N/A	N/A

Facility General Description

Tenant/Area	Inspection Date	Process Description	Area of Concern
Nature Environmental and Marine Services, LLC	05/06/24	Nature Environmental and Marine Services, LLC (Nature Environmental) receives waste streams in the form of domestic and foreign trash and liquid waste. The liquid wastes include wash water and used oil from ships. Nature Environmental also receives various universal wastes but does not accept hazardous waste. Everything the facility receives is sampled before being unloaded off ships and transported to its site. Most of Nature Environmental's operations involves separating used oil from solids and water in frac tanks and recycling the separated materials. Oily water is sent off to wastewater treatment plants. The facility does not maintain a MARPOL COA.	Yes

SECTION II – OBSERVATIONS

Tenant: Nature Environmental and Marine Services, LLC			
Section: 2.1	**Date:** 05/06/24, 9:00 AM	**Contains AOC:** Yes	**Contains CBI:** No
Lead Inspector: Cameron Tanaka	**Attendees:** Vivian Irlas Jr. (General Manager) and Alejandro Escobar (Dispatcher)		

Nature Environmental receives waste streams in the form of domestic and foreign trash and liquid waste. Domestic trash is generally sent to dumpsters and landfills while foreign trash is sent to an autoclave system in Corpus Christi to be steam sterilized. The liquid wastes include wash water and used oil from ships. The facility does not accept any hazardous waste. Most of its operation involves physically separating used oil from solids and water in frac tanks and recycling the separated materials. Nature Environmental essentially decants used oil by transferring the materials between frac tanks to get the lowest Basic Sediment & Water (BS&W) percentage possible in the final waste oil tank. The used oil that is separated out during this process is generally sold to refineries. A lower BS&W percentage means there is a higher oil content in the used oil, resulting in Nature Environmental receiving higher pay for the recycled material from companies such as Select Oil and Interstate. These companies re-refine the recycled used oil and receive about 10,000 gallons of the material per week from Nature Environmental. The oily water from this process is sent off to wastewater treatment plants for disposal and the solids remain in the frac tanks to be mixed with more water. This is done to pull out more oily content from the solids or sediments. The facility holds wastewater in three poly tanks. These are sent to a wastewater treatment plant (WWTP). If the wastewater is too acidic, the facility will add base, or vice versa, to meet the specifications of the WWTP. For foreign trash, the material is sealed in supersacks. These wastes will stay on-site for a day at most before they are sent to Corpus Christi for steam sterilization. Nature Environmental also removes and stores old printers and universal wastes from ships, such as fluorescent lamps. These wastes generally stay on-site for two weeks. Nature Environmental also stores paint waste which is sent for disposal within a day after being received on site. The facility also operates a parts washer. The solvent and spent solvent for this equipment is handled by Safety Kleen, a third-party vendor. A third party also performs any maintenance generating used oil for Nature Environmental. The facility also stated that they generate and transfer used oil.

Nature Environmental is registered as a transporter, a used oil handler, and a VSQG of hazardous waste with EPA ID TXR000084819. Although it has not registered with the State of Texas or EPA as a used oil processor, Nature Environmental is acting in that capacity when it processes used oil [***AOC #1*** *– Nature Environmental did not notify as a used oil processor - 40 CFR 279.51, TAC 324.12(2)*]. The company transports waste from docks in Houston, primarily City Docks, and occasionally Galveston docks among others. Nature Environmental services vessels and docks exclusively by road using its own fleet of vacuum trucks. Everything Nature Environmental receives is sampled before being unloaded off ships and transported to its facility. The facility uses A&B Lab, Precision Labs, or its own in-house sampling. Nature Environmental generally perform solids and water testing, pH testing, and viscosity testing for any materials received. Occasionally the facility receives waste that does not match the description provided by the customer prior to pick up. Nature Environmental personnel stated that even in those cases, they have never received hazardous waste. Used oil is stored in various storage tanks during the physical separation process, generally for a total of 10 days. They send their processed used oil off on Bills of Lading (BOLs). The inspection team viewed several (BOLs) and noted no issues. Nature Environmental does not have a MARPOL COA.

The inspection team then conducted a visual inspection of the facility. Observations and Areas of Concern (AOCs) are organized by section below along with facility responses where relevant.

Universal Waste Area

The inspection team noted that many of the facility's universal wastes did not have universal waste labelling (see Appendix 1 – Photo 1) [***AOC #2*** – *Nature Environmental did not label or mark the universal waste to identify the type of universal waste - 40 CFR 273.14*]. On May 17, 2024, Nona Walker followed up on this issue via email , stating that the walls of the universal waste area had been labeled (see Appendix 2 and Appendix 3 – Photos 2 and 3). Also, some universal waste lamp boxes were open (see Appendix 1 – Photo 2) [***AOC #3*** – *Nature Environmental did not keep containers holding universal waste lamps closed. - 40 CFR 273.13(d)(1)*].

Used Oil Storage Area (see Appendix 1 – Photos 3 and 7)

In Nature Environmental's pre-processing used oil storage area, the inspection team noted that multiple containers full of used oil were in rusted or in poor condition (see Appendix 1 – Photos 3, 4, and 7) [***AOC #4*** – *Nature Environmental was storing used oil in containers that were rusted and/or in poor condition - 40 CFR 279.45(c)(1)*]. Free liquid was also observed in an oil contaminated solid waste container adjacent to this area (see Appendix 1 – Photos 8 and 9). In her May 17 follow-up email, Ms. Walker indicated that the free liquid had been sucked out of the used oil dumpster (see Appendix 2).

Chemical Storage Area 1

Adjacent to Nature Environmental's used oil storage area and across from the oil contaminated solid waste container, the inspection team viewed a tote and three drums in the facility's chemical storage area 1 (see Appendix 1 – Photos 5 and 6). According to facility representatives, the tote contained cooking oil. They could not identify the contents of the three drums during the inspection. In her May 17 follow-up email, Ms. Walker indicated that the drums contained cooking grease/oil which had been emptied into the cooking oil tote (see Appendix 2).

Oil Waste Separation Frac Tank Area

The inspection team observed about 21 frac tanks used for the facility's used oil separation process. The inspection team viewed Nature Environmental's final storage area for processed oil (see Appendix 1 – Photo 10). In this area, the facility had a white frac tank that did not have a label describing its contents (see Appendix 1 – Photo 11). The tank was not empty, but it did not have a visible gauge to help determine how full it was. The facility representatives believed that the frac tank only contained used oil [***AOC #5*** – *Nature Environmental did not label aboveground tanks used to store used oil - 40 CFR 279.54(f)(1)*]. The inspection team also observed six unlabeled white frac tanks for used oil storage in the oil waste separation frac tank area (see Appendix 1 – Photos 12 and 13) [see ***AOC #5***]. These frac tanks were all either full or mostly full. Pictures of two of these white frac tanks with appropriate used oil labels were included in Ms. Walker's May 17 follow-up email (see Appendix 2 and Appendix 3 – Photos 4 and 7). The team also observed that the secondary containment for the six unlabeled white frac tanks had been folded over for an unknown amount of time, making the system incapable of preventing a release of used oil into the environment (see Appendix 1 – Photos 14). [***AOC #6*** – *Nature Environmental's used oil aboveground tank secondary containment system was not sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out of the system to the soil, groundwater, or surface water - 40 CFR 279.54(c)(2)*]. In her May 17 follow-up email, Ms. Walker explained that the secondary containment wall had been fixed (see Appendix 2 and Appendix 3 – Photos 5 and 6). The inspection team observed the heavier solids frac tank storage area (see Appendix 1 – Photos 15). A tote without a label containing a bluish green material was viewed in this area (see Appendix 1 – Photos 16). Facility personnel could not identify the contents of this tote during the inspection. In her May 17 follow-up email, Ms. Walker stated that the bluish green liquid was detergent/soap and that the tote had been properly labeled (see Appendix 2 and Appendix 3 – Photos 1).

The inspection team concluded the visual inspection and began a document review process and closeout at

11:26 AM. The inspection team noted that Nature Environmental's Spill Prevention, Control, and Countermeasure (SPCC) plan was not up to date as it indicated there were only ten frac tanks on site rather than the 21 that the inspection team observed [***AOC #7*** *– Nature Environmental's SPCC plan, which has been amended to cover used oil requirements according to their Contingency Plan, was not reviewed and immediately amended to reflect the facility's changes - 40 CFR 279.52(b)(4)(iii)*]. Also, Nature Environmental personnel could not locate a physical copy of their Contingency Plan during the inspection [***AOC #8*** *– Nature Environmental did not maintain a copy of their contingency plan at the facility - 279.52(b)(3)(i)*]. During the closeout conference, the inspection team requested the following documents and clarifications:

- Manifests (if available) for any RCRA totes or material that have been sent off or handled within the last 3 years. The inspection team noted that one of Nature Environmental's non-hazardous waste manifests included a space for "RCRA totes" and requested clarification on what type of material that would be and how it is handled.
- A copy of the current SPCC plan
- A copy of the current Contingency Plan
- A copy of the current Used Oil Handler Analysis Plan
- Records of analyses performed for used oil for April 2024

In Ms. Walker's May 17 follow-up email (see Appendix 2), she responded to these requests in order as follows:

- Ms. Walker explained that Nature Environmental has not sent any RCRA totes or material offsite to date and has removed that wording from its non-hazardous waste manifest (see Appendix 2).
- The current SPCC plan is included as Appendix 4. Ms. Walker explained that the SPCC plan was updated to include all the frac tanks on site (see Appendix 2).
- The current Contingency Plan is included as Appendix 5. In section (b)(3)(i) of this plan, it is indicated that a "copy of the General Facility Standards plan and the SPCC Plan with contingency information is located in the operations supervisor office." Ms. Walker explained that the facility has placed a copy of the Contingency Plan in its SPCC binder (see Appendix 2).
- The current Used Oil Handler Analysis Plan is included as Appendix 6. No issues were noted in this plan.
- Records of analyses performed for used oil in April 2024 are included as Appendix 7. No issues were noted in these records.

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection.

SECTION IV – APPARENT AREAS OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Tenant: Nature Environmental and Marine Services, LLC		
AOC #1 – Nature Environmental did not notify as a used oil processor.	**Citation:** 40 CFR 279.51, TAC 324.12(2)	Section: 2.1
AOC #2 – Nature Environmental did not label or mark the universal waste to identify the type of universal waste.	**Citation:** 40 CFR 273.14	Section: 2.1
AOC #3 – Nature Environmental did not keep containers holding universal waste lamps closed.	**Citation:** 40 CFR 273.13(d)(1)	Section: 2.1
AOC #4 – Nature Environmental was storing used oil in containers that were rusted and/or in poor condition.	**Citation:** 40 CFR 279.22(b)(1)	Section: 2.1
AOC #5 – Nature Environmental did not label aboveground tanks used to store used oil.	**Citation:** 40 CFR 279.45(g)(1)	Section: 2.1
AOC #6 – Nature Environmental's used oil aboveground tank secondary containment system was not sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out of the system to the soil, groundwater, or surface water.	**Citation:** 40 CFR 279.45(e)(2)	Section: 2.1
AOC #7 – Nature Environmental's SPCC plan, which has been amended to cover used oil requirements according to their Contingency Plan, was not reviewed and immediately amended to reflect the facility's changes.	**Citation:** 40 CFR 279.52(b)(4)(iii)	Section: 2.1
AOC #8 – Nature Environmental did not maintain a copy of their contingency plan at the facility.	**Citation:** 279.52(b)(3)(i)]	Section: 2.1

SECTION V – FOLLOW UP

Follow-Up

Any facility follow-up items are as discussed in each facility's observations in Section II. Documents or files provided by the facilities were transmitted via email and included responses to AOCs or provision of documents requested.

Communication Log

During and after the inspection, additional information was emailed to EPA including:

1. 05/17/24 Nature Environmental email – Nona Walker sent an email providing clarifications on observations noted during the inspection, photographs and explanations of corrective actions implemented, and documents requested during the inspection.

SECTION VI – LIST OF APPENDICES

Appendix 1. Photograph Log

Appendix 2. Follow-Up Email from Nature Environmental

Appendix 3. Follow-Up Photographs from Nature Environmental

Appendix 4. Nature Environmental SPCC Plan

Appendix 5. Nature Environmental Contingency Plan

Appendix 6. Nature Environmental Oil Handler Analysis Plan

Appendix 7. Nature Environmental Oil Testing from April 2024

APPENDIX 1.
PHOTOGRAPH LOG

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04132
Date of Photo: 05.06.2024
Time of Photo: 10:16 hrs
Photographer: Anshul Paripati
Description: View of general waste area which includes the Universal Waste Area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04134
Date of Photo: 05.06.2024
Time of Photo: 10:16 hrs
Photographer: Anshul Paripati
Description: View of open fluorescent lamp boxes in general waste area (photo 1).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04135
Date of Photo: 05.06.2024
Time of Photo: 10:21 hrs
Photographer: Anshul Paripati
Description: View of used oil storage area before processing begins.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04136
Date of Photo: 05.06.2024
Time of Photo: 10:21 hrs
Photographer: Anshul Paripati
Description: View of severely rusted drum in oil storage area (photo 3). Inspector Penland stated the drum should be in overpack given the condition.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04137
Date of Photo: 05.06.2024
Time of Photo: 10:30 hrs
Photographer: Anshul Paripati
Description: View of tote and three drums in chemical storage area 1, located adjacent to the used oil storage area. The tote contains cooking oil; however, the facility representatives were unsure about the three drums.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04138
Date of Photo: 05.06.2024
Time of Photo: 10:30 hrs
Photographer: Anshul Paripati
Description: Close up view of drums with no labels and with unknown liquids. The inspection team requested clarification on the contents of these drums in the follow-up email.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04139
Date of Photo: 05.06.2024
Time of Photo: 10:31 hrs
Photographer: Anshul Paripati
Description: Wide view of used oil storage area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04140
Date of Photo: 05.06.2024
Time of Photo: 10:40 hrs
Photographer: Anshul Paripati
Description: View of used oil contaminated garbage container. Located adjacent to the used oil storage area, across from chemical storage area 1.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04141
Date of Photo: 05.06.2024
Time of Photo: 10:40 hrs
Photographer: Anshul Paripati
Description: View of free liquid in oil contaminated garbage container (photo 9).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04142
Date of Photo: 05.06.2024
Time of Photo: 10:45 hrs
Photographer: Anshul Paripati
Description: View of final storage area of processed oil in the oil waste separation frac tank area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04143
Date of Photo: 05.06.2024
Time of Photo: 10:45 hrs
Photographer: Anshul Paripati
Description: View of white storage frac tank from photo 10 that did not have a label describing contents in the oil waste separation frac tank area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04144
Date of Photo: 05.06.2024
Time of Photo: 11:07 hrs
Photographer: Anshul Paripati
Description: View of six unlabeled white frac tanks for used oil storage in the oil waste separation frac tank area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04145
Date of Photo: 05.06.2024
Time of Photo: 11:07 hrs
Photographer: Anshul Paripati
Description: Close up view of one of the six white frac tanks without labels (photo 12) in the oil waste separation frac tank area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04147
Date of Photo: 05.06.2024
Time of Photo: 11:08 hrs
Photographer: Anshul Paripati
Description: Close up view of secondary containment of the six white frac tanks in photo 12 in the oil waste separation frac tank area. The secondary containment had been folded over for an unknown amount of time.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

Photo Name: DSC04148
Date of Photo: 05.06.2024
Time of Photo: 11:13 hrs
Photographer: Anshul Paripati
Description: View of heavier solids frac tank storage area in the oil waste separation frac tank area.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Nature Environmental LLC		
City: Houston	County/Parish: Harris	State: Texas

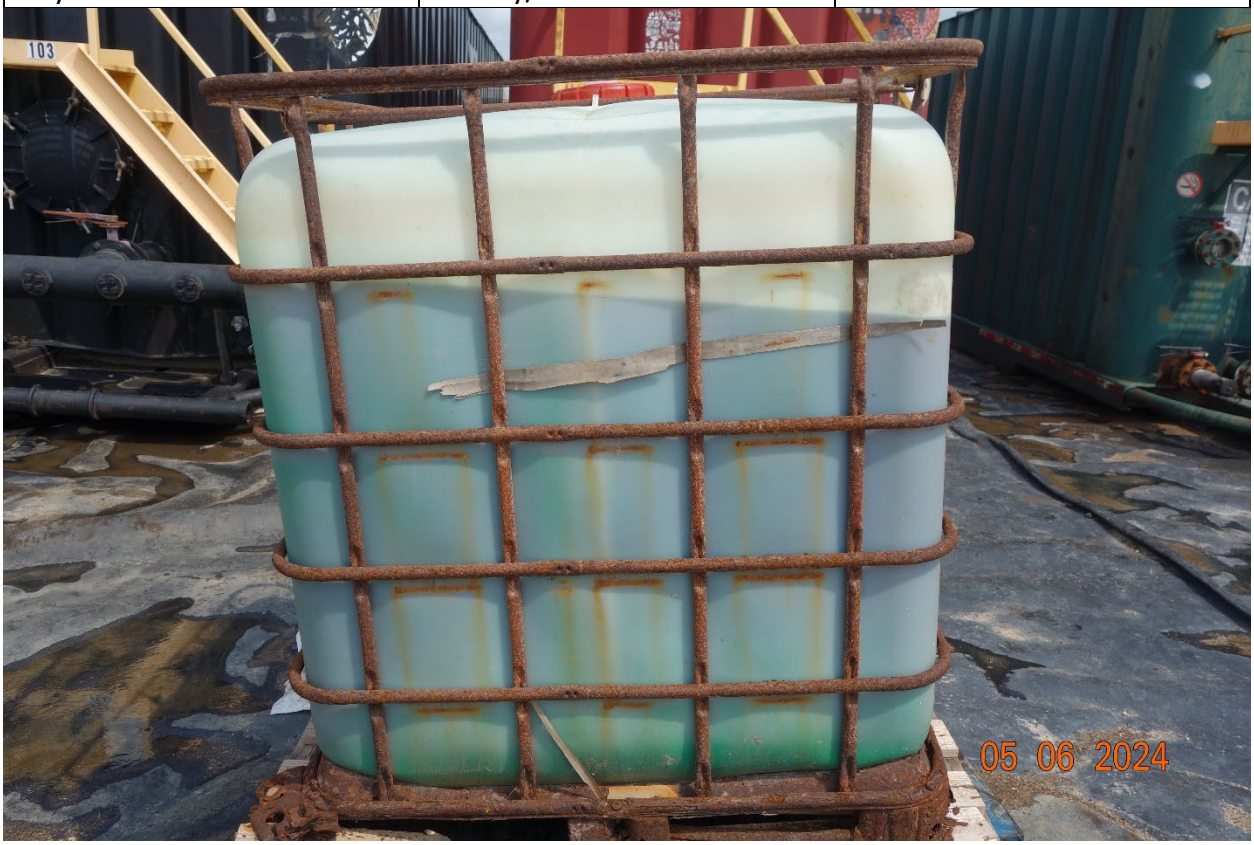

Photo Name: DSC04149
Date of Photo: 05.06.2024
Time of Photo: 11:13 hrs
Photographer: Anshul Paripati
Description: View of tote in heavier solids frac tank storage area (photo 15) without a label.

APPENDIX 2.
FOLLOW-UP EMAIL FROM NATURE ENVIRONMENTAL

FW: EPA Inspection-Houston

Nature Enviro Compliance <Compliance@natureenviro.com>

Wed 2024-06-05 11:47 AM

To:Cameron Tanaka <Cameron.Tanaka@erg.com>
Cc:Nature Enviro Compliance <Compliance@natureenviro.com>

6 attachments (6 MB)

EPA audit pictures ; Contingency Plan.pdf; Oil tesing-April 2024.pdf; EPA audit ; Oil Analysis Plan.pdf; SPCC PLAN.pdf;

Hi Cameron,

I don't know how I missed your name on this sir. My deepest apologies.

Kind Regards,

Nona Walker

From: Nature Enviro Compliance <Compliance@natureenviro.com>
Sent: Friday, May 17, 2024 5:10 PM
To: Joe Watson <Joe.Watson@erg.com>; Anshul Paripati <Anshul.Paripati@erg.com>; Gardner, Dedriel <Gardner.Dedriel@epa.gov>; Penland, John <Penland.John@epa.gov>; Ramrakha, Jayshika <Ramrakha.Jayshika@epa.gov>; Pandak, Debra (she/her/hers) <Pandak.Debra@epa.gov>
Cc: Nature Enviro Compliance <Compliance@natureenviro.com>
Subject: FW: EPA Inspection-Houston

Good Day All,

Please attached pictures, SPCC, Oil Analysis Plan, and Contingency Plan.

We have not had RCRA totes to date and is now taken off our manifests.
Copy of SPCC attached.
Copy of Contingency Plan is attached.
Oil Analysis Plan is attached.
The drums that were above the cooking oil was cooking grease/oil which has been emptied into the cooking oil tote.
The blue/green liquid in the tote near frac tanks is detergent/soap, which is now labelled, and picture is attached.
Records of analysis for April are attached.
Universal waste labels are on the wall. Pictures attached.
Free liquid from was sucked up from the used oil dumpster.
Secondary containment walls are up, and pictures are attached.
SPCC plan is updated with all frac tanks.
Copy of the Contingency Plan is in the SPCC binder now.

Please let us know if there is anything we have missed.

Kind Regards,

Nona Walker/ Compliance Coordinator

Email: compliance@natureenviro.com
Nature Environmental & Marine Services, LLC| 8713 Root Street Corpus Christi, TX 78409| USA

APPENDIX 3.
FOLLOW-UP PHOTOGRAPHS FROM NATURE ENVIRONMENTAL


SOAP
DETERGENT


PPRW
UNIVERSAL
WAST
Managing Paint and Paint-Related Waste
Under the Universal Waste Rule
CAUTION
GLOVES
REQUIRED
IN THIS AREA


UNIVERSAL
WASTE


NATIONAL
TANK & EQUIPMENT
(888) 213-7950
nterents.com
USED
OIL
USED OIL


M07-5052
NATIONAL
TANK & EQUIPMENT
888-213-7950
M11-4844
NATIONAL
TANK & EQUIPMENT
888-213-7950


NATIONAL
USED
OIL
FRC503074

APPENDIX 4.
NATURE ENVIRONMENTAL SPCC PLAN

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

NATURE ENVIRONMENTAL AND MARINE SERVICES, LLC
18511 Beaumont Hwy, Houston, TX 77049

June 05, 2018

AARC Environmental, Inc.
Two Riverway, Suite 1780
Houston, TX 77056

(713) 974-2272 • (833) 493-2272

AARC Project # 1-E-7120-80

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

NATURE ENVIRONMENTAL AND MARINE SERVICES, LLC
18511 Beaumont Hwy, Houston, TX 77049

June 05, 2018

Prepared by
Edwin C. Centeno

AARC Environmental, Inc. Firm# F-8525

AARC Environmental, Inc.
Two Riverway, Suite 1780
Houston, TX 77056

(713) 974-2272 • (833) 493-2272

AARC Project# 1-E-7120-80

TABLE OF CONTENTS

List of Acronyms and Abbreviations

ANSI	American National Standards Institute
API	American Petroleum Institute
ASME	American Society of Mechanical Engineers
AST	Aboveground storage tank
ASTM	American Society for Testing and Materials
BMP	Best Management Practices
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
LEPC	Local Emergency Planning Commission
NAICS	North American Industrial Classification System
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
OSHA	Occupational Safety and Health Association
PE	Professional Engineer
PEI	Petroleum Equipment Institute
POTW	Publicly Owned Treatment Works
RQ	Reportable quantity
SOS	Safety Data Sheet
SIC	Standard Industrial Classification
SPCC	Spill Prevention, Control, and Countermeasure
STI/SPFA	Steel Tank Institute/Steel Plate Fabricators of America
SWPPP	Storm Water Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
TRRC	Texas Railroad Commission
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UST	Underground storage tank

INTRODUCTION

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by Nature Environmental and Marine Services, LLC to prevent oil discharges from occurring, and to prepare Nature Environmental and Marine Services, LLC to respond in safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations,* Part 112 (40 CFR part 112), and supersedes any earlier Plan developed to meet provisions in effect since 1974.

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records; as a tool to communicate practices on preventing and responding to discharges with Nature Environmental and Marine Services, LLC employees and contractors; as a guide on facility inspections; and as a resource during emergency response.

A facility is subject to SPCC regulations if the total aboveground storage capacity of oil and oil products exceeds 1,320 gallons; or if the underground storage capacity exceeds 42,000 gallons; and if, because of its location, the facility could reasonably be expected to discharge oil into navigable waters of the United States. Containers with a capacity of less than 55 gallons of oil or oil products are exempted from the requirements under the Oil Pollution Prevention regulations.

"Oil" is defined in 40 CFR 112.2 as "oil of any kind or in any form, including, but not limited to: fats, oils, or greases from animals, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes

other than dredge spoil." This definition includes many transformer oils, hydraulic oils, and other oils.

This SPCC Plan addresses two basic issues: (1) design, operation, and maintenance procedures to prevent and control oil spills; and (2) discharge response procedures for facility personnel. More specifically, the first basic issue encompasses

- measures designed for the prevention of operational error and equipment failure, which are the causes of most spills; and
- the control and recovery of any oil spill by containment structures to prevent a spill from entering navigable waters.

The second basic issue specifically encompasses countermeasures (contingency plan) to contain, clean up, and mitigate the effects of an oil spill at or from the facility.

This Plan is not intended to address materials classified as hazardous wastes covered by 40 CFR 265 or Texas Waste Regulations that are stored in Nature Environmental and Marine Services, LLC However, used oils stored in different areas located in the general facility that are not covered by 40 CFR 265 or Texas Waste Regulations are therefore addressed in this SPCC Plan.

Nature Environmental and Marine Services, LLC management has determined that this facility does not pose a risk of substantial harm under 40 CFR 112, as recorded in the "Substantial Harm Determination" included in Appendix B of this Plan.

This Plan provides guidance on key actions that Nature Environmental and Marine Services, LLC must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests and Records section of this Plan (Section 2.7) using the inspection checklists included in Appendix C.

- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Prevention Procedures section of this Plan (Section 2.8) and document them on the log included in Appendix E.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 6 Regional Administrator (RA) and the Texas Commission on Environmental Quality (TCEQ), along with other information available as detailed in Section 4.4 of this Plan:
  - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event, or
  - The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12 month period.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer (PE) on the certification page of this Plan.
- Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised plan must be certified by a PE.
- Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information and phone numbers. Administrative changes will be documented in the Plan review log of this Plan, but do not have to be certified by a PE.

- Amend the SPCC Plan if required by the EPA Regional Administrator. Nature Environmental and Marine Services, LLC must amend the Plan as required within 30 days after such notice, unless the Regional Administrator, for good cause, specifies another effective date. Nature Environmental and Marine Services, LLC must implement the amended Plan as soon as possible, but not later than six months after the amendment, unless the Regional Administrator specifies another date. Regional Administrator required amendments can be administrative or technical or both.

MANAGEMENT APPROVAL AND DESIGNATED PERSON

40 CFR 112.7

Nature Environmental and Marine Services, LLC is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention, Control, and Countermeasure through the implementation and regular review and amendment to this plan. This SPCC Plan has the full approval of Nature Environmental and Marine Services, LLC management. Nature Environmental and Marine Services, LLC has committed the necessary resources (including manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful) to implement the measures described in this Plan.

The following is the Designated Person Accountable for Oil Spill Prevention at the facility and has the authority to commit the necessary resources to implement this Plan.

Authorized Facility Representative: Mrs. Nona Walker

Title: Compliance Coordinator

Signature: Nona Walker

Date: 5-17-2024

PROFESSIONAL ENGINEER CERTIFICATION
40 CFR 112.3(d)

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR Part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR Part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for Nature Environmental and Marine Services, LLC located at 18511 Beaumont Hwy, Houston, TX 77049.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan.

06/05/2018

Signature Date

Edwin C. Centeno - Jimenez
Name of Professional Engineer

101780
Registration Number

TX
Issuing State

LOCATION OF SPCC PLAN
40 CFR 112.3(e)

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC is maintained at the facility office located at 18511 Beaumont Hwy, Houston, TX 77049. This Plan must be available to the Regional Administrator for on-site review during normal working hours.

PLAN REVIEW
40 CFR 112.3 and 112.5

Changes in Facility Configuration

In accordance with 40 CFR 112.5(a), Nature Environmental and Marine Services, LLC periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning or decommissioning of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- Change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- Change in the name or contact information of spill response or cleanup contractors.

Nature Environmental and Marine Services, LLC must make the needed revisions to the SPCC Plan as soon as possible, but no later than six (6) months after the change occurs, The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The facility manager is responsible for initiating and coordinating revisions to the SPCC Plan.

Scheduled Plan Reviews

In accordance with 40 CFR 112.5(b), Nature Environmental and Marine Services, LLC reviews this SPCC Plan at least once every five years. Revisions to the Plan, if needed, are made within six months of the five-year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). The Plan is dated June 05, 2018. The next plan review is therefore scheduled to take place on or prior to June 04, 2023.

Record of Plan Reviews

Scheduled reviews and Plan amendments are recorded in this Plan. This log will be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan will occur by June 04, 2023.

RECORD OF PLAN REVIEW AND AMENDMENTS

RECORD OF PLAN REVIEW AND AMENDMENTS

Non-Technical Amendments

- Non-technical amendments are not certified by a Professional Engineer
- Examples of changes include, but are not limited to: phone numbers, name changes, or any non-technical text change(s).

Technical Amendments

- Technical amendments are certified by a Professional Engineer
- Examples of changes include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacements, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes in product or service; revision of standard operation or maintenance procedures at a facility; or changes in facility design, construction operation, or maintenance that materially affects the potential for discharges.
- An amendment made under this section will be prepared within six months of the change and implemented as soon as possible but not later than six months following preparation of the amendment.

Documentation of SPCC Plan reviews and evaluations shall be recorded in the table below and according to the following statement:

I have completed a review and evaluation of the SPCC Plan for Nature Environmental and Marine Services, LLC As a result, I (will)/(will not) amend the Plan, as indicated below.

Review/Eva!. Date	Amend Plan?	Technical Amendment?	Signature	Next Review/Eva!. Not Later Than
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	Yes / No	Yes / No		
	Yes / No	Yes / No		
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	Yes / No	Yes / No		
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	Yes / No	Yes / No		
	Yes / No	Yes / No		

AAA Environmental, Inc.

Environmental, Occupation, Health & Safety Solutions

12/3/2018

Technical Amendment for Nature Environmental and Marine Services, LLC SPCC Plan

1. Tank 4 to T-10 (7 Frac tanks) were added. All tanks have a capacity of 500 bbl (21,000 gallons). Quantity of tanks can vary from 2 to 12 tanks or from 42,000 gallons to 252,000 gallons of oily water).
2. Frac-tanks used to store ***oily water*** from ships. Frac-tank is a single walled ¼" steel walls and floor.
3. Each tank has an individual secondary containment and is sited near T-1 and T-2 (See Attached Drawing).
4. Secondary containment calculations for individual these tanks are available on SPCC Appendix F (All secondary containments are the same).

None of the individual secondary containments are complying with the SPCC regulation §112.8(c)(2) Bulk storage containers:

Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) *so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil.* Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.

Within three months of this technical amendment the owner or operator must modify or construct new tank installations (secondary containment) that comply with the conditions stated in this amendment and 40 CFR 112.8(c)(2).

Edwin C. Centeno-Jimenez

Edwin C. Centeno-Jimenez
12/3/2018

RECORD OF PLAN REVIEW AND AMENDMENTS

Nature Environmental and Marine Services, LLC

Review/Eval. Date	Amend Plan?	Technical Amendment?	Signature	Next Review/Eval. Not Later Than
	Yes / No	Yes / No		
	Yes / No	Yes / No		
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RECORD OF PLAN REVIEW AND AMENDMENTS

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FACILITIES, PROCEDURES, METHODS, OR EQUIPMENT NOT YET FULLY OPERATIONAL
40 CFR 112.7

Section 3.2.6 of this Plan describes the inspection program to be implemented by the facility following a regular schedule, including the dates by which each of the bulk storage containers will be tested.

CROSS REFERENCE WITH SPCC PROVISIONS
40 CFR 112.7

The SPCC Plan does not follow the exact order presented in 40 CFR part 112. Section headings identify, where appropriate, the relevant sections of the SPCC rule. **Table 1-1** presents a cross-reference of Plan sections relative to applicable parts of 40 CFR part 112.

Table 1-1 - Cross-Reference with SPCC provisions

Provision*	Plan Section	Page
112.3(d)	Professional Engineer Certification	6
112.3(e)	Location of SPCC Plan	7
112.5	Plan Review	8
112.7	Management Approval	5
112.7	Cross-Reference with SPCC Rule	13
112.7(a)(3)	Part I - General Information and Facility Diagram Appendix A: Site Plan and Facility Diagrams	15 42
112.7(a)(4)	Section 4.4: Discharge Notification Appendix I: Discharae Notification	40 60
112.7(a)(5)	Part IV - Discharge Response Aooendix J: Discharae Response Equipment Inventory	37 62
112.7(b)	Section 2.4: Potential Discharge Volume and Direction of Flow	19
112.7(c)	Section 2.5: Containment and Diversionary Structures	20
112.7(d)	Section 2.6: Practicability of Secondary Containment Appendix F: Volume Required for Secondary Containment	**22** 53
112.7(e)	Section 2.7: Inspections, Tests, and Records Appendix C: Facility Inspection Checklists	22 47
112.7(f)	Section 2.8: Personnel, Training, and Discharge Prevention Procedures Appendix E: Record of Annual Discharge Prevention Briefing and Training	28 52

* Only relevant rule provisions are indicated. For a complete list of SPCC requirements, refer to the full text of 40 CFR 112.

PART I - GENERAL FACILITY INFORMATION

40 CFR 112.7(a)(3)

1.1 Facility Owner and Operator

Facility Name	Nature Environmental and Marine Services, LLC
Owner	Nature Environmental and Marine Services, LLC
Address of Owner	8713 Root St. Corpus Christi, TX 78409
	Phone: 866-770-7952
Name of Operator	Mr. Vivian Irlas Jr.
Address of Operator	18511 Beaumont Hwy, Houston, TX 77049
	Phone: 866-770-8952
SIC Code	4213 - Trucking, Except Local and 5093 - Scrap and Waste Materials
NAICS Code	484121 - General Freight Trucking, Long-Distance, Truckload and 425110 - Business to Business Electronic Markets

1.2 Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the CEO of the facility. 24-hour contact information is provided in **Table 1-2.**

Table 1-2: Facility contact information

Name	Title	Telephone	Address
Sudhakar Yenumala	VP	434-825-4858	18511 Beaumont Hwy, Houston, TX 77049
James Lemos	Operations Manager	832-948-4371	18511 Beaumont Hwy, Houston, TX 77049
Nona Walker	Complaince Coordinator	361-425-1004	18511 Beaumont Hwy, Houston, TX 77049

1.3 Facility Location and Operations

Nature Environmental and Marine Services, LLC operates this facility located at 18511 Beaumont Hwy, Houston, TX 77049 (see Figure A-1 in Appendix A). The facility is located in Harris County.

1.4 Facility Oil Storage and Handling

A list of bulk oil storage containers at the facility with capacity of 55 gallons or more is provided in the **Table 1-3.** Only those containers that contain materials classified as "oil" are addressed in this SPCC Plan.

Table 1-3: Characteristics of oil storage containers

Map ID	Tank ID	Construction	Contents	Location	Capacity (Gallons)
Bulk oil storage containers (ASTs)					
T-1	Horizontal Rectangular Frac Tank	¼" Corrugated Steel (See dimensions in Appendix A, Fiaure A-3)	Oily Water	Southwest of Warehouse/Office	21,000
T-2	Horizontal Rectangular Frac Tank	¼" Corrugated Steel (See dimensions in Appendix A, Figure A-3)	Oily Water	Southwest of Warehouse/Office	21,000
Drums/Totes/Other Containers					
T-3	Portable Containers (8 drums; 55 gallons)	Steel (2'-0" 0 X 2'-10½" H)	Oily Water	Adjacent to Warehouse/Office	440
				Total	**42,440**

1.4 Facility Oil Storage and Handling

A list of bulk storage containers with capacity of 55 gallons or more is provided in the AMENDED Table 1-21. Only those containers that contain materials classified as "oil" as addressed in this SPCC Plan.

MAP ID	TANK ID	Construction	Contents	Location	Capacity(ga)
Bulk Oil Storage Containers (ASTs)					
T-1	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-2	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-3	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-4	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-5	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-6	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-7	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-8	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-9	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-10	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	8,000
T-11	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-12	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-13	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-14	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-15	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-16	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-17	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-18	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-19	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-20	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000
T-21	Horizontal rectangle tank	1/4 corrugated steel	Oily Water	Southwest of W/H	21,000

16(a)

The Site Plan and Facility Diagram included in Appendix A of this Plan show the location and layout of the facility. The Facility Diagram (Figure A-2) shows the location of oil containers.

The total aboveground capacity of all bulk oil-containing storage containers at this facility is 197,000 gallons. There are no bunkered tanks or underground tanks at the facility.

1.5 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

The facility is located west of San Jacinto River. The site plan in Figure A-1 in Appendix A shows the location of the facility relative to nearby waterways. The facility diagram included in Figure A-2 in Appendix A indicates the general direction of drainage. In the event of an uncontrolled discharge, oil would follow the natural topography of the site and flow to San Jacinto River.

1.6 Discharge History

There have been no discharges of oil from this facility. In the event of an oil discharge, the required information will be recorded in this section.

PART II - DISCHARGE PREVENTION - GENERAL PROVISIONS 40 CFR 112.7

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees have received training in the proper implementation of these measures.

2.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

When product enters or exits containers at this facility, a trained operator supervises the process, including the opening and closing of the container valves and the opening and closing of fill caps. The above ground storage containers and drums are positioned such that adequate secondary containment is provided for the largest single container in order to prevent a discharge of oil into navigable water.

2.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Figure A-1 in Appendix A shows the location of the facility. Figure A-2 in Appendix A presents a layout of the facility and the general location of oil-storage containers. The diagram also shows the location of any storm water drain inlets and the direction of surface water runoff. As required under 40 CFR 112.7(a)(3), the facility diagram indicates the location and content of ASTs, USTs, transfer stations, connecting piping and containment.

2.3 Spill Reporting (40 CFR 112.7(a)(4))

The discharge notification form included in Appendix I will be completed upon immediate detection of a discharge an prior to reporting of a spill to the proper notification contacts (see Appendix H).

2.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 2-1 presents expected volume, discharge rate, general direction of flow in the event of equipment failure, and means of secondary containment for each oil container stored at the facility.

Table 2-1: Potential discharge volumes and flow direction

Map ID	Type of Event	Maximum Volume {aal)	Maximum Discharge Rate {gal/min)	Direction of Flow	Secondary Containment Description
Bulk oil storaae containers (ASTs)					
T-1	Rupture Leakage Overfill	21,000 21,000 1,750	10,500 14.58 350	East towards San Jacinto River	Aluminum Angle Standard Portable Containment Berm
T-2	Rupture Leakage Overfill	21,000 21,000 1,750	10,500 14.58 350	East towards San Jacinto River	Aluminum Angle Standard Portable Containment Berm
Drums/Totes/Other Containers					
T-3	Rupture Leakage Overfill	55 55 NA	27.5 0.04 NA	East towards San Jacinto River	Concrete Containment

NOTE:

1 Rupture and leakage volumes were estimated by assuming complete loss of the entire capacity of the tank
2 Overfill volume was estimated by assuming that the delivery person would take 5 minutes to notice overfill
3 Discharge rate for tank rupture was calculated by assuming full discharge in 2 minutes
4 Discharge rate for leakage was calculated by assuming the container will empty its contents within 24 hrs
5 Delivery rate is estimated to be 350 gpm for T-1 and T-2; NA gpm for T-3.
6 New Drums and totes are not filled on site. Used drums and totes usually are filled on site with used oil or other substances

2.5 Containment and Diversionary Structures

As required by 40 CFR 112.7(c), the secondary containment system (shown in Figures A-2) must be capable of containing oil and constructed so that any discharge from a primary containment system must not escape the containment system before cleanup occurs.

Tank T-1 (Steel; Oily Water; 21,000 gallons) is sited in an aluminum angle standard portable containment berm C-1 (capacity of 5,745 gallons). The existing secondary containment C-1 volume is insufficient to contain the capacity of the largest single container (T-1) including sufficient freeboard to contain precipitation. Within three months of the implementation of this plan the facility must provide secondary containment sufficient to hold the full capacity of T-1 and sufficient freeboard to contain precipitation. The facility has made a written commitment to have manpower, equipment, and materials

Table 2-1 Potential Discharge Volumes and Flow Direction

A list of bulk storage containers with the capacity of 55 gallons or more is provided in the AMENDED table 1-11. Only those containers that contain materials classified as "oil" are addressed in this SPCC plan.

Table 1-11: Characteristics of oil storage container

Map ID	Type of Event	Max Volume	Max Discharge	Direction Flow	Secondary Contain Description
T-1	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-2	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-3	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-4	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-5	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-6	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-7	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-8	Rapture	21,000	10,500	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-9	Rapture	8,000	4,000	East towards Delta	72' x 72' x 24" LLDPE
	Leakage	8,000	TBD		
	Overfill	133	TBD		

20(a)

T-10	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-11	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-12	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-13	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-14	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-15	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-16	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-17	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-18	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-16	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-17	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE
	Leakage	21,000	14.58		
	Overfill	1,750	350		
T-18	Rapture	21,000	10,500	East towards Delta	12' x 40' x 24" LLDPE

20(b)

Leakage		21,000	14.58		
	Overfill	1,750	350		
~~T-19~~	~~Rapture~~	~~21,000~~	~~10,500~~	~~East towards Delta~~	~~12' x 40' x 24" LLDPE~~
	~~Leakage~~	~~21,000~~	~~14.58~~		
	~~Overfill~~	~~1,750~~	~~350~~		
~~T-20~~	~~Rapture~~	~~21,000~~	~~10,500~~	~~East towards Delta~~	~~12' x 40' x 24" LLDPE~~
	~~Leakage~~	~~21,000~~	~~14.58~~		
	~~Overfill~~	~~1,750~~	~~350~~		
~~T-21~~	~~Rapture~~	~~21,000~~	~~10,500~~	~~East towards Delta~~	~~12' x 40' x 24" LLDPE~~
	~~Leakage~~	~~21,000~~	~~14.58~~		
	~~Overfill~~	~~1,750~~	~~350~~		

The above 3 fracs are now empty and we will be returning.

20(c)

available to the facility to respond to a release. During the time until adequate secondary containment is provided, the facility must deploy active secondary containment. Once provided Nature Environmental and Marine Services, LLC must keep the secondary containment clear of debris. The facility must ensure that the secondary containment system must be free of cracks, holes, or gaps and be sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed. T-1 is located outside so the owner or operator needs to provide extra volume for a freeboard of 9.9 inches. See calculations in Appendix F.

Tank T-2 (Steel; Oily Water; 21,000 gallons) is sited in an aluminum angle standard portable containment berm C-2 (capacity of 5,745 gallons). The existing secondary containment C-2 volume is insufficient to contain the capacity of the largest single container (T-2) including sufficient freeboard to contain precipitation. Within three months of the implementation of this plan the facility must provide secondary containment sufficient to hold the full capacity of T-2 and sufficient freeboard to contain precipitation. The facility has made a written commitment to have manpower, equipment, and materials available to the facility to respond to a release. During the time until adequate secondary containment is provided, the facility must deploy active secondary containment. Once provided Nature Environmental and Marine Services, LLC must keep the secondary containment clear of debris. The facility must ensure that the secondary containment system must be free of cracks, holes, or gaps and be sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed. T-2 is located outside so the owner or operator needs to provide extra volume for a freeboard of 9.9 inches. See calculations in Appendix F.

Tank T-3 (Steel; 55 gallons Drums; Oily water) is placed inside a concrete secondary containment C-3 (capacity of 1,148 gallons). The existing secondary containment C-3 volume is sufficient to contain the capacity of the largest containment, T-3. The facility must ensure that the secondary containment system must be free of cracks, holes, or gaps and be sufficiently impervious to contain leaks, spills, and accumulated rainfall until

the collected material is detected and removed. T-3 is located in an area with a shed roof thus eliminating the need to provide extra volume for freeboard. See calculations in Appendix F.

Nature Environmental and Marine Services, LLC has commissioned the preparation of this oil spill contingency plan and a written commitment to have manpower, equipment and materials available to the facility to respond to a release as described in 40 CFR 112.7(k)(2) has been made by Nature Environmental and Marine Services, LLC. Nature Environmental and Marine Services, LLC must periodically inspect the tanks (as described in Sections 2.7) and ensure good housekeeping practices (including but not limited to those described in Appendix L) are used during routine maintenance activities. Nature Environmental and Marine Services, LLC must also ensure that oil from any spill is managed and disposed following all regulatory requirements.

2.6 Practicability of Secondary Containment

As required by 40 CFR 112.?(d), the facility management has determined that secondary containment is practicable.

2.7 Inspections, Test, and Records

All bulk storage containers must be inspected on a regular schedule, including the outside of the container for deterioration, discharges, or accumulations of oil inside containment. A walk around inspection is intended for portable bulk storage containers while non-portable bulk storage containers are subject to the inspection requirements as outlines in STI/SPFA SP001 Standard.

Inspection of oil filled equipment or mobile equipment tanks are subject to the existing operating, maintenance and inspection procedures for each piece of machinery or equipment. Documentation and record keeping of these inspections are managed through Nature Environmental and Marine Services, LLC's usual and customary business practices.

Non-portable bulk storage containers are subject of routine visual inspections per STI/SPFA SP001 Standard. Monthly inspections will be conducted by AARC Environmental, Inc. Formal internal and external inspections are conducted by certified inspectors per the SP001 Standard. Any tanks subject to a different inspection schedule than the one outlined in the Inspection portion of the SPCC are identified in the appendices. The inspection exceptions are based on good engineering practices, determined by the professional judgment of the Professional Engineer who certified the Plan and has given consideration to industry standards.

Nature Environmental and Marine Services, LLC must conduct inspections and tests in accordance with 40 CFR 112.7(e). Based on the criteria developed in SP001, the inspection schedules for the tanks at the Nature Environmental and Marine Services, LLC facility located at 18511 Beaumont Hwy, Houston, TX 77049 have been determined and summarized.

Table 2-2: General inspection schedule evaluation for tanks at facility

Container	AST Type	Volume Caallons)	Spill Control	CRDM	Category	*Inspection Schedule
T-1	Horizontal Rectangular Frac Tank	21,000	No	Yes	3b	[P, E&L (5), 1(10)] or [P. L(1}. E(5}I
T-2	Horizontal Rectangular Frac Tank	21,000	No	Yes	3b	[P, E&L (5), 1(10)] or [P, L{1}. E(5}I
T-3	Vertical Steel Portable Container (Drums)	55	Yes	Yes	1	ap

·This is a suggested inspection schedule. Final schedule to be selected by client in consultation with an STI certified inspector or professional engineer.

alf a portable container is taken out of the spill containment pallets then their category changes from Category 1 to Category 3 and the following **notes applies.

bFor T-1 and T-2 if additional spill control is added their category will change to 1 and so the inspection schedule.

****Notes:**

P - Periodic AST inspection
E - Formal External Inspection by certified inspector
I - Formal Internal Inspection by certified inspector
L - Leak test by owner or owner's designee
( ) indicates maximum inspection interval in years

Category 1 -ASTs with spill control, and with CROM
Category 2 - ASTs with spill control and without CROM
Category 3 - ASTs without spill control and without CROM

P** - Owner shall either discontinue use of portable container for storage as scheduled below or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule if the portable container do not have spill control (i.e., Category 3):

Plastic portable container - every 7 years
Steel portable container - every 12 years
Stainless steel portable container - every 17 years

Additional information:

Frac tanks are not constructed following any industry standard (UL, API, etc.) meaning that the inspection of these tanks is at the discretion of the owner and the professional engineer.

Table 2-2: General Inspection Schedule evaluation for tanks at facility

T-1 through T-10 are inspected as on page 24

24 (a)

Table 2-3 summarizes the various types of inspections and tests performed at the facility.

Table 2-3: Routine inspection and testing program.

Facility Component	Action	Frequency/ Circumstances
Aboveground container	Visually inspect container integrity and inspect outside of container for signs of deterioration and discharges	Continuous, Monthly and Annual
Container supports and foundation	Inspect container supports and foundations	Continuous, Monthly and Annual
Secondary Containment	Inspect for signs of deterioration, discharges, or accumulation of oil or water inside diked areas. Visually inspect content for presence of oil	Continuous, Monthly and Annual Prior to draining
Lowermost drain and all outlets of tank truck	Visually inspect	Prior to filling and departure
All aboveground valves, piping, and appurtenances	Assess general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces	Continuous, Monthly and Annual
Periodic integrity testing	Please refer to STI/SPFA SP001, 6th Ed., January, 2018	Please refer to STI/SPFA SP001

Table 2-4: Suggested inspection schedule for Formal Inspections

Tank ID	Construction Date (In service Date)	Last External and Internal Inspection	Next Inspection (External)*	Next Inspection (Internal)*
1	unknown	unknown	Will depend on the inspection schedule selected	Will depend on the inspection schedule selected
2	unknown	unknown	Will depend on the inspection schedule selected	Will depend on the inspection schedule selected
3	unknown	unknown	Not required	Not required

* A formal inspection is one conducted by a certified inspector.

Note: If information became available about any not known date in the above Table, the owner/operator is responsible to notify a PE to adjust the schedule accordingly.

Table 2-4: Suggested inspection schedule for Formal Inspections

Tank T-1 through 10	**will depend on the inspection schedule**

25 (a)

A record of the inspections/tests signed by the supervisor or inspector conducting the inspection/tests will be retained in the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

2.7.1 Daily Inspection

The facility employees perform continuous, undocumented inspections of the facility each day. This daily visual inspection involves observing container/piping for damage or leakage, stained or discolored soils, or accumulation of water in the secondary containment areas.

2.7.2 Monthly Inspection

The checklist provided in Appendix C is used for monthly inspections by the facility personnel. The monthly inspections cover the following key elements:

- Observing the exterior of oil-storage containers, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing the exterior of portable containers for signs of deterioration or leaks.
- Observing container foundations and supports for signs of instability or excessive settlement.
- Observing the container fill and discharge pipes for signs of poor connection that could cause a discharge, and container vents for obstructions and proper operation.
- Verifying the proper functioning of overfill prevention systems.
- Checking the inventory of discharge response equipment and restocking as needed.

All problems regarding containers, piping, containment, or response equipment will immediately be reported to the authorized facility representative. Visible oil leaks from container walls, piping, or other components will be repaired as soon as possible to

prevent a larger spill or a discharge to navigable waters. Pooled oil is removed immediately upon discovery.

Written monthly inspection records are signed by the authorized facility representative and maintained with this SPCC Plan for a period of three years.

2.7.3 Annual Inspection

Facility personnel perform a more thorough inspection of facility equipment on an annual basis. This annual inspection complements the monthly inspection described above and the checklist is provided in Appendix C of this Plan.

Written annual inspection records are signed by the authorized facility representative and maintained with this SPCC Plan for a period of three years.

2.7.4 Periodic Integrity Testing

All non-portable/non-mobile bulk storage containers must be tested on a regular schedule and whenever material repairs are made unless: there is an environmental equivalency identified that has given consideration to good engineering practices and verified by the Professional Engineer who certified the Plan or it is exempt.

Steel Tank Institute STI/SPFA SP001 industry standard is followed unless the tank is 50-feet or taller, or 30-feet or greater in diameter; then refer to API 653 Standard. Records of integrity testing are maintained according to Nature Environmental and Marine Services, LLC usual and customary business practices.

The following table shows the integrity testing schedule and required frequency in years per STI/SPFA SP001- Standard for the Inspection of Aboveground Storage Containers, 6th Edition Issued January 2018:

Table 2-5: SP001 inspection schedule for shop-fabricated AST's, Field-erected AST's and Portable Containers

AST Type and Size (US gallons)		Category 1	Category 2	Category 3
Shop-Fabricated AST's	0 - 1,100	p	p	P, E&L (10)
	1,101 - 5,000	p	P, E&L (10)	[P, E&L (5), 1(10)] or [P, L(2), E(5)]
	5,001 - 30,000	P, E(20)	[P, E(10), 1(20)] or [P,E(5), L(10)]	[P, E&L (5), 1(10)] or [P, L{1), E(5)]
	30,001 - 75,000	P, E(20)	P, E&L (5), 1(15)	P, E&L (5), 1(10)
Field-erected AST		P, E(5), 1(10)	P, E&L(5), 1(10)	P, E&L(5), 1(10)
Portable Containers		p	p	P**

Notes:
P - Periodic AST inspection
E - Formal External Inspection by certified inspector
I - Formal Internal Inspection by certified inspector
L - Leak test by owner or owner's designee
( ) indicates maximum inspection interval in years

Category 1 - ASTs with spill control, and with CRDM
Category 2 - ASTs with spill control and without CRDM
Category 3 - ASTs without spill control and without CRDM

P** - Owner shall either discontinue use of portable container for storage as scheduled below or have the portable container DOT (Department of Transportation) tested and recertified per the following schedule if the portable container do not have spill control (i.e., Category 3):

Plastic portable container - every 7 years
Steel portable container - every 12 years
Stainless steel portable container - every 17 years

Nature Environmental and Marine Services, LLC shall select with the inspector which of the following integrity test will perform in their tanks (the list is not all inclusive):

- Ultrasonic thickness (UT) testing
- UT scanning readings
- Magnetic particle testing (MT)
- Radiographic testing (RT)
- Magnetic flux testing (MFL)
- Penetrant testing (PT)

As for the leaking testing methods for shop-fabricated ASTs, the standard references the Steel Tank Institute Recommended Practice R912, "Installation Instructions for Shop Fabricated Stationary Aboveground Storage Tanks for Flammable, Combustible Liquids." There also exist some types of Leaking Testing Methods like:

- Gas pressure decay
- Gas pressure soap bubble testing
- Gas tracers
- Soil tracers
- Mass measurement
- Level measurement
- Hydrostatic testing

2.8 Personnel, Training, and Discharge Prevention Procedures

The authorized facility representative is the designated person responsible for oil discharge prevention, control, and response preparedness activities at this facility.

In accordance with 40 CFR 112.7(f), the facility has trained oil-handling facility personnel in the operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. Any new facility personnel with oil-handling responsibilities are provided with this same training prior to being involved in any oil operation.

Annual discharge prevention briefings are held by the authorized facility representative for all facility personnel involved in oil operations. The briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Records of the briefings and discharge prevention training are kept on the form shown in Appendix E and maintained with this SPCC Plan for a period of three years.

2.9 Security

Nature Environmental and Marine Services, LLC entrance gates are locked when the facility is unattended. All valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating status or non-standby status.

The starter control on each oil pump is locked in the "off" position and located at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status. The loading/unloading connections of oil pipelines or facility piping are securely capped or blank-flanged when not in service or when in standby service for an extended time.

The facility has adequate lighting commensurate with the type and location of the facility that will assist in the:

- Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.); and

- Prevention of discharges occurring through acts of vandalism.

2.10 Tank Truck Loading/Unloading Rack Requirements

This facility does not utilize a tank car or tank truck loading rack for transferring oil. General guidelines for transferring oil are contained in Appendix L.

2.11 Brittle Fracture Evaluation

Nature Environmental and Marine Services, LLC does not have any field-constructed aboveground container, then in accordance with 40 CFR 112.?(i), and under STI/SPFA SP001, 6th Ed., January, 2018, brittle fracture evaluation is not required for any tank in this facility because the tank shells are under½ inch thick and the risk of brittle fracture is minimal. Brittle fracture assessments and documentation are not required for tanks that fall within the scope of this Standard.

Nonetheless, in the event that a field constructed aboveground container undergoes a repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure, the container will be evaluated for risk of discharge or failure, following API-653 or STI/SPFA SP001 or an equivalent approach, and corrective action will be taken as necessary.

2.12 Conformance with State and Local Applicable Requirements

In addition to the requirements under 40 CFR 112, the Texas Commission on Environmental Quality (TCEQ) further regulates certain oil storage containers under Texas Administrative Code, Title 30, Chapter 334- Underground and Aboveground Storage Containers and oil spills under 30 TAC Chapter 327 - Spill Prevention and Control. State and local oil spill related requirements have been incorporated into this SPCC Plan where applicable.

Applicable Spill Reporting Requirements for Spills to Water*

	US EPA (Region VI)/ NRC	TCEQ
Reportable Quantity (RQ) for: Vegetable Oils (i.e. Palm Oil, Soy Oil, etc) Lubricating Oil Used Oil Petroleum Oils	 Sheen Sheen Sheen Sheen	 Sheen Sheen Sheen Sheen
Initial Reporting Time	Immediately upon discovery of a release	As soon as possible but no later than 24 hours after discovery of a release
Follow up Report Time	Within 60 Calendar Days if spill exceeds 1,000 gallons or second spill of 42 aallons in 12 months	30 Calendar Days

***Spills to water includes spills or releases to stormwater**

Applicable Spill Reporting Requirements for Spills to Land**

	US EPA (Region VI)/ NRC	TCEQ
Reportable Quantity (RQ) for: Vegetable Oils (i.e. Palm Oil, Soy Oil, etc) Lubricating Oil Used Oil Petroleum Oils	 N/A N/A N/A NA	 210 gallons 25 gallons 25 gallons 25 gallons
Initial Reporting Time	N/A	As soon as possible but no later than 24 hours after discover of a release
Follow uo Reoort Time	N/A	30 davs

****Spills to land include spills or releases that occur on soil, concrete and/or asphalt on-site or off-site.**

PART Ill - DISCHARGE PREVENTION - ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES) 40 CFR 112.8

3.1 Facility Drainage Controls

Any potential discharge from oil-storage containers will be restrained by secondary containment structures. The content of the secondary containment areas are inspected by the facility personnel for the presence of oil or sheen. A facility employee or contractor will remove any oil accumulated within the secondary containment area to a tank, tank truck, or other appropriate container for disposal in accordance with applicable legal requirements.

3.2 Bulk Storage Containers

All oil storage containers at the facility are constructed of welded steel or plastic compatible with the contents at the specified operating conditions (pressure and temperature).

3.2.1 Construction

All oil containers used at this facility are constructed of welded steel or plastic. The design and construction of all bulk storage containers are compatible with the oil they contain under the specified conditions.

3.2.2 Secondary Containment

Aboveground Storage Tanks

The ASTs on-site include two (21,000 gal) oily water AST. All AST's are inside secondary containments made of PVC (aluminum angle standard portable containment berms).

Drums/Totes/Containers

Inside the facility there is various (55 gallons) oily water drums. All portable containers are inside a secondary containment made of concrete.

Please see Appendix F for detailed secondary containment calculations.

3.2.3 Drainage of Containment Areas

Secondary containment areas are drained under direct supervision of facility personnel. The accumulated water is observed for signs of oil prior to draining. The content of the secondary containment areas are inspected by the facility personnel for the presence of oil or sheen. Containment drainage events are recorded on the form included in Appendix D of this Plan. Records are maintained at the facility for at least three years.

3.2.4 Corrosion Protection

This section is not applicable to Nature Environmental and Marine Services, LLC, since there are no partially buried or underground metallic storage tanks at the facility.

3.2.5 Partially Buried and Bunkered Storage Containers

This section is not applicable to Nature Environmental and Marine Services, LLC, since there are no partially buried or bunkered metallic storage tanks.

3.2.6 Inspections and Tests

Visual inspections of aboveground storage containers by facility personnel are performed according to the procedure described in this SPCC Plan. Leaks from container seams, gaskets, rivets, and bolts are promptly corrected. Records of inspections and tests are signed by the inspector and kept at the facility for at least three years.

3.2.7 Heating Coils

Section 40 CFR 112.8(c)(7) does not apply because the facility does not have any heating coils.

3.2.8 Overfill Prevention Systems

All non-portable/non-mobile bulk storage containers must be equipped with overfill protection with one of the following devices is required:

- High liquid level alarms with an audible or visual signal at a constantly attended **operation;**
- High liquid level pump cutoff device set to stop flow at a predetermined container content level;
- Direct audible or code signal communication between the tank gauge and pumping station;
- Fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. With this alternative a person (driver) must be present to monitor gauges and the overfilling of bulk storage containers during delivery.

Exceptions to the aforementioned requirements will apply under this condition: *An environmental equivalency identified based on good engineering practices that is based on the professional judgment of the Professional Engineer who certified the Plan and has given consideration to industry standards.*

All liquid level sensing devices undergo tests to ensure proper operation.

All movements/transfers of oil are manually controlled in the physical presence of a trained employee. All storage containers are situated such that they are in close proximity and view of daily operations conducted by facility employees.

3.2.9 Effluent Treatment Facilities

There are no effluent treatment facilities in operation at the facility.

3.2.10 Visible Discharges

Visible discharges from any container or appurtenance - including seams, gaskets, piping, pumps, valves, rivets, and bolts - are quickly corrected upon discovery. Any accumulation of oil is promptly removed from the secondary containment area.

3.2.11 Mobile and Portable Containers

Any mobile or portable oil storage containers utilized at the facility are positioned so as to prevent spilled oil from reaching navigable waters. Mobile refueling containers do not require sized secondary containment. However, the general secondary containment requirements of 40 CFR 112.?(c), still apply.

3.3 Transfer Operations, Pumping, and In-Plant Processes

Oil-containing piping that is placed out of service or is in standby service for an extended period of time is evacuated of oil and the terminal connection capped or blank flanged and marked as to origin. Oil containing pipe supports are maintained so as to minimize abrasion and corrosion and allow for expansion and contraction. All oil-service valves and piping are subjected to regular examinations by operating personnel at which time the general conditions of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves and metal surfaces are addressed.

PART IV - DISCHARGE RESPONSE

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited. Immediate action will be taken to control, contain, and recover discharged oil. In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, trenches, sandbags, or other material;
- Contact the authorized facility representative or his/her alternate;
- Contact regulatory authorities and the clean-up organization; and
- Collect and dispose of recovered products according to applicable regulations.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released.

A list of emergency contacts is provided in Appendix H and posted at prominent locations throughout the facility. A discharge notification form is provided in Appendix I. A list of discharge response material kept at the facility is included in Appendix J.

4.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., less than 10 gallons of oil);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;

- Discharged oil is not likely to reach water;
- There is minimal risk to human health or safety; and
- There is minimal risk of fire or explosion.

Minor discharges can usually be cleaned up by facility personnel. The following guidelines apply:

- Immediately notify the authorized facility representative.
- Under the direction of the authorized facility representative, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The authorized facility representative will complete the discharge notification form (Appendix I) and attach a copy to this SPCC Plan.
- If the discharge involves more than 25 gallons of oil spill on the ground, the authorized facility representative will contact the Texas Commission on Environmental Quality, Region 10, Beaumont (409-898-3838).

4.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged oil enters a storm drain or other water;
- The discharge requires special equipment or training to clean up;
- The discharged oil poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers will immediately evacuate the discharge site via designated exit routes and move to designated staging areas at a safe distance from the discharge.
- If the authorized facility representative is not present at the facility, the senior on-site person notifies the authorized facility representative of the discharge and has authority to initiate notification and response.

- The authorized facility representative (or senior on-site person) will obtain medical assistance if workers are injured.
- The authorized facility representative (or senior on-site person) will notify the Fire Department and Police Department.
- The authorized facility representative (or senior on-site person) will contact spill response and cleanup contractors.
- The authorized facility representative (or senior on-site person) will immediately contact the Texas Commission on Environmental Quality, Region 10, Beaumont (409-898-3838) and the National Response Center (800-424-8802).
- The authorized facility representative (or senior on-site person) will record the call on the Discharge Notification form in Appendix I and attach a copy to this SPCC Plan.
- The authorized facility representative (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the authorized facility representative is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

4.3 Waste Disposal

Wastes resulting from an oil discharge response will be containerized in impervious bags, drums, or buckets. The authorized facility representative is responsible for ensuring that all wastes are properly characterized for disposal and that all spill-related waste is removed from the facility by a licensed waste hauler. All wastes recovered will be disposed in accordance with applicable regulations.

4.4 Discharge Notification

Any size discharge of oil that affects or threatens to affect navigable waters or adjoining shorelines will be reported immediately to the National Response Center (1-800-424-8802). The NRC is staffed 24 hours a day.

A summary sheet is included in Appendix I to facilitate reporting. The person reporting the discharge will provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Location of the incident;
- Source and cause of the release or discharge;
- Types of material(s) released or discharged;
- Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge;
- Number and types of injuries (if any);
- Media affected or threatened by the discharge (i.e., water, land, air);
- Weather conditions at the incident location;
- Any other information that may help emergency personnel respond to the incident.

Contact information for reporting a discharge to the appropriate authorities is listed in Appendix H and is also posted in prominent locations throughout the facility.

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator and the appropriate state agency in charge of oil pollution control activities (see contact information in Appendix H) whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a

12-month period. The following information will be submitted to the EPA Regional Administrator and to TCEQ within 60 days:

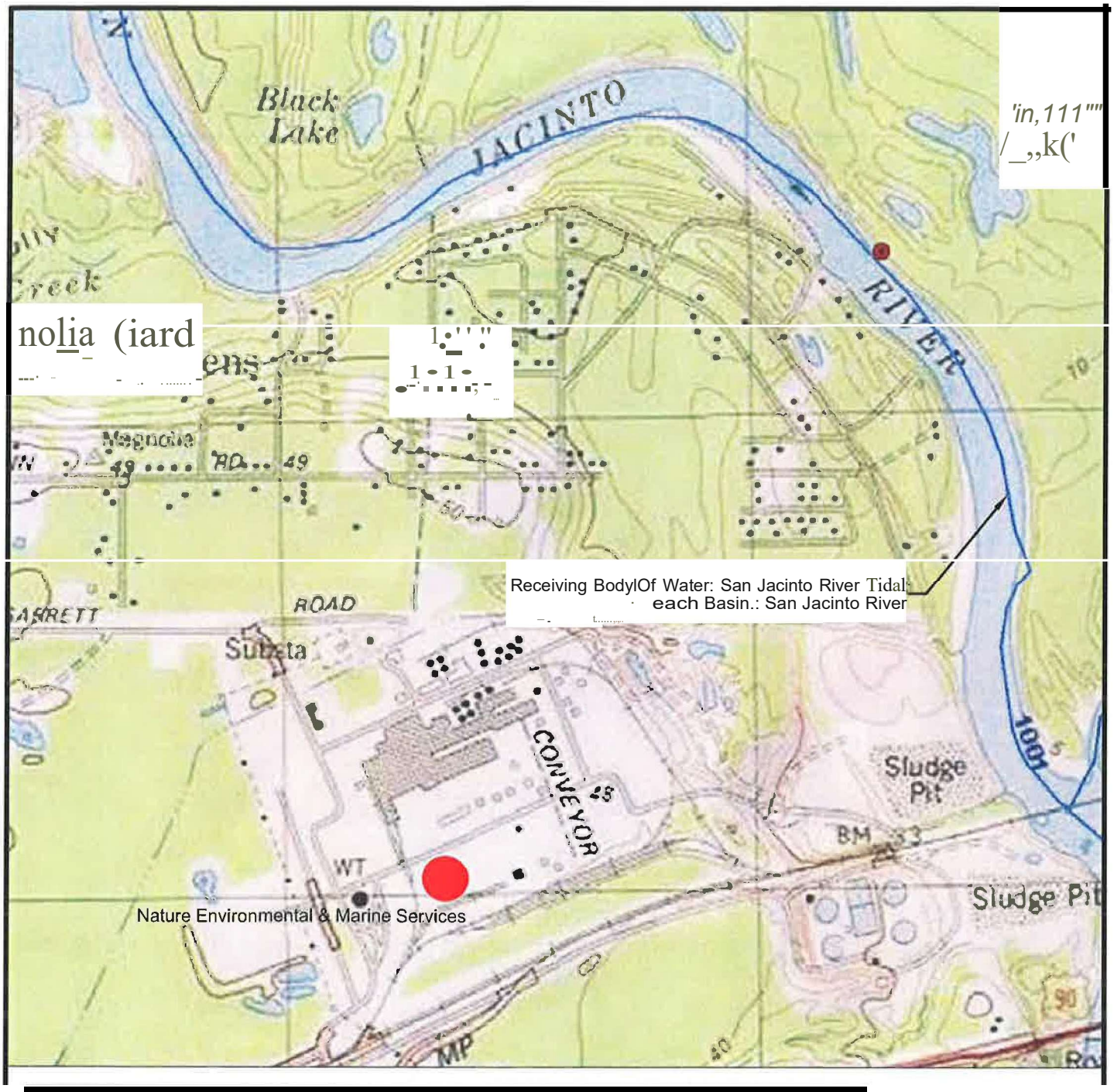
- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective action and Countermeasure taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

A standard report for submitting the information to the EPA Regional Administrator and to TCEQ is included in Appendix I of this Plan.

APPENDIX A:

SITE PLAN AND FACILITY DIAGRAM

FIGURE A-1: SITE PLAN.



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Stale Roule		Woodland	♦ Small Town	+ Hospital
US Highway		Park	◊ City	• Park/Rnervalian
Inter■tale/Limiled Access			♦ Mega City	t· Cemetery
Interstate/Unlimited Accns		Rh•/Canal		
Toll Highway	-++-	RaUroad	... Airport ---	AirOeld

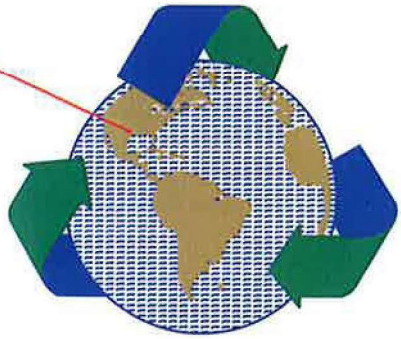
W N E S

Nature Environmental & Marine Services
18511 Beaumont Hwy.
Houston, TX 77049

Prepared By:
MK
Environmental, Inc.
01994 - 2018

Date: 05/29/2018
Drawn B : Nathan Dosher
Visit B : Fidel R. Ru/

Nature Environmental & Marine Services
18511 Beaumont Hwy.
Houston, TX 77049



Prepared By:

MIS
nvtronmental. Inc.
En lro111nental, Occupallanal Health & safety Solullons

FIGURE A-2: FACILITY DIAGRAM

FIGURE A-3: TANK AND CONTAINMENT DETAILS

APPENDIX B:
CERTIFICATION OF SUBSTANTIAL HARM CRITERIA

FACILITY NAME: Nature Environmental and Marine Services, LLC
FACILITY ADDRESS: 18511 Beaumont Hwy, Houston, TX 77049

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 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 is the facility located at a distance (as calculated using the formula in Attachment C-I11, Appendix C, 40 CFR 112 or a comparable formula) such 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, 11, and Ill to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
   YES_ **NO_x_**

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 Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) 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 has the facility experienced a reportable oil spill in an amount greater or equal to 10,000 gallons within the last 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.

Mr. Corneli s Zuyderwijk — CEO

Name — Title

6/7/2019

Signature — Date

APPENDIX C:

FACILITY INSPECTION CHECKLISTS

The following checklists are to be used for monthly and annual facility-conducted inspections. Completed checklists will be signed by the inspector and maintained at the facility, with this SPCC Plan, for at least three years.

(1

Environmental Inc
Environmental Inc
Environmental, Occupational Health II, Safety Solutions

Re!Ji"1rn/ Offices:
Austin, T:X
(512)236-1110
Dallas, T>-'
(214) 388-2272
El PflSO, T.::X
(915) 533-.:2272
McAllen, TX
(956) 682-6898
San Antoni <>, TX
(210) 444-2272

New Orlear1.s, LA
(504) 392-2272

Miami, FL
(305) 520-2272
Jacksonville, FL
(904) 722-2272
Tallahassee, FL
(850) 297-2272
Tampa, FL
(813) 249-2272

Washington,0.C.
(202) 584-2272
New York, NY
(212) 567-2272

Los Angeles, CA
(213) 553-9309

Albuquerque, NM
(505) 254-2272

Date of Inspection:
11/07/2018

Mr. Cornelis Zuyderwijk
CEO
Nature Environmental & Marine Services, LLC
18511 Beaumont Hwy.
Houston, TX 77049

RE: Monthly SPCC Inspection Report for November 2018

Dear Mr. Cornelis Zuyderwijk:

Thank you for your time and cooperation during my recent visit to your facility for the required SPCC inspection. Enclosed is the monthly inspection report (in accordance with the requirements of 40 CFR §112.7 (e)) for the Nature Environmental & Marine Services, LLC facility located at 18511 Beaumont Hwy. for November 2018 conducted by AARC Environmental, Inc. The following report should be signed and inserted into the "Appendix C' of the Spill Prevention Control and Countermeasure (SPCC) Plan.

Comments itemized in the inspection report indicate a non-conformance issue. This indicates that action is required to address a problem. Please review the comments in the monthly inspection checklist and address the issues immediately.

AARC Environmental, Inc. conducts these inspections every month for your facility. If you have any questions, please do not hesitate to call us at (713) 974-2272.

Sincerely

ny Carlton
Anthony Carlton
Environmental Specialist

AARC Environmental Inc
Environmental, Occupational Health & Safety Solutions

Regional Offices:
Austin, TX
(512) 236-1110
Dallas, TX
(214) 388-2272
El Paso, TX
(915) 533-2272
McAllen, TX
(956) 682-6898
San Antonio, TX
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Washington, D.C.
(202) 584-2272
New York, NY
(212) 567-2272

Los Angeles, CA
(213) 553-9309

Albuquerque, NM
(505) 254-2272

Date of Inspection:
10/24/2018

Mr. Cornelis Zuyderwijk
CEO
Nature Environmental & Marine Services, LLC
18511 Beaumont Hwy.
Houston, TX 77049

RE: Monthly SPCC Inspection Report for October 2018

Dear Mr. Comelis Zuyderwijk:

Thank you for your time and cooperation during my recent visit to your facility for the required SPCC inspection. Enclosed is the monthly inspection report (in accordance with the requirements of 40 CFR §112.7 (e)) for the Nature Environmental & Marine Services, LLC facility located at 18511 Beaumont Hwy. for October 2018 conducted by AARC Environmental, Inc. The following report should be signed and inserted into the "Appendix C' of the Spill Prevention Control and Countermeasure *(SPCC)* Plan.

Comments itemized in the inspection report indicate a non-conformance issue. This indicates that action is required to address a problem. Please review the comments in the monthly inspection checklist and address the issues immediately.

AARC Environmental, Inc. conducts these inspections every month for your facility. If you have any questions, please do not hesitate to call us at (713) 974-2272.

Sincerely,

Max Rosenbaum
Environmental Specialist

Environmental Inc
Environmental, Occupallonal Health & Safety Solutions

Regional *C?ffice.\:*
Austin, *TX*
(512) 236-1 110
Dallas, *'TX*
(214) 388-2272
El Paso, TX
(915) 533-2272
McAllen, TX
(956) 682-6898
San Antonio, TX
(210) 444-2272

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New York, NY
(212) 567-2272

Los Angeles, *CA*
(213) 553-9309

Albuquerque, NM
(505) 254-2272

Date oflnspection:
09/24/2018

Mr. Cornelis Zuyderwijk
CEO
Nature Environmental & Marine Services, LLC
18511 Beaumont Hwy.
Houston, TX 77049

RE: Monthly SPCC Inspection Report for September 2018

Dear Mr. Cornelis Zuyderwijk:

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AARC Environmental, Inc. conducts these inspections every month for your facility. If you have any questions, please do not hesitate to call us at (713) 974-2272.

Sincerely,

Anthony Carlton
Environmental Specialist

STI/SPFA SP001 Annual Inspection Checklist

Two Riverway, Suite 1780 • Houston, TX 77056
Toll Free:
Tel: (833) 493-AARC • Fax: (833) 771-AARC

STI SP00l Annual Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ __ Retain until date: _____ _
Inspector Name (print): _____ Title: _____ __
Inspector's Signature _____
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID 1'1umber

Inspection Guidance:

For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.

The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.

Remove promptly standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.

In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).

(*) designates an item in a non-conformance status. This indicates that action is required to address a problem.

Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklists for at least 36 months.

Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.

Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

	Item	Status	Comments/ Date Corrected
	Tank Foundation/Supports		
1	Free of tank settlement or foundation washout?	□Yes □No	
2	Concrete pad or ring wall free of cracking and spalling?	□Yes □No □*NIA*	
3	Tank supports in satisfactory condition?	□Yes □No □*NIA*	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	□Yes □No □*NIA*	
5	Is the grounding strap between the tank and foundation/supports in good condition?	□Yes □No □*NIA*	
	Tank Shell, Heads and Roof		
6	Free of visible signs of coating failure?	□Yes □No	
7	Free of noticeable distortions, buckling, denting, or bulging?	□Yes □No	
8	Free of standing water on roof?	□Yes □No □*NIA*	
9	Are all labels and tags intact and legible?	□Yes □No	
	Tank Manways, Pi i,ing, and Equipment		
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □*NIA*	
	Tank Equipment		
11	Normal and emergency vents free of	□Yes □No	

	Item	Status	Comments / Date Corrected
	obstructions?		
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	□Yes □No □*NIA*	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	□Yes □No □*NIA*	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manwavs).	□Yes □No □*NIA*	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?	□Yes □No □*NIA*	
16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): □ Anti-siphon valve □ Check valve □ Gate valve □ Pressure regulator valve □ Expansion relief valve □ Solenoid valve □ Fire valve □ Shear valve	 □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA*	
17	Are strainers and filters clean and in good condition?	□Yes □No □*NIA*	
	Insulated Tanks		
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	□Yes □No □*NIA*	
19	Insulation free of noticeable areas of moisture?	□Yes □No □*NIA*	
20	Insulation free of mold?	□Yes □No □*NIA*	
21	Free of visible signs of coating failure?	□Yes □No □*NIA*	
	Tank/ Piping Release Detection		
22	Is inventory control being performed and documented if required?	□Yes □No □*NIA*	
23	Is release detection being performed and documented if required?	□Yes □No □*NIA*	
	Other Equipment		
24	Are electrical wiring and boxes in good condition?	□Yes □No □*NIA*	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	□Yes □No □*NIA*	

Additional Comments:

STI SP00l Annual Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____ __
Inspector Name (print): _____ __ Title: _____ __
Inspector's Signature _____
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number]

Inspection Guidance:

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In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).

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Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.

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3	Tank supports in satisfactory condition?	□Yes □No □*NIA*	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	□Yes □No □*NIA*	
5	Is the grounding strap between the tank and foundation/supports in good condition?	□Yes □No □*NIA*	
	Tank Shell, Heads and Roof		
6	Free of visible signs of coating failure?	□Yes □No	
7	Free of noticeable distortions, buckling, denting, or bulging?	□Yes □No	
8	Free of standing water on roof?	□Yes □No □*NIA*	
9	Are all labels and tags intact and legible?	□Yes □No	
	Tank Manwavs, Piping, and Equipment		
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □*NIA*	
	Tank Equipment		
11	Normal and emergency vents free of	□Yes □No	

	Item	Status	Comments / Date Corrected
	obstructions?		
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	□Yes □No □*NIA*	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	□Yes □No □*NIA*	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt man ways).	□Yes □No □*NIA*	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?	□Yes □No □*NIA*	
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17	Are strainers and filters clean and in good condition?	□Yes □No □*NIA*	
	Insulated Tanks		
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	□Yes □No □*NIA*	
19	Insulation free of noticeable areas of moisture?	□Yes □No □*NIA*	
20	Insulation free of mold?	□Yes □No □*NIA*	
21	Free of visible signs of coating failure?	□Yes □No □*NIA*	
	Tank/ Piping Release Detection		
22	Is inventory control being performed and documented if required?	□Yes □No □*NIA*	
23	Is release detection being performed and documented if required?	□Yes □No □*NIA*	
	Other Equipment		
24	Are electrical wiring and boxes in good condition?	□Yes □No □*NIA*	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	□Yes □No □*NIA*	

Additional Comments:

STI SP00l Annual Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC
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8	Free of standing water on roof?	□Yes □No □*NIA*	
9	Are all labels and tags intact and legible?	□Yes □No	
	Tank Manways, Piping, and Equipment		
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □*NIA*	
	Tank Equipment		
11	Normal and emergency vents free of	□Yes □No	

	Item	Status	Comments / Date Corrected
	obstructions?		
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Additional Comments:

STI SP00l Annual Inspection Checklist

General Ins ctio11 Information:

Inspection Date: _____ __ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ __ Title: _____ __
Inspector's Signature _____ __
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID f\Jumber

Inspection Guidance:

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The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.

Remove promptly standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.

In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).

(*) designates an item in a non-conformance status. This indicates that action is required to address a problem.

Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklists for at least 36 months.

Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.

Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

	Item	Status	Comments / Date Corrected
	Tank Foundation/Supports		
1	Free of lank settlement or foundation washout?	□Yes □No	
2	Concrete pad or ring wall free of cracking and spalling?	□Yes □No □*NIA*	
3	Tank supports in satisfactory condition?	□Yes □No □*NIA*	
4	Is water able lo drain away from tank if tank is resting on a foundation or on the ground?	□Yes □No □*NIA*	
5	Is the grounding strap between the tank and foundation/supports in good condition?	□Yes □No □*NIA*	
	Tank Shell, Heads and Roof		
6	Free of visible signs of coaling failure?	□Yes □No	
7	Free of noticeable distortions, buckling, denting, or bulging?	□Yes □No	
8	Free of standing water on roof?	□Yes □No □*NIA*	
9	Are all labels and tags intact and legible?	□Yes □No	
	Tank Manways, Piping, and Equipment		
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □*NIA*	
	Tank Equipment		
11	Normal and emergency vents free of	□Yes □No	

	Item	Status	Comments / Date Corrected
	obstructions?		
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	□Yes □No □*NIA*	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	□Yes □No □*NIA*	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manwavs).	□Yes □No □*NIA*	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?	□Yes □No □*NIA*	
16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): □ Anti-siphon valve □ Check valve □ Gate valve □ Pressure regulator valve □ Expansion relief valve □ Solenoid valve □ Fire valve □ Shear valve	 □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □*NIA*	
17	Are strainers and filters clean and in good condition?	□Yes □No □*NIA*	
	Insulated Tanks		
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	□Yes □No □*NIA*	
19	Insulation free of noticeable areas of moisture?	□Yes □No □*NIA*	
20	Insulation free of mold?	□Yes □No □*NIA*	
21	Free of visible signs of coating failure?	□Yes □No □*NIA*	
	Tank/ Piping Release Detection		
22	Is inventory control being performed and documented if required?	□Yes □No □*NIA*	
23	Is release detection being performed and documented if required?	□Yes □No □*NIA*	
	Other Equipment		
24	Are electrical wiring and boxes in good condition?	□Yes □No □*NIA*	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	□Yes □No □*NIA*	

Additional Comments:

STI SP001 Annual Inspection Checklist

General In ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.

The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.

Remove promptly standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.

In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.S(c)(S)(v)).

(*) designates an item in a non-conformance status. This indicates that action is required to address a problem.

Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklists for at least 36 months.

Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.

Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

	Item	Status	Comments / Date Corrected
	Tank Foundation/Suooorts		
1	Free of tank settlement or foundation washout?	□Yes □No	
2	Concrete pad or ring wall free of cracking and spalling?	□Yes □No □*N/A*	
3	Tank supports in satisfactory condition?	□Yes □No □*N/A*	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	□Yes □No □*N/A*	
5	Is the grounding strap between the lank and foundation/supports in good condition?	□Yes □No □*N/A*	
	Tank Shell, Heads and Roof		
6	Free of visible signs of coating failure?	□Yes □No	
7	Free of noticeable distortions, buckling, denting, or bulging?	□Yes □No	
8	Free of standing water on roof?	□Yes □No □*N/A*	
9	Are all labels and tags intact and legible?	□Yes □No	
	Tank Manways, Piping, and Equipment		
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	□Yes □No □*N/A*	
	Tank Equipment		
11	Normal and emergency vents free of	□Yes □No	

	Item	Status	Comments / Date Corrected
	obstructions?		
1'.2	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	□Yes □No □N/A	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	□Yes □No □N/A	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	□Yes □No □N/A	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?	□Yes □No □N/A	
16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): o Anti-siphon valve o Check valve o Gate *valve* □ Pressure regulator valve o Expansion relief valve o Solenoid valve □ Fire valve o Shear valve	 □Yes □No oN/A □Yes □No oN/A □Yes □No □N/A □Yes □No □N/A □Yes □No □N/A □Yes □No □*NIA* □Yes □No □*NIA* □Yes □No □N/A	
17	Are strainers and filters clean and in good condition?	□Yes □No □*NIA*	
	Insulated Tanks		
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	□Yes □No □N/A	
19	Insulation free of noticeable areas of moisture?	□Yes □No □N/A	
20	Insulation free of mold?	□Yes □No □*NIA*	
21	Free of visible signs of coaling failure?	□Yes □No □N/A	
	Tank/ Piping Release Detection		
22	Is inventory control being performed and documented if required?	□Yes □No □*NIA*	
23	Is release detection being performed and documented if required?	□Yes □No □N/A	
	Other Equipment		
24	Are electrical wiring and boxes in good condition?	□Yes □No □*NIA*	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	□Yes □No □*NIA*	

Additional Comments:

STI/SPFA SP001 Monthly Inspection Checklist

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP001 Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
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Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", idenlifiJ tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? ***Note:*** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ __ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ __ Title: _____ __
Inspector's Signature _____
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Numbe

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identifiJ tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	*ls* the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? ***Note:*** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	*ls* the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. *ls* the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	*ls* the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP001 Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
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Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", idenliftJ lank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in e:ood workine: condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □***NIA***	
	Equipment on tank		
7	If overfill equipment has a "test" button, does **it** activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □***NIA***	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments/ Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? ***Note:*** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ectfon Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
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Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? ***Note:*** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior **larger** than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □***NIA***	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____ __
Inspector's Signature _____ __
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

Monthly Checklist

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identifiJ location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____ __
Inspector Name (print): _____ __ Title: _____ __
Inspector's Signature _____ __
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID /\Jumber

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	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of waler or has another preventative measure been taken? **NOTE:** Refer lo paragraphs 6.10and 6.11 of the standard for alternatives for Category 1 tanks. *NI*A is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if ii is found. If lank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
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The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
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Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind stonns) or maintenance (such as coating) that could affect the operation of critical components (nonnal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in !?ood workin!? condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank vroduct is found, investi!?ate vossible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, revlace batterv if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? ***Note:*** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP001 Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ __ Retain until date: _____
Inspector Name (print): _____ __ Title: _____
Inspector's Signature _____ __
Tank(s) inspected ID _____ __
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary lank free of waler or has another preventative measure been taken? **NOTE:** Refer lo paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □***NIA***	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical lest mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", idenlifiJ location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP001 Monthly Inspection Checklist

General Ins ection Information:

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

Inspector Name (print): _____ Title: _____

Inspector's Signature _____

Tank(s) inspected ID _____

Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.

For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.

The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.

Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.

Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklists for at least 36 months.

After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", idenlifiJ lank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □NIA	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □NIA	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments/ Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NJA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identify location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ction Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

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	Item	Status	Comments / Date Corrected
	Tank and Piping		
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. *NIA* is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Equipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □N/A	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? *Note: If "No", identifiJ location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI SP00l Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable) Nature Environmental & Marine Services, LLC [ID Number

Inspection Guidance:

Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
Retain the completed checklists for at least 36 months.
After severe weather (snow, ice, wind storms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

	Item	Status	Comments / Date Corrected
	Tank and Piping		
I	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? **Note:** If *"No", identify tank and describe leak and actions taken.*	□Yes □No	
2	Is the tank liquid level gauge legible and in good working condition?	□Yes □No □*NIA*	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	□Yes □No	
4	Is the primary tank free of water or has another preventative measure been taken? **NOTE:** Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	□Yes □No □*NIA*	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	□Yes □No □*NIA*	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	□Yes □No □*NIA*	
	Eauipment on tank		
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	□Yes □No □*NIA*	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the	□Yes □No □*NIA*	

	Item	Status	Comments / Date Corrected
	mechanism to confirm operation.		
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	□Yes □No □*NIA*	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? **Note:** *If "No", identifiJ location and describe leak.*	□Yes □No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	□Yes □No □*NIA*	
	Containment		
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	□Yes □No □*NIA*	
13	Are dike drain valves closed and in good working condition?	□Yes □No □*NIA*	
14	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	
	Concrete Exterior AST (CE-AST)		
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	□Yes □No □*NIA*	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	□Yes □No □*NIA*	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	□Yes □No □*NIA*	
	Other Conditions		
17	Is the system free of any other conditions that need to be addressed for continued safe operation?	□Yes □No	

Additional Comments:

STI/SPFA SP001 Portable Container Monthly Inspection Checklist

STI SP00l Portable Container Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____
Inspector Name (print): _____ Title: _____
Inspector's Signature _____
Tank(s) inspected ID _____
Regulatory facility name and ID number (if applicable)Nature Environmental & Marine Services, LLC
[ID r--Jumber

Inspection Guidance:

This periodic inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Note the non-conformance and corresponding corrective action in the comment section.

Retain the completed checklists for at least 36 months.

	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", identifiJ container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

Portable Container Checklist

STI SP00l Portable Container Monthly Inspection Checklist

General Ins ection Information:

Inspection Date: _____ Prior Inspection Date: _____ Retain until date: _____ _
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ID Number

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	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", idenlifiJ container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

STI SP00l Portable Container Monthly Inspection Checklist

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2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No oN/A	□Yes □No oN/A	□Yes □No oN/A	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	□Yes □No oN/A	□Yes □No oN/A	□Yes □No oN/A	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", identify container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

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	Portable Container Containment/Storage Area				
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2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? *Note: If "No", identifiJ container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

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	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
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	Container				
5	Is the container free of leaks? *Note: If "No", idenlifiJ container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

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	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
3	Are drain valves closed and in good working condition?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
	Container				
5	Is the container free of leaks? *Note: If "No", identify container and describe leak.*	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
6	Is the container free of distortions, buckling, denting or bulging?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

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	Portable Container Containment/Storage Area				
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3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", identify container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

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	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
4	Are containment egress pathways clear and any gales/doors operable?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", idenlifiJ container and describe leak.*	□Yes □No	□Yes □No	□Yes □No	□Yes □No
6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

STI SP00l Portable Container Monthly Inspection Checklist

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Regulatory facility name and ID number (if applicable)Nature Environmental & Marine Services, LLC
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	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
3	Are drain valves closed and in good working condition?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
4	Are containment egress pathways clear and anv gates/doors operable?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", identifiJ container and describe leak.*	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
6	Is the container free of distortions, buckling, denting or bulging?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

Additional Comments:

STI SP00l Portable Container Monthly Inspection Checklist

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	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	□Yes □No	□Yes □No	□Yes □No	□Yes □No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
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6	Is the container free of distortions, buckling, denting or bulging?	□Yes □No	□Yes □No	□Yes □No	□Yes □No

Additional Comments:

STI SP00l Portable Container Monthly Inspection Checklist

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	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
3	Are drain valves closed and in good working condition?	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*	□Yes □No □*NIA*
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Additional Comments:

STI SP00l Portable Container Monthly Inspection Checklist

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	Item	Area:	Area:	Area:	Area:
	Portable Container Containment/Storage Area				
1	Are all portable container(s) within designated storage area?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
2	Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
3	Are drain valves closed and in good working condition?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
4	Are containment egress pathways clear and any gates/doors operable?	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*	☐Yes ☐No ☐*NIA*
	Container				
5	Is the container free of leaks? Note: *If "No", idenlifiJ container and describe leak.*	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No
6	Is the container free of distortions, buckling, denting or bulging?	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No	☐Yes ☐No

Additional Comments:

APPENDIX D:

RECORD OF CONTAINMENT DRAINAGE

This record must be completed when rainwater from diked areas is drained into a storm drain or into an open watercourse, lake, or pond, and bypasses the water treatment system. The bypass valve must normally be sealed in closed position and opened and resealed following drainage under responsible supervision. Records are maintained with the SPCC Plan at the office located at 18511 Beaumont Hwy, Houston, TX 77049.

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 | 2 | 3 | 4 | 5 | 6]	Visible Sheen [Yes | No]	Start Time [hh:mm AMIPM]	End Time [hh:mm AMIPM]	Signature
12-18-18	101 (1,192.5)	No	08:00	08:30	
12-19-18	104 (1,192.5)	Yes	10:00	13:00	VD
12-19-18	2090 (1,192.5)	Yes	10:00	13:00	VD
12-19-19	Blue Frac	Yes	12:00	14:00	VD
2-1-19	Frac 181	NO	9:00	12:30	VD
2-1-19	Frac 104	NO	9:00	12:30	VD

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment t1 I 2 I 3 I 4 I s I 61	Visible Sheen [Yes I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 I 2 I 3 I 4 I S I 61	Visible Sheen [Yes I Nol	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 I 2 I 3 I 4 I S I 61	Visible Sheen [Yes I Nol	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 I 2 I 3 I 4 I S I 61	Visible Sheen rves I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 I 2 I 3 I 4 I S I 61	Visible Sheen [Yes I Nol	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment [1 I 2 I 3 I 4 I S I 61	Visible Sheen [Yes I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment (11213141516)	Visible Sheen [Yes I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment c1 i2i3 i4 i5 i61	Visible Sheen rves I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

Record of Containment Drainage

Nature Environmental and Marine Services, LLC

Date	Containment C1 I2 I3 I4 I S I 61	Visible Sheen rves I No]	Start Time [hh:mm **AMIPM]**	End Time [hh:mm **AMIPM]**	Signature

APPENDIX E:
RECORD OF ANNUAL DISCHARGE PREVENTION BRIEFINGS AND TRAINING

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	OJN
Instructor(s):	
Date:	

Employees in Attendance	Signature

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor{s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor(s):	
Date:	

Employees in Attendance	**Signature**

Annual Discharge Prevention Briefings and Training Log

Nature Environmental and Marine Services, LLC

Type of Briefing:	
Instructor{s}:	
Date:	

Employees in Attendance	**Signature**

APPENDIX F:

VOLUME REQUIRED OF SECONDARY CONTAINMENT

For Tank T-1:

Determination of volume of Containment, C-1

Length (ft) = 52.5 (ft)

Width (ft) = 12.5 (ft)

Height (ft) = 1.17 (ft)

$Vc._1$ = Length x Width x Height

= **52.5** (ft) x **12.5** (ft) x **1.17** (ft)= **768 (ft3)**

$Vc._1$ = 768 (ft^3) X 7.48 = 5,745 gal

Tank T-1 is a Dragon design frac tank with a volume of 500 barrels (bbl)

$Vr._1$ = 500 bbl x 42 gal/bbl = 21,000 gallons

For Tank measurements please see drawings in Appendix A, Figure A-3.

The existing secondary containment C-1 volume is insufficient to contain the capacity of the largest single container (T-1) including sufficient freeboard to contain precipitation. Within three months of the implementation of this plan the facility must provide secondary containment sufficient to hold the full capacity of T-1 and sufficient freeboard to contain precipitation. Once provided Nature Environmental and Marine Services, LLC must keep the secondary containment clear of debris. The facility must ensure that the secondary containment system must be free of cracks, holes, or gaps and be sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed. T-1 is located outside so the owner or operator needs to provide extra volume for a freeboard of 9.9 inches.

The existing secondary containment C-1 is sufficient to contain the capacity of the largest single container (T-1) including sufficient freeboard to contain precipitation.

Precipitation for 25-year, 24-hour event in Harris County		= 9.9 (in)
Freeboard, FB	= 9.9 (in)/ 12 (in/ft)	= 0.825 (ft)
Freeboard Volume, **VFs**	= **52.5 (ft)** x **12.5** (ft) x **0.825** (ft)	= 541 (ft3)
	= 541 (ft3) x 7.48 (gal/ ft3)	= 4,047 (gal)
Required secondary containment volume $V_{Req.\ sc}$	= $V_{TANKT-1}$ + VFB	
	= 21,000 + 4,047	= 25,047 (gal)

Leaving the same dimensions for length and width the additional volume means that the secondary containment must be at least 5'-2" height. The owner or operator need to discuss options with the PE in order to comply with the SPCC regulations.

The facility has made a written commitment to have manpower, equipment, and materials available to the facility to respond to a release. During the time until adequate secondary containment is provided, the facility must deploy active secondary containment.

For Tank T-2:

Determination of volume of Containment, C-2

Length (ft) = 52.5 (ft)

Width (ft) = 12.5 (ft)

Height (ft) = 1.17 (ft)

Vc-2 = Length x Width x Height

= 52.5 (ft) x 12.5 (ft) x 1.17 (ft) = 768 (ft3)

Vc-2= 768 (ft^3) X 7.48 = 5,745 gal

Tank T-2 is a Dragon design frac tank with a volume of 500 barrels (bbl)

$V_{r.2}$ = 500 bbl x 42 gal/bbl = 21,000 gallons

For Tank measurements please see drawings in Appendix A, Figure A-3.

The existing secondary containment C-2 volume is insufficient to contain the capacity of the largest single container (T-2) including sufficient freeboard to contain precipitation. Within three months of the implementation of this plan the facility must provide secondary containment sufficient to hold the full capacity of T-2 and sufficient freeboard to contain precipitation. Once provided Nature Environmental and Marine Services, LLC must keep the secondary containment clear of debris. The facility must ensure that the secondary containment system must be free of cracks, holes, or gaps and be sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed. T-2 is located outside so the owner or operator needs to provide extra volume for a freeboard of 9.9 inches.

Precipitation for 25-year, 24-hour event in Harris County		= 9.9 (in)
Freeboard, FB	= 9.9 (in)/ 12 (in/ft)	= 0.825 (ft)
Freeboard Volume, **VFe**	: 52.5 (ft) x 12.5 (ft) x 0.825 (ft)	= 541 (ft3)
	= 541 (ft3) x 7.48 (gal/ ft3)	= 4,047 (gal)

Required secondary containment volume $V_{Req.\ sc}$	= $V_{TANK\ T\text{-}1} + V_{FB}$	
	= 21,000 + 4,047	= 25,047 (gal)

Leaving the same dimensions for length and width the additional volume means that the secondary containment must be at least 5'-2" height. The owner or operator need to discuss options with the PE in order to comply with the SPCC regulations.

The facility has made a written commitment to have manpower, equipment, and materials available to the facility to respond to a release. During the time until adequate secondary containment is provided, the facility must deploy active secondary containment.

For Tank T-3:

Determination of volume of Containment, C-3

Length (ft) = 19.083 (ft)

Width (ft) = 18.67 (ft)

Height (ft) = 0.458 (ft)

Vc.3 = Length x Width x Height

= 19.083 (ft) x 18.67 (ft) x 0.458 (ft) = 163 (ft3)

$Vc._3$= 163 (ft^3) X 7.48 = 1,219 gal

The design of the secondary containment has a ramp that must be deducted from the secondary containment volume. The ramp is a right triangle with the following dimensions:

Height = 5.5" = 0.458'

Length = 50" = 4.17'

Width = 10'

Area of a right triangle = ½(L)(H) = ½ x 4.17 x 0.458 = 0.95 ft2

Volume = Area x W = 0.95 ft2 x 10 ft= 9.5 ft^3

= 9.5 ft3 x 7.48 gal/ft^3

= 71 gal

Volume available = 1,219 gal - 71 gal = 1,148 gal

Determination of volume of Tank T-4 (Using dimensions assuming shell capacity unknown), Vr.3

Tank Radius (ft) = Diameter / 2

= 2 (ft)/ 2

= 1 (ft)

$Vr._3$ = TT x $Radius^2$ (ft) x Tank Length (ft)

= TT x 1^2 $(ft)^2$ x 2.875 (ft) = 9 (ft^3)

$Vr.3 = 9\ (ft^3) \times 7.48\ gal/ft3 = 67$ gallons

Drums are filled usually 80% of the capacity, so 67 x 0.80 = 54 gallons

The existing secondary containment is greater than the capacity of the tank. Freeboard precipitation is not considered into account since the tanks is located indoors.

Nature Environmental and Marine Services, LLC has prepared this oil spill contingency plan and a written commitment to have manpower, equipment and materials available to the facility to respond to a release as described in 40 CFR 112.7(k)(2). Nature Environmental and Marine Services, LLC must periodically inspect the tank (as described in Sections 2.7) and ensure good housekeeping practices (including but not limited to those described in Appendix L) are used during routine maintenance activities. Nature Environmental and Marine Services, LLC must also ensure that oil from these units are managed and disposed following all regulatory requirements.

APPENDIX G:

RECORDS OF TANK INTEGRITY AND PRESSURE TESTS

Attach copies of official records of tank integrity and pressure tests.

APPENDIX H:

EMERGENCY CONTACTS

Designated person responsible for spill prevention: ***Mr. Cornelius Zuyderwijk***
CEO
936-444-5079 (Facility)

EMERGENCY TELEPHONE NUMBERS:

Facility Sudhakar Yenumula VP	434-825-4858
operation manager Joseph Rozema	361-446-8929
Joel Curl	281-330-7543
Nona Walker Compliance	936-553-7349
Local Emergency Response	
Emergency	911
Notifications	
Texas Commission on Environmental Quality (TCEQ) Texas Commission on Environmental Quality, Region 10	(800) 832-8224 409-898-3838
U.S. Environmental Protection Agency EPA, Region 6	866-372-9378
National Response Center	800-424-8802
State Emergency Response Committee (SERC)	(800) 832-8224
Local Emergency Planning Committee (LEPC)	409-832-8757

APPENDIX I:

DISCHARGE NOTIFICATION FORM

The SPCC Coordinator is responsible for ensuring that spills of the reportable quantity or more of any of the following types of oil spills present at the facility are reported to the State Emergency Response Commission (SERC) and, if the spill reaches surface water, the National Response Center (NRC) and the Local Emergency Planning Committee (LEPC) within 24 hours of the time the spill is discovered:

Oil Spill Reportable Quantities

Type of Oil	Reportable Quantity Spilled on Land	Reportable Quantity Spilled on Surface Water
Diesel	25 Gallons	Causes Sheen
Used Oil	25 Gallons	Causes Sheen
Motor Oil	25 Gallons	Causes Sheen
Miscellaneous Oils	25 Gallons	Causes Sheen

1. Materials other than oil may require reporting, however only oil spills are addressed in this SPCC Plan.
2. Reportable quantity applies even if the spill is contained by a secondary containment structure (State of Texas requirement; Not reportable to the NRC).
3. Spills to surface water (includes offsite ditches and storm sewers that discharge offsite) must be reported to the NRC and the LEPC in addition to the SERC.

EMERGENCY TELEPHONE NUMBERS:

Local Emergency Response	
Emergency	911
Notifications	
Texas Commission on Environmental Quality (TCEQ) Texas Commission on Environmental Quality, Region 10	(800) 832-8224 409-898-3838
U.S. Environmental Protection Agency EPA, Region 6	866-372-9378
National Response Center	800-424-8802
State Emergency Response Committee (SERC)	(800) 832-8224
Local Emergency Planning Committee (LEPC)	409-832-8757

Discharge Notification Form

*** Notification must not be delayed if information or individuals are not available. Additional pages may be attached to supplement information contained in the form.

Facility name: Nature Environmental and Marine Services, LLC
18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
ReportinQ Individual	Name:	Tel.#:
Location of discharge	Latitude: LonQitude:	Description:
Equipment source	Piping Unknown D FlowlineD Stack, flare 0 AST/UST 0 Other*	Description: Equipment ID:
Product	U Crude oil D Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D MotorOil D Hydraulic Oil D Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium 8	Released: D water** D land air other (describe):	Recovered: D Release confined to company property. 0 Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurrina		
Safety issues	L J Injuries l J Fatalities L J Evacuation	

Notifications		
Aaencv	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency PlanninQ Committee		
Oil spill removal organization/Cleanup contractor		

Discharge Notification Form

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Facility name: Nature Environmental and Marine Services, **LLC**
18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reoortinq Individual	Name:	Tel.#:
Location of discharge	Latitude: Longitude:	Description:
Equipment source	0 D Piping ☐ Unknown D Flowline D Stack, flare 0 D AST/UST Other*	Description: Equipment ID:
Product	[:J Crude oil D Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D MotorOil 0 Hydraulic Oil 0 Other*	* Describe other:
Appearance and description		
Environmental conditions	Wihd direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: ☐ water** D land air ☐ other (describe):	Recovered: D Release confined to company property. D Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		
Safety issues	L J Injuries L J Fatalities L J Evacuation	
Notifications		
Agency	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency Planning Committee		
Oil spill removal organization/Cleanup contractor		

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Location of discharge	Latitude: Longitude:	Description:
Equipment source	0 D Piping ☐ Unknown D Flowline D Stack, flare 0 AST/UST ii Other*	Description: Equipment ID:
Product	U Crude oil D Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D MotorOil 0 Hydraulic Oil D Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: B water** D land air ☐ other (describe):	Recovered: D Release confined to company property. D Release outside company property. ** If water, indicate extent and body of water:
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Safetv issues	I I Iniuries I I Fatalities I I Evacuation	

Notifications		
Agency	**Name**	**Date/time reported & Comments**
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National Response Center 1-800-424-8802		
State police		
Local Emergency Planning Committee		
Oil spill removal organization/Cleanup contractor		

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18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name:	Tel.#:
Location of discharge	Latitude: Longitude:	Description:
Equipment source	Piping LJ Unknown 0 FlowlineO Stack, flare 0 AST/UST 0 Other*	Description: Equipment ID:
Product	D Crude oil 0 Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D MotorOil 0 Hydraulic Oil 0 Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Imoacts		
Quantity Receiving medium	Released: B ".ater** D land air 0 other (describe):	Recovered: 0 Release confined to company property. 0 Release outside company property. ** If water, indicate extent and body of water:
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Safety issues	I I Injuries I I Fatalities I I Evacuation	
Notifications		
Aaency	**Name**	**Date/time reported & Comments**
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National Response Center 1-800-424-8802		
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Oil spill removal organization/Cleanup contractor		

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18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reoortinq Individual	Name:	Tel.#:
Location of discharge	Latitude: Lonaitude:	Description:
Equipment source	0 Piping ☐ Unknown B FlowlineO Stack, flare B AST/UST B Other*	Description: Equipment ID:
Product	L.J Crude oil 0 Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D MotorOil ☐ Hydraulic Oil D Other*	• Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind soeed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: 0 water** D land Dair 0 other (describe):	Recovered: 0 Release confined to company property. 0 Release outside company property. ** If water, indicate extent and body of water:
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Safetv issues	I I Iniuries I I Fatalities I I Evacuation	

Notifications		
Agency	**Name**	**Date/time reported & Comments**
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18511 Beaumont Hwy, Houston, TX 77049

Descriotion of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name:	Tel.#:
Location of discharge	Latitude: Lonuitude: ☐	Description:
Equipment source	Piping Flow line AST/UST Other* Unknown Stack, flare	Description: Equipment ID:
Product	Crude oil Diesel/Gasoline AV Gas/Jet Fuel Used Oil MotorOil Hydraulic Oil Other..	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Imoacts		
Quantity Receiving medium	Released: water** land air other (describe):	Recovered: Release confined to company property. Release outside company property. ... If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
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Safety issues	I J Inillries I I Fatalities I J Evacuation	
Notifications		
Agency	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
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Oil spill removal organization/Cleanup contractor		

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Facility name: Nature Environmental and Marine Services, **LLC**
18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name:	Tel.#:
Location of discharge	Latitude: LonQitude:	Description:
Equipment source	☐ Piping ☐ Unknown ☐ FlowlineD Stack, flare ☐ AST/UST ☐ Other*	Description: Equipment ID:
Product	☐ Crude oil ☐ Diesel/Gasoline ☐ AV Gas/Jet Fuel ☐ Used Oil ☐ Motor Oil ☐ Hydraulic Oil ☐ Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: ☐ water** ☐ land ☐ air ☐ other (describe):	Recovered: ☐ Release confined to company property. ☐ Release outside company property. ** If water, indicate extent and body of water:
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Aaencv	**Name**	**Date/time reported & Comments**
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Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reoorting Individual	Name:	Tel.#:
Location of discharge	Latitude: LonQitude:	Description:
Equipment source	LJ Piping LJ Unknown 0 FlowlineO Stack, flare 0 AST/UST 0 Other*	Description: Equipment ID:
Product	U Crude oil 0 Diesel/Gasoline D AV Gas/Jet Fuel 0 Used Oil D Motor Oil 0 Hydraulic Oil D Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: ☐ water** D land air ☐ other (describe):	Recovered: D Release confined to company property. D Release outside company property. ** If water, indicate extent and body of water:
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Notifications		
Aaencv	**Name**	**Date/time reoorted & Comments**
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Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
ReoortinQ Individual	Name:	Tel.#:
Location of discharge	Latitude: Lonaitude:	Description:
Equipment source	U Piping Unknown D FlowlineO Stack, flare 0 AST/UST n Other*	Description: Equipment ID:
Product	[J Crude oil D Diesel/Gasoline D AV Gas/Jet Fuel D Used Oil D Motor Oil 0 Hydraulic Oil D Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Imoacts		
Quantity Receiving medium	Released: 0 water** D land Dair D other (describe):	Recovered: D Release confined to company property. DRelease outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		
Safetv issues	I I Injuries I I Fatalities LI Evacuation	

Notifications		
Aaencv	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency Planninq Committee		
Oil spill removal organization/Cleanup contractor		

Discharge Notification Form

*** Notification must not be delayed if information or individuals are not available. Additional pages may be attached to supplement information contained in the form.

Facility name: Nature Environmental and Marine Services, **LLC**
18511 Beaumont Hwy, Houston, TX 77049

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reoortinq Individual	Name:	Tel.#:
Location of discharge	Latitude: Lonaitude: _	Description:
Equipment source	U Piping Unknown D FlowlineO Stack, flare D AST/UST D Other*	Description: Equipment ID:
Product	U Crude oil 0 Diesel/Gasoline D **AV** Gas/Jet Fuel 0 Used Oil D MotorOil D Hydraulic Oil D Other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity Receiving medium	Released: D water** D land Dair D other (describe):	Recovered: D Release confined to company property. D Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		
Safety issues	I I Injuries I I Fatalities I J Evacuation	

Notifications		
Aaencv	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency Planninq Committee		
Oil spill removal organization/Cleanup contractor		

APPENDIX J:

DISCHARGE RESPONSE EQUIPMENT INVENTORY

The facility is recommended to maintain various 95 - Gallon Spill Kit and will have the following inventory. The equipment inventory is verified during the monthly inspection and must be replenished as needed.

Item	Quantity
Pads 18"x 18"	100
Pillows, 17.5"x 17.5"	25
Dikes/Socks, 3" -cp and x 4'-long	15
Dikes/Socks, 3"-cp and 8'-long	10
Silver Shield Gloves, Size L	2 Pair
Nitrile Gloves, Size 10	2 Pair
Goggles	2 Pair
Tychem QC Coveralls.XL	2
Floor-Stand Spill Sign	1
Haz-Mat Disposal Bags 33"x 60"	6
Spill Response Pocket Guide	1
Safety and Compliance Directory	1
DOT Emergency Response Guidebook	1
DOT Label Pkg.	1

APPENDIX K:

SDS

1. Identification

Product Name: Produced Water, Sweet or Sour

Synonyms: Fomiation Water, Salt Water, H2O, Oily Water; Sweet and Sour
Product Use: Water extracted from oil or natural gas well production, process stream, waste

EP Energy
1001 Louisiana Street
Houston, Texas 77002

Infomiation: (713) 997-1000 or 855-269-0826
O'BRIEN'S: (985) 781-0804 24/7

2. Hazard(s) Identification

Note: This material has not been tested by EP Energy to determine its specific health hazards. Therefore, the infomiation provided in this section includes health hazard information on the product components.

GHS Classifications

H226: Flammable liquid & vapour
H350: Carcinogenicity, Category 1
H320: Eye Irritant, Category 2B
H315: Skin Irritant, Category 2

GHS Label Elements

Signal Word: Danger

GHS Hazard Statements

May contain or release poisonous hydrogen sulfide gas
H226: Flammable liquid & vapour
H350: May cause cancer.
H320: Causes eye irritation.
H315: Causes skin irritation.
Hazards Not Otherwise Classified

PrecautionaryStatement(s)

Prevention:

P201: Obtain special instructions before use.
P202: Do not handle until all safety precautions have been read and understood.
P210: Keep away from heat/sparks/open flames/hot surfaces - no smoking.
P270: Do not eat, drink or smoke when using this product.
P281: Use personal protective equipment as required.
P264: Wash thoroughly after handling.
P280: Wear protective gloves/protective clothing/eye protection/face protection.

Response:

P308+P313: IF exposed or concerned: Get medical advice/attention.
P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do. Continue rinsing.
P337+P313: If eye irritation persists: Get medical advice/attention.
P302+P352: IF ON SKIN: Wash with plenty of soap and water.
P332+P313: If skin irritation occurs: Get medical advice/attention.
P362: Take off contaminated clothing and wash before reuse.
P370: In case offire: Usedry chemical, carbon dioxide, or foam for extinguishing.

Storage:

P405: Store locked up.

Disposal:
P501: Dispose of contents/container in accordance with local/regional/national/international regulations.

3. Composition/Information on Ingredients

Note: Composition will vary with geographic location, geologic formation, temperature and pressure.

Components	CAS No.	Wt%('!
Water	Mixture	>68
Mineral Varietyl,i	Varies	<32
Crude Oil (Petroleum}	8002-05-9	<1
Benzene	71-43-2	<1
Hydrogen Sulfide	7783-06-4	Varies

('!Normal composition ranges are shown. Exceptions may occur depending upon the source of the produced water.
(2lActual composition is unknown, but may contain Sodium Chloride (CAS No. 7647-14-5), Potassium Chloride (CAS No. 7447-40-7) and/or Calcium Chloride (CAS No. 10043-52-4)

4. First-Aid Measures

Inhalation: If respiratory symptoms develop, move victim to fresh air. Seek immediate medical attention if symptoms persist. If breathing has stopped and airway is clear, provide artificial respiration. Do not use mouth-to-mouth method if victim ingested the substance. Provide artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device. Administer oxygen if breathing is difficult, if qualified. Seek immediate medical attention.

Skin Contact: Remove and isolate contaminated clothing and shoes. Wash affected areas with soap and water. If irritation persists, seek medical attention. Decontaminate clothing before reuse.

Eye Contact: Flush eyes with large amounts of water for at least 15 minutes, occasionally lifting the eyelids. Seek medical attention.

Ingestion: DO NOT INDUCE VOMITING. If spontaneous vomiting occurs, place on the left side with head down to prevent aspiration of liquid into the lungs. Have exposed individual rinse mouth thoroughly with water. Never give anything by mouth to an unconscious person. Do not leave victim unattended. Monitor for breathing difficulties. Seek immediate medical attention.

Notes to Physician: This material may contain or liberate hydrogen sulfide. In high doses, hydrogen sulfide may produce pulmonary edema and respiratory depression or paralysis.

5. Fire-Fighting Measures

NFPA Ratings: Health: 1 Flammability: 1 Reactivity: 0

General Fire Hazards:
Flammable. Fire is associated with crude oil and natural gas liquids floating on surface of produced water and their vapors. May be ignited by heat, sparks or flames or other sources of ignition. Vapors may reach an ignition source, and flashback. Runoff to sewer may create fire or explosion hazard downstream from the source. Gases may form explosive mixtures with air. BLEVE'S (Boiling Liquid Expanding Vapor Explosions) can occur when a liquid in a pressurized container is heated to temperatures beyond its boiling point. This can lead to failure of the container and damage to the surrounding area. May react with strong oxidizing materials and a wide variety of chemicals.

Hazardous combustion/decomposition products may include carbon monoxide, carbon dioxide, hydrocarbons, nitrogen oxides and sulfur oxides. Hydrogen sulfide may be present. Downwind personnel must be evacuated.

Extinguishing Media:
Dry chemical, foam, carbon dioxide or water spray. Carbon dioxide can displace oxygen. Use caution when applying carbon dioxide in confined spaces.

Unsuitable extinguishing media: Do not use a solid water stream. Water and foam should not be used together on the same surface as water destroys the foam. Water should be used as a spray to keep surrounding areas cool.

Fire Fighting Instructions:
Move containers from fire area if you can do it without risk. Use a smothering technique for extinguishing fire. Do not use a forced- water stream as this will scatter the fire. Use a water spray to cool fire-exposed containers and surrounding areas until well after fire is out. Do not direct water at source of leak or safety devices as icing may occur. Dike fire-control water for later disposal; do not scatter the material. Firefighters

should wear self-contained breathing apparatus and full protective clothing. Refer to Section 8 for appropriate PPE selection.

Precautions for Fire Involving Tanks or Car/Trailer Loads:
Always stay away from tanks engulfed in flame. Fight fire from maximum distance or use unmanned hose holders or monitor nozzles. Cool containers with flooding quantities of water until well after fire is out. Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank. If unmanned hose holders or monitor nozzles cannot be used, withdraw from area and let fire burn.

6. Accidental Release Measures

Personal Precautions:
Extremely Flammable. Spillage of liquid product will create a fire hazard and may fom, an explosive atmosphere. Keep all sources of ignition and hot metal surfaces away from spill/release. The use of explosion-proof electrical equipment is recommended. Product may contain or release poisonous hydrogen sulfide gas. Provide sufficient ventilation in the affected area(s) and wear appropriate personal protective equipment as indicated in Section 8 when handling spill material.

Environmental Precautions:
Stop the leak if it can be done without risk. Prevent spilled material from entering waterways, sewers, basements or confined areas. Contain release to prevent further contamination of soils, surface water or groundwater. Clean up spill as soon as possible using appropriate techniques such as applying non-combustible absorbent materials or vacuuming. All equipment used when handling the product must be grounded. A vapor suppressing foam may be used to reduce vapors. Use clean nonsparking tools to collect absorbed material. Where feasible and appropriate, remove contaminated soil.

Methods for Containment and Clean Up:
Immediate cleanup of any spill is recommended. Build dike or use other appropriate spill response methods far ahead of spill for containment and later recovery or disposal of spilled material. Absorb spill with inert material and place in suitable container for disposal. If spilled on water, remove with appropriate equipment such as skimmers, booms or absorbents. In case of soil contamination, remove contaminated soil for remediation or disposal in accordance with applicable regulations.

Reporting:
Report spills/releases as required, to appropriate local, state and federal authorities. US Coast Guard and Environmental Protection Agency regulations require immediate reporting of spills/release that could reach any waterway. Report spill/release to the National Response Center at (800) 424-8802. In case of accident or road spill, notify Chemtrec at (800) 424-9300.

7. Handling and Storage

Handle in accordance with good industrial hygiene and safety practices. These practices include, but are not limited to, avoiding unnecessary exposure and prompt removal of material from eyes, skin, and clothing. If needed, take first aid actions as indicated in Section 4.

Precautions for Safe Handling:
Handle as a flammable liquid. Keep away from heat, sparks and open flame. No smoking. Use only with adequate ventilation. May release or contain dangerous levels of H_2S. Use only with adequate ventilation. Wear appropriate personal protective equipment and use exposure controls as indicated in Section 8. Vent slowly to the atmosphere when opening. Avoid all contact with skin and eyes. Avoid breathing product dust or vapors. Use explosion-proof electrical (ventilating, lighting and material handling) equipment. Non-sparking tools should be used. Ground and bond all transfer and storage equipment to prevent static sparks and equip with self-closing valves, pressure vacuum bungs and flame arrestors. Review all operations which have the potential of generating and accumulating electrostatic charge and/or flammable atmosphere. Use appropriate mitigating procedures. Do not enter confined spaces without following proper entry procedures. Remove contaminated clothing immediately. Wash with soap and water after working with this product.

Scales, deposits and sludge from equipment associated with this product may have accumulation of Naturally Occurring Radioactive Materials (NORM). Equipment should be assessed for external gamma radiation.

Conditions for Safe Storage:
Keep away from flame, sparks, excessive temperatures and open flame. No smoking. Maintain vessels closed and clearly labeled. Empty vessels may contain explosive vapors. Do not pressurize, cut, heat, weld or expose these vessels to sources of ignition. This material may contain or release H_2S. In a tank or other closed container, the vapor space above this material may accumulate hazardous concentrations of H_2S. Do not enter confined spaces without following proper entry procedures. Use appropriate containment to avoid environmental contamination.

Incompatibilities:
Keep away from strong oxidizers, ignition sources and heat.

8. Exposure Controls/Personal Protection

Components	CAS No.	Wt%(')	Occupational Exposure Limits			Units
			OSHA<11	ACGIH<1J	NIOSH(Zj	
Crude Oil (Petroleum)	8002-05-9	<1	500 ppm	N/A	350 mg/m^3	–
Benzene	71-43-2	<1	1 5 srEL	0.5'J1 2·5 sTEL	0.1 1 STEL	ppm
Hydrogen Sulfide	7783-06-4	<1	2ot.,;e111ng	5 11::L	10 <.;eilmg	ppm

(1)8-hour TWA unless otherwise specified.
(2)10-hour TWA unless otherwise specified.
(3)ACGIH has established a Biological Exposure Index (BEi) for this substance.
N/A: Not Applicable
STEL: 15-minute Short Temi Exposure Limit
Ceiling: Concentration not to be exceeded at any time

Engineering Controls:
Provide adequate general and local exhaust ventilation to: (1) Maintain airborne chemical concentrations below applicable exposure limits, (2) Prevent accumulation of flammable vapors and fomiation of explosive atmospheres, and (3) Prevent formation of oxygen deficient atmospheres, especially in confined spaces.

Eye Protection:
Safety glasses are required standard PPE. Face shields are required when working with pressurized lines. Wear chemical goggles when working with liquid natural gas.

Skin Protection:
Fire Resistant Clothing (FRC) is required standard PPE. Insulated clothing and/or gloves should be worn where liquid or expanding gas may be generated.

Respiratory Protection:
A NIOSH-approved respirator must be worn where controls do not maintain airborne concentrations below occupational exposure limits. Positive-pressure, Full-face, self-contained breathing apparatus (SCBA) should be available for emergency use. H2S MAY BE PRESENT OR RELEASED. NIOSH-approved respiratory protection should be used when handling crude of high or unknown hydrogen sulfide content and to reduce airborne concentrations to allowable occupational exposure levels.

Work/Hygiene Practices:
Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Flammable Properties:
Flash Point: Varies widely depending on hydrocarbon content
Flammable Limits in Air, % by Volume:
Lower (LFL): 4.0 % Upper(UFL): 46.0 %
Auto-ignition Temperature: Not available

Values given are typical of similar products. There are no test results for this mixture.

Appearance:	Clear or opaque liquid	**% Volatile by Volume:**	Negligible
Odor:	Slightly hydrocarbon/rotten eggs	**Viscosity:**	Not available
Boiling Point:	Varies widely depending on hydrocarbon content	**Melting Point:**	Not available
Freezing Point:	< 32 °F	**Vapor Density (Air= 1):**	> 1
Vapor Pressure:	Not available	**pH:**	Not available
Solubility in H_20:	Not available	**Evaporation Rate:**	Not available
Specific Gravity@ 68 °F & 1 atm:	> 1	**Molecular Wt.:**	Not available

10. Stability and Reactivity

Chemical Stability:
Stable under anticipated conditions of use and nomial temperature conditions.

Conditions to Avoid/Incompatibilities:
Strong oxidizing agents, strong reducing agents, chlorine, fluorine, bromine and metal catalysts, heat, sparks, flame and build-up of static electricity,

Hazardous Decomposition Products:
Not anticipated under normal conditions of use. Combustion of H2S creates sulfur dioxide.

Hazardous Polymerization:
Not known to occur.

11. Toxicological Information

Tox1co omca data does not exist or this mixture.

Acute Toxicity	Hazard	Additional Information	LC50/LD50 Data
Inhalation	Unlikely to be harmful poisonous hvdroaen sulfide qas	May contain or release	>5 mg/L (mist.estimated)
Skin Absorption	Unlikely to be harmful		> 2 g/kg (estimated}
Ingestion (Swallowing)	Unlikely to be harmful		> 5 g/kg (estimated)

Aspiration Hazard: Not expected to be an aspiration hazard.

Skin Corrosion/Irritation: Not expected to be irritating,

Serious Eye Damage/Irritation: Not expected to be irritating.

Signs and Symptoms: No known effects of overexposure.

Skin Sensitization: Not expected to be a skin sensitizer.

Respiratory Sensitization: No information available on the mixture, however none of the components have been classified for respiratory sensitization (or are below the concentration threshold for classification).

Specific Target Organ Toxicity (Single Exposure): Not expected to cause organ effects from single exposure.

Specific Target Organ Toxicity (Repeated Exposure): Not expected to cause organ effects from repeated exposure.

Carcinogenicity: May cause cancer.

Germ Cell Mutagenicity: Not expected to cause heritable genetic effects.

Reproductive Toxicity: Not expected to cause reproductive toxicity.

Other Comments: This material may contain or liberate hydrogen sulfide, a poisonous gas with the smell of rotten eggs. The smell disappears rapidly because of olfactory fatigue so odor may not be a reliable indicator of exposure. Effects of overexposure include irritation of the eyes, nose, throat and respiratory tract, blurred vision, photophobia (sensitivity to light), and pulmonary edema (fluid accumulation in the lungs). Severe exposures can result in nausea, vomiting, muscle weakness or cramps, headache, disorientation and other signs of nervous system depression, irregular heartbeats, convulsions, respiratory failure, and death.

Information on Toxicological Effects of Components

Crude Oil (Petroleum)

Carcinogenicity: Chronic application of crude oil to mouse skin resulted in an increased incidence of skin tumors. IARC concluded in its Crude Oil Monograph that there is limited evidence of carcinogenicity in animals, and that crude oil is not classifiable as to its carcinogenicity in humans (Group 3). It has not been listed as a carcinogen by NTP or OSHA.

Target Organs: Laboratory animal studies of crude oil by the dermal and inhalation exposure routes have demonstrated toxicity to the liver, blood, spleen and thymus.

Reproductive Toxicity: Dermal exposure to crude oil during pregnancy resulted in limited evidence of developmental toxicity in laboratory animals. Decreased fetal weight and increased resorptions were noted at maternally toxic doses. No significant effects on pup growth or other developmental landmarks were observed postnatally.

BENZENE: This product may contain benzene, which can cause degeneration in blood forming bone marrow leading to anemia which may further degrade to leukemia, a type of cancer. Acute benzene poisoning causes central nervous system depression. Chronic exposure affects the hematopoietic system causing blood disorders including anemia and pancytopenia. Mutagenic and clastogenic in mammalian and non-mammalian test systems. Reproductive or developmental toxicant only at doses that are maternally toxic, based on tests with animals.

HYDROGEN SULFIDE: This product may contain or release hydrogen sulfide, which may be fatal if inhaled. Greater than 15-20 ppm continuous exposure can cause mucous membrane and respiratory tract irritation. 50-500 ppm can cause headache, nausea, dizziness, loss of reasoning and balance, difficulty breathing, fluid in the lungs and possible loss of consciousness. Greater than 500 ppm can cause rapid or immediate unconsciousness due to respiratory paralysis and death by suffocation unless removed from exposure and successfully resuscitated. Inhalation of a single breath at a concentration of 1000 ppm (0.1%) can cause immediate unconsciousness and death. Hydrogen sulfide is corrosive when moist. Skin contact may cause bums. There is a rapid loss of sense of smell on exposure to gas concentrations above 50 ppm. At high concentrations, individuals may not even recognize the odor before becoming unconscious.

Carcinogenicity:

Component (CAS No.)	ACGIH[1,1]	IARC Monographs[121]	US NTP	OSHA Regulated
Benzene (71-43-2)	A1	1	Yes	Yes

([1]ACGIH Carcinogens: A1 = Confirmed human carcinogen, A2 = Suspected human carcinogen, A3 = Confirmed animal carcinogen with unknown relevance to humans, A4 = Not classifiable as a human carcinogen, A5 = Not suspected as a human carcinogen
[121]IARC Monographs: 1 = Carcinogenic to humans, 2A = Probably carcinogenic to humans, 2B = Possibly carcinogenic to humans, 3 = Not classifiable as to carcinogenicity to humans, 4 = Probably not carcinogenic to humans

12. Ecological Information

Keep out of sewers, drainage areas, and waterways. Report spills and releases, as applicable, under Federal and State regulations. May be hazardous to waterways/wildlife.

13. Disposal Information

Do not dispose of waste into sewer. Do not allow this material to drain into sewers/water supplies. If discarded, this material may meet the criteria of being an "ignitable" waste. If hydrogen sulfide and/or benzene are present in the waste, the waste may be considered a hazardous U-listed waste. Under RCRA, it is the responsibility of the user to determine, at the time of disposal, if the material meets federal, state, or local criteria to be defined as a hazardous waste.

14. Transport Information

UN/Identification No: UN 1993
Proper Shipping Name: Flammable Liquid, n.o.s
Hazard Class: 3
Packing Group: II
ERG#: 128

15. Regulatory Information

Section 302 EPCRA Extremely Haza,rdous Substances (EHS):

Product Component	GAS *No.*	*Wt%*	*RQ, lb*	*TPQ, lb*
None				

Section 304 CERCLA Hazardous Substances:

Product Component	GAS *No.*	*Wl%*	*RQ, lb*
Benzene	71-43-2	<1	10
Hydrogen Sulfide	7783-06-4	<1	100

Section 3111312 Hazard Categorization:

Acute:	*Chronic:*	*Fire:*	*Pressure:*	*Reactive:*
Yes	Yes	Yes	Yes	No

Section 313 EPCRA Toxic Substanc1 s:

Ingredient	GAS *No.*	*Wt.%*
Benzene	71-43-2	<1
Hydrogen Sulfide	7783-06-4	<1

EPATSCA

All components are either on the U.S. EPA TSCA Inventory List, or are not regulated under TSCA.

Key **RQ** = Reportable Quantity
TPQ = Threshold Planning Quantity of EHS

CALIFORNIA PROPOSITION 65 WARNING

Chemicals known to the State of California to cause cancer, birth defects, or other reproductive harm may be found in crude oil and petroleum products. Although it is possible to sufficiently refine a crude oil or its end products to remove the potential for cancer, we are advising that one or more of the listed chemicals may be present in some detectable quantities. Read and follow directions and use care when handling crude oil and petroleum products.

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16. Other Information

Date Prepared: 03/07/2006, **Last Revision:** 06/01/2015

THIS INFORMATION RELATES ONLY TO THE SPECIFIC MATERIAL DESIGNATED AND MAY NOT BE VALID FOR SUCH MATERIAL USED IN COMBINATION WITH ANY OTHER MATERIALS OR IN ANY PROCESS. SUCH INFORMATION IS TO THE BEST OF THIS COMPANY'S KNOWLEDGE AND BELIEVED ACCURATE AND RELIABLE AS OF THE DATE INDICATED. HOWEVER, NO REPRESENTATION, WARRANTY OR GUARANTEE IS MADE AS TO THE ACCURACY, RELIABILITY OR COMPLETENESS. IT IS THE USER'S RESPONSIBILITY TO SATISFY THEMSELVES AS TO THE SUITABILITY AND COMPLETENESS OF SUCH INFORMATION FOR THEIR OWN PARTICULAR USE.

Key/Legend:
ACGIH -American Conference of Governmental Industrial Hygienists
ADR - Agreement on Dangerous Goods by Road
CAA - Clean Air Act
GAS - Chemical Abstracts Service Registry Number
CDG - Carriage of Dangerous Goods By Road and Rail Manual
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act
CFR - Code of Federal Regulations
CNS - Central Nervous System
EINECS - European Inventory of Existing Chemical Substances Registry Number
ERG - Emergency Response Guidebook
EPCRA - Emergency Planning and Community Right-to-Know Act
GHS - Globally Harmonized System of Classification and Labeling of Chemicals
IARC - International Agency for Research on Cancer
IATA - International Air Transport Association
ICAO - International Civil Aviation Organization
IMDG - International Maritime Dangerous Goods Code
IMO - International Maritime Organization
MSDS - Material Safety Data Sheet
N/E - Not Established
NTP - National Toxicology Program
OSHA - Occupational Safety and Health Administration
PEL - Permissible Exposure Limit
PPE - Personal Protective Equipment
RCRA - Resource Conversation and Recovery Act
RID - Regulations Concerning the International Transport of Dangerous Goods by Rail
RQ - Reportable Quantities
SARA - Superfund Amendments and Reauthorization Act of 1986
SDS - Safety Data Sheet
TCC -Tag Closed Cup
TDG - Transportation of Dangerous Goods
TLV - Threshold Limit Value
TSCA - Toxic Substance Control Act
UN/NA - United Nations / North American Number
UNECE - United Nations Economic Commission for Europe
US DOT - United States Department of Transportation
US EPA - United States Environmental Protection Agency
Vol. -Volume
WHMIS - Workplace Hazardous Materials Information System

This is the end of MSDS A0133.sds

APPENDIX L:
OIL TRANSFER GUIDANCE

Transferring any oil to/from a tank presents the highest level of interaction between the oil storage tanks and facility or contractor personnel. Since there is a higher probability for spills to occur during oil transfers, the following spill prevention procedures are recommended:

- Prior to transferring any oil into a tank, the person transferring the oil will make sure that the available volume of the tank is greater than the amount of oil that will be transferred to the tank. [Best Management Practice]
- During the entire time that oil is being transferred to a tank, the person transferring the oil must be a qualified person who is alert and continually monitors the transfer process with an unobstructed view at a maximum of 25 feet from the cargo tank. [49 CFR 177.834 (i)(3)]
- A person is qualified if he has been made aware of the hazardous material which is to be loaded or unloaded; he has been instructed on the procedures to be followed in emergencies; he is authorized to move the cargo tank; and he has the means to do so. [49 CFR 177.834 (i)(4)]
- Tank level gauges, if present, will be continuously monitored during oil transfers. [Best Management Practice]
- No smoking is allowed within 25 feet of an oil storage or transfer area during transfers. [49 CFR 177.834 (c)]
- No fire, open flames or welding is allowed within 25 feet of an oil storage and transfer area during transfers. [49 CFR 177.834 (d)]
- The hand brake must be engaged and the wheels chocked on any vehicle that is transferring oil or receiving oil. [49 CFR 177.834 (e)]
- Do not use tools that are likely to damage the ability of a valve on an oil storage tank to close. [49 CFR 177.834 (f)]

- After transferring oil, any manholes and valves associated with an oil storage tank and a cargo tank motor vehicle will be closed, secured and free from leaks. [49 CFR 177.834 (j)]
- Warning signs will be in-place that warn personnel not to move oil transfer vehicles until all transfer lines have been completely disconnected. (40 CFR 1122.7 (e)(l)]
- Prior to the departure of an oil transfer vehicle, the lower most outlets of the vehicle will be examined for leakage and, if necessary, tightened, adjusted or replaced to prevent leakage of oil. [40 CFR 1122.7 (h)(3)]
- During oil transfer, all associated equipment will be properly grounded to prevent sparking from the discharge of static electricity built up within the oil transfer line. (49 CFR 177.837 (b)]
- Contractors retained to transfer oil at this facility will be apprised of their responsibility for oil spill prevention and, if necessary, oil spill response during such transfers. [Best Management Practice]

APPENDIX M:

DEFINITIONS

Aboveground Storage Tank (AST) - A tank or container designed to operate at pressures ranging from atmospheric pressure through a gauge pressure of one psig measured at the top of the tank. The tank may be sitting on the ground or set on supports such as saddles, skids or legs, etc., and may be installed in a vault. Included are shop-fabricated tanks, field-erected tanks, and portable containers.

Bulk Storage Container: any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. From §112.1(d)(2)(ii) "only containers of oil with a capacity of 55 gallons or greater are counted" toward the 1,320-gallon threshold. The threshold applies to storage capacity contained in operating equipment as well as to storage capacity in containers (see page 47044 of the July 17, 2002 Federal Register).

Capacity- The amount of liquid that the AST is capable of holding. The capacity of a compartment in a multi-compartmented AST shall be considered a separate and distinct capacity, provided that the bulkhead between compartments is fully welded around its perimeter and compartments are not manifolded. The capacity of an AST shall be determined by one of the following sources:

- A label on the AST that indicates its capacity;
- AST documentation, such as drawings or packing lists;
- Consulting the tank manufacturer, if known; OR
- Measuring the AST to determine its capacity. In the case of double-wall tanks, the dimensions of the inner tank will determine the capacity.

Completed Buried Tank: any container completely below grade and covered with earth, sand, gravel, asphalt or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered above ground storage containers.

Discharge: includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deep water Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act)

OW: Double walled.

Facility: any mobile or fixed onshore or offshore building, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations ... oil storage, oil gathering, oil processing, oil transfer, oil distribution, and waste treatment, or in which oil is used. The boundaries of a facility depend on several site-specific factors, including, but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and the types of activity at the site.

MPC: motive power containers means any onboard bulk storage container used primarily to power the movement of a motor vehicle, or ancillary onboard oil-filled operational equipment. An onboard bulk storage container which is used to store or transfer oil for further distribution is not a motive power container. The definition of motive power container does not include oil drilling or workover equipment, including rigs.

OFOE: means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including

pump jack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

Oil: oil of any kind or in any form, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Onshore Facility: any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

Owner or Operator: any person owning or operating an onshore facility.

Permanently closed: any container or facility for which:

1. All the liquid and sludge has been removed from the container and connecting line; and
2. All connecting pipes and lines have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stated that it is a permanently closed container and noting the date of such closure.

SPCC Plan: the document required by 40 CFR 112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

DEFINITIONS PER STI/SPFA SP001 STANDARD (INSPECTION OF ABOVEGROUND STORAGE TANKS)

CERTIFIED INSPECTOR -A tank inspector who meets the certification requirements identified in Section 4.2 of the STI/SPFA Standard.

COATING FAILURE - Significant peeling, cracking, spalling, blistering, pitting, chipping, etc. of the coating, paint or lining on an AST, resulting in the exposure of the metal surface and corrosion of the tank shell.

CONCRETE EXTERIOR ABOVEGROUND STORAGE TANK (CE-AST) - A shop-fabricated aboveground storage tank that includes a concrete exterior. A CE-AST with a UL 2085 label has integral secondary containment that allows monitoring for leakage in the interstice between the primary tank and the secondary containment.

CONTINUOUS RELEASE DETECTION METHOD (CRDM): A means of detecting a release of liquid through inherent design. CROM is passive because it does not require sensors or power to operate. Liquid releases are visually detected by facility operators (See Appendix A of the STI/SPFA Standard for additional information). The system shall be designed in accordance with good engineering practice. Several acceptable and commonly used CROM systems are:

- Release prevention barrier (RPB) (described in definition of "Release prevention barrier")
- Double-wall AST or double-bottom AST
- Elevated AST, with or without release prevention barrier
- Steel diked AST, open or closed top
- Concrete exterior AST (CE-AST) with an integral secondary containment and interstitial monitoring opening

CONNECTION - A method or fitting for fastening a pipe to the AST or an appurtenance. Examples are flanges, pipe threads, pipe welds, expansion joints, and flexible fittings.

CORROSION RATE - The rate of degradation of a material due to a chemical reaction with its environment.

DOUBLE-BOTTOM AST - An AST with a bottom plate integral to the primary container and a second bottom plate designed to provide an interstice. The interstice allows testing of both bottoms for tightness, or monitoring for leakage into the space.

DOUBLE-WALL AST - An AST manufactured as a tank-within-a-tank. The second tank provides integral secondary containment. An interstitial space between the two tanks is formed, which allows testing of both tanks for tightness, as well as monitoring for leakage into the space.

DYE PENETRANT TESTING (DT) - a method for nondestructively testing the surface of a material. A liquid dye is applied to the surface and excess is removed. A developing solution is then applied which indicates cracks in the material.

ELEVATED AST-An AST, which is not in contact with the ground, and which is raised above the surface of the ground or bottom of a vault using tank supports. An elevated AST allows for a visual, external inspection of the bottom of the tank.

FIELD-ERECTED AST: a welded metal AST erected on-site where it will be used. For the purpose of this standard, ASTs meeting either of the following descriptions are to be inspected as field-erected ASTs:

a. The AST's nameplate (or other identifying means, such as accurate drawings) indicates that it is a field-erected AST with a maximum shell height of 50 feet (15.24 meters) and a maximum diameter of 30 feet (9.14 meters).

b. The AST has no nameplate (or other identifying means such as accurate drawings), and is more than 75,000 U.S. gallons (283,906 liters) with a maximum shell height of 50 feet (15.24 meters) and a maximum diameter of 30 feet (9.14 meters).

FORMAL EXTERNAL INSPECTION (FEI): a documented external inspection conducted by a certified inspector to assess the condition of the AST and determine its suitability for continued service without entry into the AST interior.

FORMAL INTERNAL INSPECTION (FIi): a documented internal inspection conducted by a Certified Inspector to assess the internal and external condition of the AST and determine its suitability for continued service. A FIi includes the inspection requirements of a FEI, therefore, a FIi satisfies the requirements of a FEI and shall be considered equivalent to or better than a FEI for the purposes of inspection scheduling. Requires entry into the AST interior following emptying and cleaning. See Section 3 for guidance on cleaning and entry safety considerations.

INSPECTION PLAN - A written plan developed by the owner/operator, Certified Inspector or a Professional Engineer that details the inspection requirements for a facility.

INTERSTICE - In a double-wall AST, the space between the primary tank and secondary tank; in a double-bottom AST, the space or void between the two bottoms. This space may be open or closed to the atmosphere and may be monitored or tested by vacuum or leak detection equipment or by visual inspection.

INITIAL SERVICE DATE - The date on which liquid was first placed in the AST.

LEAK TESTING METHOD (LTM): a point-in-time test method to determine if an AST is liquid-tight. Leak testing is not preventive: it provides an indication only of whether the AST's integrity has already been breached. Therefore, it may only be used as a tank

integrity measure or as a supplement to other inspection procedures. LTMs may include the following technologies:

1. Gas pressure decay (includes vacuum decay)
2. Gas pressure soap bubble testing
3. Gas tracers (e.g., helium tracer)
4. Soil tracers (chemical marker)
5. Mass measurement
6. Level measurement
7. Hydrostatic test

LOCKOUTITAGOUT - A procedure for affixing lockout or tagout devices to energy-isolating equipment and otherwise disabling machines or equipment to prevent unexpected energization, startup, or release of stored energy. The intent of the procedure is to prevent injury to employees and to comply with the following Occupational Safety & Health Administration (OSHA) regulations or their equivalent:

- 29 CFR Part 1910.147, *The Control of Hazardous Energy (Lockout/Tagout)*
- 29 CFR Part 1910.333, *Electrical Lockout/Tagout*
- 1926.1200 Subpart AA Confined Space in Construction

MAGNETIC FLUX LEAKAGE (MFL) - A method used to nondestructively inspect ferromagnetic materials, such as a carbon steel floor plate. A magnetic field is applied to steel to near-saturation, so that it cannot hold any additional field. In the presence of a flaw (wall thinning), some of the magnetic flux escapes or "leaks" into the surrounding environment, where magnetic sensors detect it and qualitatively report a flaw signal. This method is commonly used on AST floors (MFL floor scan) to determine the underside condition of the tank floor.

MAGNETIC PARTICLE TESTING {MT)-A method used to nondestructively inspect ferromagnetic materials, such as a carbon steel. It is used for detecting surface and

subsurface linear discontinuities by inducing a magnetic field into the material and applying iron oxide particles.

MANWAY -An opening designed to allow personnel entry into an AST.

MICROBIAL-INFLUENCED/INDUCED CORROSION (MIC) - Corrosion caused or accelerated by certain microbes. Depending on the type of bacteria, the degree of microbial activity, and the thickness and type of AST material, MIC is characterized by a high rate of corrosion. It sometimes penetrates tank walls and bottoms in two years or less. It is typically characterized by a ring-like pattern of crater-shaped or channel-like penetrations.

NONDESTRUCTIVE TESTING (NDT) - The development and application of technical methods to examine materials and/or components in ways that do not impair future usefulness and serviceability, in order to detect, locate, measure, interpret, and evaluate flaws.

OVERFILL PREVENTION - Systems, procedures or devices used to prevent liquid in ASTs from running over or spilling out of the AST during the filling process. A person who is physically present and in control of a shutoff device during the entire tank filling process is an acceptable procedure to achieve overfill prevention.

OWNER - The legal entity having control and responsibility for the operation of the existing AST and storage facilities.

OWNER'S INSPECTOR - The owner or owner's designee responsible for conducting owner's periodic AST inspections.

PERIODIC AST INSPECTION - A visual, documented inspection conducted by an owner's inspector to assess the AST's general condition without suspending AST operations or removing the AST from service.

PORTABLE CONTAINER - A closed AST having a liquid capacity equal to or greater than 55 U.S. gallons and not intended for fixed installation. This definition does not include a mobile storage container on a vehicle, or one being towed, that is used to store and transport liquids for transfer into or from vehicles, mobile equipment, or another storage container. This definition also does not include storage containers used for onboard propulsion of a vehicle.

PRIMARY TANK- The tank in direct contact with the liquid stored.

PROFESSIONAL ENGINEER (PE) - A person who has fulfilled specific education and/or experience requirements under state licensure laws and has received a license to practice engineering.

RELEASE PREVENTION BARRIER (RPB) - A liquid containment barrier that is installed under the AST. Its purpose is to divert leaks toward the perimeter of the AST where they can be easily detected, as well as to prevent liquid from contaminating the environment. RPBs are composed of materials compatible with the liquid stored in the AST and meet appropriate engineering standards. Examples are steel (as in steel double-bottom tanks), concrete, elastomeric liners, or other suitable materials, provided the above criteria are met.

REMOTE IMPOUNDING - A spill control system that uses a sloped spillway or drainage system to channel liquid releases away from an AST to a contained collection area that is remote from important facilities, adjoining property, or waterways. The containment area is sized for the capacity of the largest AST, plus sufficient freeboard to allow for

precipitation. For the purposes of this Standard, remote impounding is equivalent to secondary containment. Remote impounding is further defined in NFPA 30.

SECONDARY CONTAINMENT DIKE/BERM -A spill control system consisting of walls and a floor completely surrounding single or multiple ASTs. It provides a secondary means of containment for the entire capacity of the largest single AST, plus sufficient freeboard to contain precipitation and the displacement volume present below the dike wall of other ASTs in the containment area. The secondary containment dike/berm is to be constructed according to accepted good engineering practices. (Note: See NFPA 30, 40 CFR Part 112, and/or other local requirements for additional requirements.)

SECONDARY CONTAINMENT SYSTEM - Provides a secondary means of containment for the entire volumetric capacity of the largest single AST within a dike/berm plus sufficient freeboard to contain precipitation. The secondary containment system is to be designed to contain a spill until it can be discovered and cleaned up. It must be constructed according to accepted good engineering practices. (Note: See NFPA 30 and/or 40 CFR Part 112, and/or other local requirements for additional requirements.)

STEEL DIKED AST - An AST with an integral steel secondary containment dike. These dikes may be pans, boxes, or containers, and are designed to contain the contents of the primary tank if it fails. A steel diked AST may be open or closed to the atmosphere. Closed-top steel dike ASTs have welded covers or movable rain shields to keep precipitation from collecting in the dike, but open-top dike ASTs do not have such covers. The secondary containment of steel diked ASTs must be sized to contain the primary tank volume, plus sufficient freeboard to contain precipitation as necessary.

SECONDARY TANK -The outer wall of a double-wall AST.

SHELL - For the purposes of this Standard, the AST shell includes the roof, bottom, head, and wall of the AST. Refer to Appendix A of the STI/SPFA Standard for more information.

SHOP-FABRICATED AST-A welded carbon steel or stainless steel AST fabricated in a manufacturing facility or an AST not otherwise identified as field-erected, with a volume less than or equal to 75,000 U.S. gallons (283,906 liters).

SINGLE-WALL AST - An AST with only one wall or shell.

SPILL CONTROL - A means of preventing a release of liquid to the environment, including adjoining property and waterways. Spill control methods include:

- Remote impounding
- Secondary containment system
- Secondary containment dike/berm
- Open top steel diked AST
- Closed top steel diked AST with overfill prevention
- Double-wall AST with overfill prevention
- CE-AST with overfill prevention

SUITABILITY FOR CONTINUED SERVICE - The determination that an AST's condition is adequate for continued use, based on the criteria presented in this Standard.

TANK SUPPORTS - Structures designed to elevate an AST above the ground. These include saddles, skids, beams, legs, and similar structures.

TELLTALE HOLE OR OPENING- An opening in a reinforcing plate that allows for leak monitoring where a tank penetration hole in the shell has been reinforced with a welded reinforcing plate.

THERMOPLASTIC - substances, such as asphalt cement, that are solid at ambient temperature and become molten upon heating. The application of this Standard is for thermoplastics stored in a liquid form.

ULTRASONIC TESTING SCAN (UTS) - An ultrasonic scan to evaluate the corrosion on the opposite side of the inspection surface using an ultrasonic flaw detector. This inspection is to be performed by an NOT examiner certified in accordance with ASNT-TC-1A (or equivalent), per paragraph 4.3.2 of the STI/SPFA Standard.

ULTRASONIC THICKNESS TESTING (UTT) - A point thickness reading taken by a competent person, per paragraph 4.3.3 of the STI/SPFA Standard, utilizing a digital ultrasonic thickness meter.

VACUUM BOX EXAMINATION (VB)-A weld-testing method used to check for leaks in the welds of the shell of an AST.

APPENDIX 5.
NATURE ENVIRONMENTAL CONTINGENCY PLAN

Nature Environmental & Marine Services, LLC
Houston Facility
18511 Beaumont Highway
Houston, Texas 77049

"General Facility Standards and Contingency Plan"

Revised 2020

General Facility Standards §279.52

(a) ***Preparedness and Prevention***

Owners and operators of used oil processing and re-refining facilities must comply with the following requirements:

(1) ***Maintenance and Operation of Facility***

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water which could threaten human health or the environment.

(2) ***Required Equipment***

All facilities must be equipped with the following, unless none of the hazards posed by used oil handled at the facility could require a particular kind of equipment specified in paragraphs (a)(2)(i) through (iv) of this section.

(i) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel. (Supervisors and Operators are equipped with hand-held cell phones.).

(ii) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or Local Emergency Response Teams. (Supervisors and Operators are equipped with hand-held cell phones.).

(iii) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, Inert gas, or dry chemicals), spill control equipment and decontamination equipment. (Total seven 20-pound Portable fire extinguishers are located 1 at frac tank farm and 6 various places in the warehouse locations in the oil area.)

(iv) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems. (Fire hose near the frack tank farm and fire hydrant 110 feet away and fire station is 2.3 miles away)

(3) ***Testing and Maintenance of Equipment***

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested, and maintained as necessary to assure its proper operation in time of emergency. (Facility communication cell phones are tested daily. Fire protection equipment is tested or checked periodically as Spill control and decontamination equipment are checked periodically.)

(4) ***Access to Communications or Alarm System***

Whenever used oil is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required in Paragraph (a)(2) of this section. (During oil operations personnel have access and carry hand-held cell phones for emergency communication.)

(ii) If there is ever just one employee on the premises while the facility is operating, the employee must have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, unless such a device is not required in paragraph (a)(2) of this section. (Each employee carries a hand-held cell phone.)

(5) ***Required Aisle Space***

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, unless aisle space is not needed for any of these purposes. (Nature Environmental & Marine Service maintains aisle space in the warehouse.)

(6) ***Arrangements with Local Authorities***

The owner or operator must attempt to make the following arrangements, as appropriate for the type of used oil handled at the facility and the potential need for the services of the organizations (We have LOI with Miller Environmental for spills)

(A) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of used oil handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. (Nature Environmental & Marine Service has contacted local authorities and presented a copy of the SPCC Plan which includes facility Map with the Plant Entrance clearly marked.)

(B) Where more than one police and fire department might respond to an emergency, agreements designating primary emergency authority to specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority. (See attached letters)

(C) Agreements with State Emergency Response Teams, emergency response contractors, and equipment suppliers. (Nature Environmental & Marine Service has agreements with Miller Environmental emergency response contractor and equipment supplier.)

(D) Arrangements to familiarize local hospitals with the properties of used oil handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. (Nature Environmental & Marine Service has notified hospital to identify the type of oil and type of possible injury from the oil.)

(ii) Where State or local authorities decline to enter such arrangements, the owner or operator must document the refusal in the operating record.

(b) ***Contingency Plan and Emergency Procedures***

Owners and operators of used oil processing and re-refining facilities must comply with the following requirements:

(1) ***Purpose and Implementation of Contingency Plan***

Each owner or operator must have a Contingency Plan for the facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water. (This Contingency Plan and the Site SPCC Plan incorporate the Site's Total Plan)

(ii) The provisions of the Contingency Plan must be carried out immediately whenever there is a fire, explosion, or release of used oil which could threaten human health or the environment.

(2) ***Content of Contingency Plan***

The Contingency Plan must describe the actions of facility personnel must take to comply with Paragraphs (b)(1) and (6) of this section in response to fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water at the facility. (See this General Facility Standards Plan and the SPCC Plan.)

(ii) If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with Part 112 of this chapter, or Part 1510 of Chapter V of this title, or some other emergency or Contingency Plan, the owner or operator need only amend that plan to incorporate used oil management provisions that are sufficient to comply with the requirements of this part. (The SPCC Plan has been amended to cover used oil and 40 CFR 479.52 Requirements.)

(iii) The Plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to Paragraph (a)(6) of this section. (See attached letters and the SPCC Plan)

(iv) The Plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (See Paragraph (b)(5) of this section), and this list must be kept up to date. Where more than one person is listed, one must be named as

primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. (See SPCC Plan)

(v) The Plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications, and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities. (See GFS and SPCC Plan)

(vi) The Plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This Contingency Plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of used oil or fires). (See SPCC Plan)

(3) ***Copies of Contingency Plan***

A copy of the Contingency Plan and all revisions to the Contingency Plan must be:

(i) Maintained at the facility: (A copy of the General Facility Standards plan and the SPCC Plan with contingency information is located in the operations supervisor office.)

(ii) Submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.
(A summary of the Contingency Plan, information has been submitted to local fire, police & hospital.)

(4) ***Amendment of Contingency Plan.*** The Contingency Plan must be reviewed, and immediately amended, if ***necessary***, whenever:

(i) Applicable regulations are revised.

(ii) The plan fails in an emergency; and

(iii) The facility changes- in its design, construction, operation, maintenance, or other circumstances- in a way that materially increases the potential for fires, explosions, or releases of used oil, or changes the response necessary in an emergency.

(iv) The list of emergency coordinators; **or**

(v) The list of emergency equipment changes.

(5) ***Emergency Coordinator***

At all times, there must be at least one employee either on the facility premises or on call (ie, available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This

emergency coordinator must be thoroughly familiar with all aspects of the facility's Contingency Plan, all operation and activities at the facility, the location and characteristic of used oil handled the location of all records within the facility, and facility layout. In addition, this person must have the authority to commit the resources needed to carry out the Contingency Plan. (The SPCC Plan identifies the emergency coordinator or on call EC, and this information is posted in the entrance to the site.)

Guidance: The emergency coordinator's responsibilities are more fully spelled out in Paragraph (b)(6) of this section. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of used oil handled by the facility, and type of complexity of the facility.

(6) ***Emergency Procedures***

(i) Whenever there is an imminent or actual emergency, the emergency coordinator (or the designee when the emergency coordinator is on call) must immediately:

(A) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(B) Notify appropriate State or local agencies with designated response roles if their help is needed.

(ii) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analyses.

(i) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

(iv) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

(A) If his assessment indicated that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; **and**

(B) The coordinator must immediately notify either the government official designated as the on-scene coordinator for the geographical area (in this applicable regional Contingency Plan

under Part 1510 of this title), or the National Response Center (using their 24-hour toll free number 800-424-8802).

The Report *must* include:

(1) Name and telephone number of reporter.

(2) Name and address of facility.

(3) Time and type of incident (e.g., release, fire).

(4) Name and quantity of material(s) involved, to the extent known.

(5) The extent of injuries, if any; and

(6) The possible hazards to human health, or the environment, outside the facility.

(v) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or hazardous waste at the facility. These measures must include where applicable, stopping processes and operation, collecting, and containing released used oil, and removing or isolating containers.

(vi) If the facility stops operation in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(vii) Immediately after an emergency, the emergency coordinator must provide for recycling, storing, or disposing of recovered used oil, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

(viii) The emergency coordinator must ensure that, in the affected areas(s) of the facility.

(A) No waste or used oil that may be incompatible with the released material is recycled, treated, stored, or disposed of until cleanup procedures are completed; and

(B) All emergency equipment listed in the Contingency Plan is cleaned and fit for its intended use before operations are resumed.

(C) The owner or operator (coordinator) must notify the Regional Administrator, and appropriate State and local authorities that the facility is in compliance with See Paragraphs (b)(6)(viii)(A) and (B) of this section before operations are resumed in the affected area(s) of the facility.

(ix) The owner or operator (coordinator) must note in the operating record the time, date and details of any incident that requires implementing the Contingency Plan. Within 15 days

after the incident, the coordinator must submit a written report on the incident to the Regional Administrator. The report must include:

(A) Name, address, and telephone number of the owner, operator, and coordinator.

(B) Name, address, and telephone number of the facility.

(C) Date, time, and type of incident (e.g., fire, explosion).

(D) Name and quantity of material(s) involved.

(E) The extent of injuries, if any.

(F) An assessment of actual or potential hazards to human health or the environment, where this is applicable.

(G) Estimated quantity and disposition of recovered material that resulted from the incident.

APPENDIX 6.
NATURE ENVIRONMENTAL OIL HANDLER ANALYSIS PLAN

"Oil Analysis Plan"

INSTRUCTIONS

I. MIXTURES OF USED OIL AND HAZADOUS WASTE

Used oil generators and handlers (transporter, transfer, and re-refining, processing, or off-specification oil burning facility) are responsible for ensuring that used oil is not intentionally mixed with a hazardous waste. If listed hazardous waste (F, K, P, or U waste) or characteristically hazardous waste does become mixed with used oil, the resulting mixture may have to be managed as hazardous waste. If the resulting mixture is not hazardous, it is managed as used oil.

- Mixtures of used oil and listed hazardous waste are managed as listed hazardous waste.
- Mixtures of used oil and ignitable-only characteristically hazardous waste are managed as used oil unless *the resulting mixture exhibits the characteristic of ignitability*. (Flash Point less than 140°F).
- Mixtures of used oil and characteristically hazardous waste are managed as used oil unless *the resulting mixture exhibits any hazardous characteristics*.
- Mixtures of used oil and non-regulated hazardous waste are managed as used oil.
- Mixtures of used oil and fuel products are managed as used oil.
- Mixtures of used oil with hazardous waste from a *Conditionally Exempt Small Quantities Generator (CESQG) or household* are managed as used oil.

Exemption: Used oil is exempt from hazardous waste regulations if the used oil:

- is destined to be recycled (re-refining, reclaiming, processing for reuse as lube oil, or burned for energy);
- is not rendered hazardous by mixing with characteristically hazardous waste; and
- is not mixed with a listed hazardous waste.

Used oil containing more than 1,000 ppm of total halogens is presumed hazardous unless the used oil generator or handler can demonstrate that the used oil was not mixed with listed hazardous waste.

Any mixing or blending of used oil with hazardous waste to bring down the level of a hazardous concentration is considered a hazardous waste treatment activity and may require a hazardous waste.

Mixtures of Used Oil with Halogens

A generator must evaluate used oil at the time it is generated. Each used oil handler – transporter, processor / refiner, marketer, and burner – must prove that used oil was not mixed with a listed waste; the proof can be made either by adequate documentation or by testing the used oil. This requirement does not apply to used oil generated by a household do-it-yourselfer or by a CESQG. It also does not apply to a collection center that only accepts household used oil.

The Rebuttable Presumption

Used oil containing more than 1,000 parts per million (ppm) of total halogens is presumed to be mixed with a halogenated listed hazardous waste. This presumption is known as the "rebuttable presumption". To rebut it, a used oil handler must prove that the used oil containing more than 1,000 ppm total halogens does not contain halogenated listed hazardous waste. This proof must be supported either by analytical data or by process knowledge. (The most common halogens are fluorine, chlorine, and bromine.)

Caution: Mixing or blending used oils or diluting such mixtures to bring the level of halogens down to less than 1,000 ppm is considered a processing activity and requires a hazardous waste treatment permit.

Process Knowledge Versus Analytical Data

There are two general approaches to proving that used oil destined for recycling is not mixed with hazardous waste: analytical testing (described in the subsection titled "Analytical Data") or documented process knowledge.

Documented Process Knowledge

The term **"process knowledge"** refers to a used oil handler's understanding of the operations and activities that created the used oil at the facility and possible contaminants in the used oil. The word **"documented"** refers to records of the used oil's origin, use, processes it has undergone, identification of possible contaminants, and other information on used oil activities. If enough documented process knowledge is available to show that mixing did not occur, than the used oil handler may eliminate the cost of analytical testing.

Analytical Data

The Environmental Protection Agency (EPA) recommended test methods for the rebuttable presumption are listed in Table 1. Methods listed in the table are used to determine total halogen content and specific halogens, to demonstrate that used oil has not been mixed with a listed hazardous waste. However, other EPA – approved text methods may be used to demonstrate the analytical results.

- ***Total halogen*** content can be determined by EPA methods (nonspecific determination) listed in Table 1. If the total halogen content is more than 1,000 ppm, then a more specific test method should be used to determine the level of individual halogenated compounds. The CLOR-D-TECT Test used by Inland follows SW-846 or SW-9077.

- ***Specific halogen*** content can be determined using one of the methods also listed in Table 1. For example, to determine halogen-containing volatile compounds in used oil, EPA Method 3585 is used for sample preparation, and Method 8260 or Method 8021 may be used for sample analysis. For analysis of halogenated pesticides, Method 8081A is recommended.

Exemptions

The following used oils are exempt from the rebuttable presumption. In other words, you do not have to prove that they have not been mixed with halogenated listed waste.

- Metal-working oils contaminated with chlorinated paraffins are not subject to the rebuttable presumption if the used oils are reclaimed through a tolling arrangement. A tolling arrangement is a contract between a processor / re-refiner and a generator stating that used oil reclaimed is to be returned to the generator. The generator uses the reclaimed oil as a lubricant, cutting oil, or coolant.

- If the used oil is not included in a metal-working tolling arrangement, the presumption may be rebutted if the generator can prove that the source of the total halogen content is chlorinated paraffins and the used oil was not mixed with a chlorinated hazardous waste.

- Used oil from a CESQG or household is not subject to the rebuttable presumption.

- Used oil contaminated with chlorofluorocarbons (CFC's) removed from refrigeration units is exempt from the rebuttable presumption when the CFC's are destined for

reclamation. However, CFC-contaminated used oils that have been mixed with used oil from sources other than refrigeration units are not exempt from the rebuttable presumption.

TABLE 1: ANALYTICAL METHODS FOR ORGANIC HALOGENS DETERMINATION (EPA SW-846 METHODS)

Determination	Sample Preparation Method	Sample analysis Method
Total Halogens	N / A	9075, 9076, 9077
Total Halogens	5050	9056, 9253
Individual Halogens	3585 (liquid organic matrix)	8260 or 8021
Halogenated Pesticides	3580	8081A

Source: **EPA Test Methods for Evaluating solid Waste, Physical Chemical Methods (SW-846), *Third Edition***

II. USED OIL FUEL SPECIFICATIONS

Used oil to be burned for energy recovery is divided into two classes: ***First* on-specification** used oil which contains not more than the allowable levels of contaminants shown in Table 2; and ***Second* off-specification** used oil which exceeds the allowable levels.

- **On-specification** used oil burned for energy recovery is not subject to the used oil management standards so long as (a) the used oil is not mixed with or contaminated by hazardous waste; and (b) it meets the marketer requirements in §40 CFR 279.72-73 (analysis, record retention, and EPA ID No.) and 279.74(b) (on-specification records / tracking).

- A used oil burner may mix **off-specification** used oil with virgin oil or with on – specification oil; but if the used oil is mixed to produce on-specification processor and possibly to the marketer requirements.

TABLE 2: SPECIFICATIONS FOR USED OIL BURNED FOR ENERGY RECOVERY

Constituent	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum
Flash Point	100°F maximum

Total Halogen Content for Used Oil as a Fuel

Used oil burned for energy recovery is subject to the used oil management standards. One requirement concerns total halogen content. If the total halogen content is 1,000 ppm or more, but less than 4,000 ppm, and the used oil handler con successfully prove the used oil was not mixed with listed halogenated hazardous waste (F, K, U, or P), the used oil can be burned as an on-specification fuel for energy recovery, provided all other requirements listed in Table 2 are met. Table 3 show how total halogen content affects burning used oil as a fuel.

TABLE 3: TOTAL HALOGEN CONTENT FOR USED OIL AS A FUEL

Total Halogens	Hazardous Waste Or Used Oil?	May be Burned in:
Less than 1,000 ppm	Used Oil	On-specification Unit[1]
From 1,000 to less than 4,000 ppm	Used Oil (if hazardous waste presumption successfully rebutted)	On-specification Unit[1]
More than 4,000 ppm	Used Oil (if hazardous waste presumption successfully rebutted)	Off-specification Unit or undergone further processing to be burned in an On-specification Unit

[1] ***If all other requirements shown in Table 2 have been met.***

Approved Test Methods for Used Oil Fuel Specifications

Table 4 includes some of the EPA-recommended SW-846 test methods to determine used oil specification levels. However, other EPA-approved test methods may be used to demonstrate the analytical results.

TABLE 4: SOME ANALYTICAL METHODS FOR USED OIL FUEL SPECIFICATIONS

DETERMINATION	METHODS	
	Sample Preparation	Sample Analysis
Multi-element analysis including arsenic, cadmium, chromium, and lead	3051	6010A, 6020
Arsenic	3051	7060A, 7061A, 7062
Cadmium	3051	7130, 7131A
Chromium	3051	7190, 7191
Lead	3051	7420, 7421

Source: **EPA Test Methods for Evaluating solid Waste, Physical / Chemical Methods (SW-846), *Third Edition***

III. USED OIL CONTAINING PCB's

PCB's (polychlorinated biphenyis) are man-made organic chemicals that range in consistency from heavy, oily liquids to waxy solids. They are used for their cooling properties because they only boil at high temperature and do not readily react with other chemicals.

Used oil containing PCB's can be burned for energy recovery, but only in combustion units that thermally degrade the PCB's; for example, rotary kilns, cement kilns, liquid injection incinerators, and high-temperature boilers.

The regulations you have to follow depend on the concentration of PCB's in the used oil.

From 2 ppm to Less than 50 ppm

Used oil that is to be burned for energy recovery is presumed to contain 2 ppm or more PCB's unless the person generating the used oil can document, by testing or process knowledge, that the oil contains no detectable PCB's.

Used oil containing between 2 ppm and less than 50 ppm of PCB's that is to be burned for energy recovery is subject to the following regulations:

- The used oil management standards; and
- §40 CFR 761.20(e) – Federal regulations implementing the Toxic Substances Control Act (TSCA); includes requirements on marketing, burning, testing, and record keeping.

Less than 2 ppm

Used oil that is to be burned for energy recovery and contains less than 2 ppm PCB's are not regulated under TSCA but are regulated under §40 CFR Part 279.

Used oil management standards – the Federal and State laws and regulations that apply to all used oil handlers.

- §40 CFR Part 279, Federal regulations on management of used oil.
- 30 TAC Chapter 324, State regulations on used oil recycling (adoption of §40 CFR Part 279).
- THSC Chapter 371, State law on collection, management, and recycling of used oil.

From 2 ppm to Less than 50 ppm

Under §40 CFR 761.20(e), used oil containing from 2 ppm to less than 50 ppm of PCB's being sent to energy recovery may be burned in qualified incinerators as defined in §40 CFR 279.61(a)(1) and 279.61(a)(2). This includes industrial furnaces and boilers identified in §40 CFR 260.10.

SAMPLE ID No.

_____

LAB RECORD FOR DOCUMENTATION THAT USED OIL IS NOT MIXED WITH A LISTED HAZARDOUS WASTE AND / OR USED OIL SPECIFICATION HAS BEEN MET

1. Source of sample/generator: Ocean going vessels / tankers, bulkers, container vessels.

Location of Sample: _Docks along the Texas Gulf

2. Date of Sample:

3. Sample Name / Generator ID: NA

4. Existing sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.

_The used oil that is collected is generated from the ship's engine room and machinery compartments that only use on spec lubricating oil for use of their machinery. _

5. If sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.

A. Describe sampling method used to obtain representative sample to be analyzed:
_we use a sludge judge to obtain a composite sample and use a Chlor D tect 1000 __

B. Describe the frequency of sampling to be performed:
__we sample 1 of 10 outbound loads_____

_____

C. Analysis will be performed on-site at _____NEMS Facility_____ (company) (Yes __), or off-site at _____ and at what frequency? _____1 of 10 outbound loads_____

D. The method used to analyze used oil for the parameter specified in Section 279.53 (***Rebuttable Presumption for Used Oil*** – Determine whether the total halogen content is above or below 1,000 ppm) (e.g., CLOR-D-TECT 1,000 chlorine halogen test kit conforms to EPA SW-846 Method 9077), and CLOR-D-TECT _x_; Other __; Specify: _____

E. The type of information that will be used to determine the halogen content of the used oil (Results of CLOR-D-TECT __; or other (e.g., applying knowledge of halogen content of the used oil in light of the materials or processed used):

NOTE: If greater than 1,000 ppm total halogens, it is presumed to be a hazardous waste because it was mixed with halogenated hazardous waste listed in Subpart D of 261 unless analytical methods from SW-846 shows oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of 261.

6. If the used oil is on-specification used oil (fuel), then

A. Specify if:

(a) sample analysis, or
(b) other information was used to make this determination:

B. If sample analysis was used to make this determination, then

(a) the sampling method must be either Appendix I, Part 261, Method or

(b) equivalent under Section 260.20 or 260.21, and
(c) the oil must be sampled and analyzed prior to any processing / re-refining.

C. State the frequency of sampling: _____

D. Location of analysis:

On-Site: _____
(company name)

Of-Site: _____
(company name)

E. Define the method used to analyze used oil for the parameters in Section 279.72 (Refers to 279.11 Used Oil Specifications (Metals and Flash)):

_____
_____, and

the type of information that will be used to make the on-specification used oil fuel determination:

_____

_____

7. Describe the procedures to assure listed hazardous wastes are not mixed with the used oil received:

_____
_____

8. Procedures for handling a shipment of contaminated used oil:

_____
_____

Oil Sample Data Based on Process Knowledge and Data from NEMS and Oil Source

Nature Environmental & Marine Services, LLC
Houston Facility
18511Beaumont Highway
Houston, Texas 77049

SAMPLE ID No.

_____

Lab Record for Documentation that Used Oils is Not Hazardous Based on Hazardous Characteristic

1. Source of Sample / Generator: _____

   Generator Address_____

   _____

   Location of Sample: _____

2. Date of Sample: _____

3. Sample Name (Generator ID): _____

4. Does oil mixture exhibit the characteristic of ignitability?

   YES _____ (Flash Point less than 140°F) _____

   NO _____; _____

   Note: Mixtures of used oil and fuel products are managed as used oil. If the characteristic of ignitability of the oil is by its own nature and the material is to be recycled, the material is under 40 CFR 279 and is to be managed as used oil.

   If *"NO"*, state source of information: _____

   Testing: _____

   Process Knowledge: _____

5. Does oil mixture exhibit a pH value?

   YES _____: Value: _____

   NO _____: _____

6. Does oil mixture exhibit a characteristic of reactivity?

   YES _____: Describe: _____

   NO _____: Source (Testing ____; Process Knowledge _____)

7. Does oil mixture exhibit a toxicity characteristic?

YES _____ : Describe: _____

NO _____: Source (Testing ____; Process Knowledge _____)

Additional Data from Source of Oil or Lab Testing by NE or Others

1. Percent Oil in Sample _____
2. Percent Water in Sample _____
3. Total Petroleum hydrocarbon Value of Sample _____ mg/L
4. Total Halogen Content (Chlorine)_____ppm
5. Metals: Arsenic _____ ppm
   Cadmium _____ppm
   Chromium _____ppm
   Lead _____ppm

Other comments _____

Used oil to be Burned for Energy Recovery

1. Does the used oil contain "No" detectable PCB's?

YES _____: Type of Test: _____

or

Process Knowledge: _____

2. Does used oil contain less than 2 ppm PCB's?

YES _____: Type of Test: _____

or

Process Knowledge: _____

_____

3. Does used oil contain from 2ppm to less than 50 ppm PCB's?

YES _____: Type of Test: _____

or

Process Knowledge: _____

APPENDIX 7.
NATURE ENVIRONMENTAL OIL TESTING FROM APRIL 2024

Nature Environmental & Marine Services, LLC
Houston Facility
18511Beaumont Highway
Houston, Texas 77049

SAMPLE ID No.

_____

LAB RECORD FOR DOCUMENTATION THAT USED OIL IS NOT MIXED WITH A LISTED HAZARDOUS WASTE AND / OR USED OIL SPECIFICATION HAS BEEN MET

1. Source of sample/generator: Ocean going vessels / tankers, bulkers, container vessels.

   Location of Sample: _Docks along the Texas Gulf

2. Date of Sample: 4-13-24

3. Sample Name / Generator ID: NA

4. Existing sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.
   _The used oil that is collected is generated from the ship's engine room and machinery compartments that only use on spec lubricating oil for use of their machinery. _

5. If sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.

   A. Describe sampling method used to obtain representative sample to be analyzed:
   _we use a sludge judge to obtain a composite sample and use a Chlor D tect 1000 __

   B. Describe the frequency of sampling to be performed:
   __we sample 1 of 10 outbound loads_____

   C. Analysis will be performed on-site at _____NEMS Facility_____ (company) (Yes __), or off-site at _____ and at what frequency? _____1 of 10 outbound loads_____

   D. The method used to analyze used oil for the parameter specified in Section 279.53 (***Rebuttable Presumption for Used Oil*** – Determine whether the total halogen content is above or below 1,000 ppm) (e.g., CLOR-D-TECT 1,000 chlorine halogen test kit conforms to EPA SW-846 Method 9077), and CLOR-D-TECT _x_; Other __; Specify: _____ 1000ppm _____

E. The type of information that will be used to determine the halogen content of the used oil (Results of CLOR-D-TECT __; or other (e.g., applying knowledge of halogen content of the used oil in light of the materials or processed used):

NOTE: If greater than 1,000 ppm total halogens, it is presumed to be a hazardous waste because it was mixed with halogenated hazardous waste listed in Subpart D of 261 unless analytical methods from SW-846 shows oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of 261.

6. If the used oil is on-specification used oil (fuel), then

A. Specify if:

(a) sample analysis, or
(b) other information was used to make this determination:

B. If sample analysis was used to make this determination, then

(a) the sampling method must be either Appendix I, Part 261, Method or Clor-D-Tect

(b) equivalent under Section 260.20 or 260.21, and
(c) the oil must be sampled and analyzed prior to any processing / re-refining.

C. State the frequency of sampling: every 10 loads

D. Location of analysis:

On-Site: NEMS (company name) T7 trailer

Of-Site: _____
(company name)

E. Define the method used to analyze used oil for the parameters in Section 279.72 (Refers to 279.11 Used Oil Specifications (Metals and Flash)):

_____

_____, and

the type of information that will be used to make the on-specification used oil fuel determination:

_____

_____

7. Describe the procedures to assure listed hazardous wastes are not mixed with the used oil received:

_____

_____

8. Procedures for handling a shipment of contaminated used oil:

_____

_____

X SG. - 4-13-21

Oil Sample Data Based on Process Knowledge and Data from NEMS and Oil Source

Nature Environmental & Marine Services, LLC
Houston Facility
18511Beaumont Highway
Houston, Texas 77049

SAMPLE ID No.

_____

LAB RECORD FOR DOCUMENTATION THAT USED OIL IS NOT MIXED WITH A LISTED HAZARDOUS WASTE AND / OR USED OIL SPECIFICATION HAS BEEN MET

1. Source of sample/generator: Ocean going vessels / tankers, bulkers, container vessels.

   Location of Sample: _Docks along the Texas Gulf

2. Date of Sample: 4-22-24

3. Sample Name / Generator ID: NA

4. Existing sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.
   _The used oil that is collected is generated from the ship's engine room and machinery compartments that only use on spec lubricating oil for use of their machinery. _

5. If sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.

   A. Describe sampling method used to obtain representative sample to be analyzed:
   _we use a sludge judge to obtain a composite sample and use a Chlor D tect 1000 __

   B. Describe the frequency of sampling to be performed:
   __we sample 1 of 10 outbound loads_____

   C. Analysis will be performed on-site at _____NEMS Facility_____
   (company) (Yes __), or off-site at _____
   and at what frequency? _____1 of 10 outbound loads_____

   D. The method used to analyze used oil for the parameter specified in Section 279.53 (***Rebuttable Presumption for Used Oil*** – Determine whether the total halogen content is above or below 1,000 ppm) (e.g., CLOR-D-TECT 1,000 chlorine halogen test kit conforms to EPA SW-846 Method 9077), and CLOR-D-TECT _x_; Other __;
   Specify: _____ 800 ppm

E. The type of information that will be used to determine the halogen content of the used oil (Results of CLOR-D-TECT __; or other (e.g., applying knowledge of halogen content of the used oil in light of the materials or processed used):

NOTE: If greater than 1,000 ppm total halogens, it is presumed to be a hazardous waste because it was mixed with halogenated hazardous waste listed in Subpart D of 261 unless analytical methods from SW-846 shows oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of 261.

6. If the used oil is on-specification used oil (fuel), then

A. Specify if:

(a) sample analysis, or
(b) other information was used to make this determination:

B. If sample analysis was used to make this determination, then

(a) the sampling method must be either Appendix I, Part 261, Method or Clor-D-tect

(b) equivalent under Section 260.20 or 260.21, and
(c) the oil must be sampled and analyzed prior to any processing / re-refining.

C. State the frequency of sampling: every 10 loads

D. Location of analysis:

On-Site: NEMS TTS-trailer
(company name)

Of-Site: _____
(company name)

E. Define the method used to analyze used oil for the parameters in Section 279.72 (Refers to 279.11 Used Oil Specifications (Metals and Flash)):

_____
_____, and

the type of information that will be used to make the on-specification used oil fuel determination:

_____

_____

7. Describe the procedures to assure listed hazardous wastes are not mixed with the used oil received:

_____
_____

8. Procedures for handling a shipment of contaminated used oil:

_____
_____

X SG 4-22-24

Oil Sample Data Based on Process Knowledge and Data from NEMS and Oil Source

Nature Environmental & Marine Services, LLC
Houston Facility
18511Beaumont Highway
Houston, Texas 77049

SAMPLE ID No.

_____

LAB RECORD FOR DOCUMENTATION THAT USED OIL IS NOT MIXED WITH A LISTED HAZARDOUS WASTE AND / OR USED OIL SPECIFICATION HAS BEEN MET

1. Source of sample/generator: Ocean going vessels / tankers, bulkers, container vessels.

   Location of Sample: _Docks along the Texas Gulf

2. Date of Sample: 4-30-24

3. Sample Name / Generator ID: NA

4. Existing sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.
   _The used oil that is collected is generated from the ship's engine room and machinery compartments that only use on spec lubricating oil for use of their machinery. _

5. If sample analysis or process knowledge that states or lists halogen content and that the used oil is not mixed with a listed hazardous waste.

   A. Describe sampling method used to obtain representative sample to be analyzed:
   _we use a sludge judge to obtain a composite sample and use a Chlor D tect 1000 __

   B. Describe the frequency of sampling to be performed:
   __we sample 1 of 10 outbound loads_____

   C. Analysis will be performed on-site at _____NEMS Facility_____ (company) (Yes __), or off-site at _____ and at what frequency? _____1 of 10 outbound loads_____

   D. The method used to analyze used oil for the parameter specified in Section 279.53 (***Rebuttable Presumption for Used Oil*** – Determine whether the total halogen content is above or below 1,000 ppm) (e.g., CLOR-D-TECT 1,000 chlorine halogen test kit conforms to EPA SW-846 Method 9077), and CLOR-D-TECT _x_; Other __; Specify: _____ 650 ppm

E. The type of information that will be used to determine the halogen content of the used oil (Results of CLOR-D-TECT __; or other (e.g., applying knowledge of halogen content of the used oil in light of the materials or processed used):

NOTE: If greater than 1,000 ppm total halogens, it is presumed to be a hazardous waste because it was mixed with halogenated hazardous waste listed in Subpart D of 261 unless analytical methods from SW-846 shows oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of 261.

6. If the used oil is on-specification used oil (fuel), then

A. Specify if:

(a) sample analysis, or
(b) other information was used to make this determination:

B. If sample analysis was used to make this determination, then

(a) the sampling method must be either Appendix I, Part 261, Method or Cl Or-D-Tect

(b) equivalent under Section 260.20 or 260.21, and
(c) the oil must be sampled and analyzed prior to any processing / re-refining.

C. State the frequency of sampling: every 10 loads

D. Location of analysis:

On-Site: NEMS TT Trailer
(company name)

Of-Site: _____
(company name)

E. Define the method used to analyze used oil for the parameters in Section 279.72 (Refers to 279.11 Used Oil Specifications (Metals and Flash)):

_____
_____, and

the type of information that will be used to make the on-specification used oil fuel determination:

_____

_____

7. Describe the procedures to assure listed hazardous wastes are not mixed with the used oil received:

_____
_____

8. Procedures for handling a shipment of contaminated used oil:

_____
_____

X SG 4-30-24

Oil Sample Data Based on Process Knowledge and Data from NEMS and Oil Source