

ANCO Environmental Services, Inc.
40 Russo Place
Berkeley Heights, New Jersey 07922

ANCO Environmental Services, Inc.

Spill Prevention, Control and Countermeasure (SPCC) and
Facility Response Plan (FRP)

Date: July 2011

Prepared by: ANCO Environmental Services, Inc. (ANCO)

Table of Contents

1.0 SCOPE	1
2.0 PURPOSE	2
3.0 LEGAL AUTHORITY	2
4.0 ENVIRONMENTAL SETTING	3
Figure 1 -- Site Location Map	4
Figure 2 -- Site Plan	5
5.0 HISTORY OF PREVIOUS SPILLS	6
6.0 POTENTIAL DISCHARGES FROM FACILITY	7
7.0 STORAGE AREAS	8
Table 1	8
List of Above Ground Storage Tanks	8
8.0 CONTAINMENT PROVISIONS	9
8.1 Storage Tanks	9
8.2 Transfer Area	9
8.2.1 Clean-up arrangements	9
8.2.2 Sorbent materials	9
8.2.3. Drip Pans	9
Figure 3 -- Storage Tank details	10
9.0 PREVENTION AND CONTAINMENT PROCEDURES	12
9.1 Facility drainage	12
9.2 Inspections and testing	12
9.3 Facility transfer operations	13
9.3.1 Regular examinations	13
9.3.2 Vehicular traffic	13
9.4 Tank truck unloading rack	14
9.4.1 Containment system	14
9.4.2 Unloading procedures	14
10.0 INSPECTIONS AND RECORDS	1

11.0 SECURITY	3
11.1 Access control	3
11.2 Valves and Equipment	3

12.0 PERSONNEL TRAINING & SPILL PREVENTION PROCEDURES

12.1 Personnel training	4
12.2 Emergency coordinator	4
12.3 Spill prevention briefings	4

13.0 FACILITY RESPONSE PLAN (FRP)

13.1 Purpose	6
13.2 Responsibilities	6
13.3 Chain of Command	6
13.4 Discharge actions	7
13.4.1 Immediate actions	7
13.4.2 Action to be taken within 15 minutes	7
13.4.3 Notification within 30 days	7

14.0 CERTIFICATIONS

14.1 Corporate Management	9
14.2 Professional Engineer	9
14.3 Environmental Professional	9

1.0 Scope

This combined Spill Prevention, Control and Countermeasures (SPCC) and Facility Response Plan (FRP) has been developed to provide the ANCO Environmental Services, Inc. with a plan to prevent the occurrence of a discharge of petroleum products into the navigable waters of the United States by controlling the storage and transfer of petroleum products. The plan also provides for the prompt containment of any and all leaked hazardous substances.

This SPCC/FRP plan is prepared in accordance with both the federal requirements of 40 CFR 112 and state requirements of N.J.A.C. 7:1E.

Additionally, ANCO Environmental Services, Inc. (ANCO) has also developed an Emergency Response Reference Guide for this facility. This SPCC/FRP should be used in conjunction with and as a complement to the facility's Emergency Response Reference Guide.

2.0 Purpose

The US Environmental Protection Agency (USEPA) regulations (40 CFR 112.3) require the owners or operators of onshore and offshore facilities that due to their locations, and could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines, shall prepare a Spill Prevention, Control and Countermeasure Plan and Facility Response Plan (SPCC/FRP). The ANCO Environmental Services, Inc. maintains five (5) Above Ground Storage Tanks (ASTs) on site that could be expected in the event of an accident, to discharge heating oil, oily water or diesel fuel into waters regulated by the USEPA. Accordingly, this plan has been developed following the guidelines and sequence for the preparation and implementation of a Spill Prevention Control and Countermeasure Plan as found in 40 CFR 112.7.

3.0 Legal Authority

This plan has been developed so that it complies with the Federal Oil Pollution Prevention standards as stipulated in 40 CFR 112.3 that states in part "Owners or operators of onshore and offshore facilities that due to location, could reasonably be expected to discharge oil in harmful quantities, into or upon the navigable waters of the United States or adjoining shorelines, shall prepare a Spill Prevention, Control and Countermeasure and Discharge, and a Facility Response Plan (SPCC/FRP) in writing."

4.0 Environmental Setting

The ANCO Environmental Services, Inc. site is located in the primarily residential area of the Township of Berkeley Heights, with a population of approximately 13,000 people. A site location map is presented as Figure 1. A site plan is presented as Figure 2. The facility is entirely bordered by commercial and industrial properties; the nearest residential site is approximately ½ mile east of the site. A nearby Robins Avenue Tributary flows through the property and is part of the Upper Passaic River.

The community is generally sewerred. Berkeley Heights has a public water supply. ANCO Environmental Services, Inc. receives its potable water from the public supply.

Figure 1 – Site Location Map

5.0 History of Previous Spills

The ANCO Environmental Services, Inc. facility has not experienced any spill events since occupying the site in 2004. Before ANCO the site was occupied by Barker Bus Co. who removed two regulated UST's in 1998. One of these tanks found to have leaked a small quantity of petroleum. The clean up of the discharge was physically completed in 2000, and is currently in RAO review under the LSRP program for dismissal due to de minimus impact.

6.0 Potential Discharges from Facility

A spill or leak that was not contained would flow generally southeasterly to areas of the adjacent properties. This lot is drained to the city stormwater system with eventual discharge into storm drains along Russo Place. The storm drains reportedly discharge down-gradient from the site. A drainage easement runs along the northern property boundary. A 48" diameter pipe carries storm water from Robbins Ave, across the NJ transit rail line thru to the Passaic River.

7.0 Storage Areas

The ANCO Environmental Services, Inc. maintains five – (5) above ground storage tanks (ASTs) and (1) underground storage tank at the facility. Tanks 1 & 2 store diesel fuel for construction equipment and dump trucks, tanks 3 & 4 are used for storage oily water that has been accumulated during UST removals, tanks 5 & 6 are used to store # 2 heating oil for distribution. A complete list of these tanks with corresponding storage capacities and contents is shown in Table 1 below.

The facility also stores various lubricating oils, waste oil and assorted petroleum products at its vehicle maintenance garage building. Container sizes range from 1 quart to 275 gallons. The total maximum storage quantity for the vehicle maintenance garage building is approximately 650 gallons.

Table 1

LIST OF ABOVE GROUND STORAGE TANKS

TANK NO.	CAPACITY	CONTENTS	TYPE
Tank #1	1,400 -- gallons	Diesel Fuel	DW Above ground steel
Tank #2	3,000 -- gallons	Diesel Fuel	DW Above ground steel
Tank #3	6,000 -- gallons	Heating Oil	DW Above ground steel
Tank #4	4,000 -- gallons	Oily Water	SW Above ground steel
Tank #5	5,000 -- gallons	#2 Heating Oil	SW Above ground steel
Tank #6	10,000 -- gallons	#2 Heating Oil	DW Underground steel
Tank #7	4,000 -- gallons	#2 Heating Oil	DW Above ground steel

8.0 Containment Provisions

8.1 Storage Tanks

All above ground and underground storage tanks at the ANCO Environmental Services, Inc. facility are constructed of steel. Details of the tanks are shown in Table 1. The largest single tank on site is 10,000 gallon double walled underground storage tank

8.2 Transfer Area

8.2.1 Clean up arrangements

It has been determined that installation of structures and equipment for containment of the tank truck loading/unloading area is impractical. Therefore, ANCO maintains all the necessary equipment and materials to contain any on site release. ANCO is in the business of decontaminating sites impacted by petroleum and owns dozens of specialized vehicles and pieces of remediation equipment and employs 34 operators, environmental technicians and environmental Scientists. Additionally, ANCO has networking relationships with other nearby remediation firms who will respond and assist until ANCO staff.

8.2.2 Sorbent materials

The ANCO Environmental Services, Inc. maintains sufficient sorbent materials at the site to absorb small spills, leaks and drips. Additionally, free product extraction equipment is on site to contain a moderate spills and vacuum any leaking tank.

8.2.3 Drip pans

Drip pans are used in operations that typically could result in small spills or drips such as making/breaking hose connections.

8.2.4 Vacuum Trucks

ANCO owns 3 Vacuum trucks and 2 tanks wagons for transport and temporary storage of petroleum products.

Figure 3 - Storage tank details

8.3 Drum Storage Areas

8.3.1 Vehicle Maintenance Garage Building

The maximum predicted discharge from within the garage is 200 gallons if a 275 tank, truck saddle tank or 55 gallon drum were to leak. It has been determined that due to the small quantity present in a single container and, the configuration of the storage area, it is unlikely that a leak or spill from this area would reach the property line/or be discharged into the navigable waters. However, ANCO Environmental Services, Inc. maintains sufficient sorbent materials and pump equipment in the location to absorb and/or contain a spill if it should occur.

8.3.2 Store Room Building

The maximum predicted discharge from this area is 55 gallons. It has been determined that due to the small quantity present in a single container and the configuration of the storage area, it is unlikely that a leak or spill from this area would reach the property line and/or be discharged into the navigable waters. However, the ANCO Environmental Services, Inc. maintains sufficient sorbent materials in the location to absorb and/or contain a spill if it should occur.

9.0 Prevention and Containment Procedures

9.1 Facility Drainage

Storm water that accumulates at the facility is collected from building roof drains and drains on to the ground surface, then eventually flows to storm sewers located along Russo Place.

Storm water runoff from the truck unloading area is also to the ground surface at the facility. This pitches to the southeast down the driveway onto Russo Place.

9.2 Inspections and testing

9.2.1 Inspections and testing

Daily inspections

Daily inspections of the storage areas and the outsides of the tanks are conducted by the facility emergency coordinator, alternate or a designee. Inspections include observing for accumulation of fuel on the surfaces, and looking for signs of deterioration or leaks which might cause a spill. Visible fuel leaks which result in a loss of fuel from tank seams, gaskets, rivets and bolts sufficiently large to cause an accumulation of fuel on concrete pad areas are to be promptly corrected. Inspections of trade fuel truck is also made on a daily bases by drivers, and noted in their pre trip vehicle inspection report.

Quarterly inspections

The ANCO Environmental Services, Inc. emergency coordinator conducts quarterly inspections that include the following:

- All pumps, flanges, visible connections and valves are inspected for evidence of leakage, corrosion, damage and other signs of existing or potential malfunctioning.
- Vents are inspected for evidence of obstruction.
- The accuracy and proper functioning of all gauges are verified.
- All discharge control equipment, discharge control supplies and emergency response equipment is inspected and replaced as needed.
- Adequate inventory of absorbent material is verified.

Yearly inspections

- A complete inspection of all tanks, piping, pumps, containment structures, transfer equipment and ancillary equipment is performed yearly. Maintenance is performed as necessary to maintain the integrity of all equipment.

Five year inspections

- In addition to the yearly inspections described above, internal inspection of all storage tanks and associated equipment will be conducted by performing a visual inspection to all connections, flanges, valves and seals. Furthermore, tanks will be repainted on a 5 year schedule, as needed.

9.3 Facility transfer operations

9.3.1 Regular examinations

ANCO Environmental Services, Inc.

All vehicle valves, hoses aboveground valves and pipelines are examined regularly by facility personnel at which time the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are assessed. Drivers and operators are instructed to report any drips or product seepage to management

9.3.2 Vehicular traffic

Vehicular traffic into the facility shall be controlled and warned with permanently posted signs to be sure that the vehicles will not endanger any above ground piping and associated dispensers.

9.4 Tank truck transfer

ANCO Environmental Services, Inc. has sufficient sorbent materials to contain small spills, and vacuum trucks to cleanup any large discharges, with standby vacuum truck capacity exceeding the capacity of even the largest tank.

Unloading procedures and training

The ANCO Environmental Services, Inc. shall develop site specific unloading procedures for the subject facility that meets the minimum requirements and regulations established by the Department of Transportation. Standard operating procedures shall be developed and posted at the truck unloading area. Warning signs shall be posted in the unloading area to prevent vehicular departure before complete disconnect of transfer lines. Personnel performing transfers must be trained and have demonstrated ability and knowledge in the operation of the equipment. Transfer operators must have at least 6 months supervised experience before attempting transfers on his own.

Prior to departure of any tank truck, the lower-most drain and all outlets of such vehicles are closely examined for leakage, and if necessary, tightened, adjusted or replaced to prevent any liquid leakage while in transit.

Pre-Transfer – Off-loading

Transport drivers and operating personnel must confirm the receiving capacity of the above ground tanks prior to placing valves in the receiving mode.

On-site personnel confirm the receiving capacity of selected above ground tanks and confirm that the setting of the input assembly is in the proper mode before directing the transporter to proceed with unloading.

Transfer – Off loading

The transport driver or designated facility personnel, observes the transport system for leakage during off-loading and, if detected, terminates operation until the leakage has been remediated.

The transport vehicle driver must remain in visual contact and maintain control of the operation and gauges at all times throughout the transfer operation.

After off-loading is completed, catch buckets are emptied and dry-stored along with chock blocks.

10.0 Inspections and Records

ANCO Environmental Services, Inc. shall develop written procedures for all inspections required by this plan. The written procedures, records of inspections and this plan shall be readily accessible to all office personnel to ensure availability on demand by any authorized regulatory agency personnel. Other records that are maintained include the following:

- Facility environmental permits and identification numbers.
- Correspondence and directives from the EPA, NJDEP and other governing agencies.
- Copies of personnel training records.
- Copies of standard operating procedures.
- Certification of tank, pipe and hose inspections.
- Records of discharge events and accompanying reports to agencies.
- Manufacturer's data on sorbent materials and technology used for spill and discharge prevention and recovery.
- Emergency response contact and procedures.
- Inventory reconciliation reports.

Records of scheduled and un-scheduled maintenance and facility modifications.
Records of personnel training, drills, and discharge events will be retained for 5 years.

Records of integrity tests, inspections and major maintenance of all structures, equipment and related discharge prevention equipment shall be maintained for the lifetime of the structure, equipment or device.

ANCO Environmental Services, Inc.

11.0 Security

11.1 Access control

The ANCO Environmental Services, Inc. facility is situated on an open gravel lot with one entry point and one exit point. Access to the facility is generally restricted to employees and visitors.

11.2 Pumps, Valves and Equipment

All transfer operations are conducted using truck mounted delivery and vacuum pumps integrated to the truck body. Storage tanks in the yard have no transfer pumps. ANCO operates two dispensers for diesel fuel and off road diesel motor fuel. Power to all pumps is disabled after hours.

The master flow and drain valves and any other valves that will permit direct outward flow of the tank's content to the surface are securely locked in the closed position when in the non-operating or non-standby status. Power to the dispensers is disabled at the end of each day.

The starter control on all pumps are locked in the "off" position when the pumps are in a non-operation or standby status.

The unloading connections of pipelines are securely capped or blank-flanged when not in service or standby service for an extended time. This security practice applies to pipelines that are emptied of liquid content by draining or other means.

The facility provides adequate lighting for the location of the facility. Consideration has been given to discovery of spills occurring during hours of darkness, both by operating personnel and by non-operating personnel and prevention of spills occurring through acts of vandalism.

12.0 Personnel, Training & Spill Prevention Procedures

12.1 Personnel training

ANCO Environmental Services, Inc. has developed a training program for all personnel in the operation and maintenance of equipment to prevent the discharges of oil and to have knowledge of applicable pollution control laws, rules and regulations. This training includes, but is not limited to the following:

- Familiarization with equipment, processes, hazardous substances and their individual response to a discharge.
- A review of the standard operating procedures for the equipment the employee uses and the tanks the employee is assigned to perform.
- Information on the hazardous substances the employee will be in contact with.
- A review of the emergency response procedures outlined in this SPCC/FRP and the facility's comprehensive emergency management plan.
- ANCO Environmental Services, Inc. will conduct training, drills and make available training and reference materials for each employee designed to familiarize them with equipment, processes, hazardous substances and emergency response procedures in accordance with the facility's training schedule.

12.2 Emergency coordinator

ANCO Environmental Services, Inc. has designated Mr. Joseph Parisi as the primary emergency coordinator for the facility. He is accountable for oil spill prevention and emergency response operations at the facility.

12.3 Spill prevention briefings

ANCO Environmental Services, Inc. will schedule and conduct spill prevention briefings for their operating personnel at intervals frequent enough to assure adequate understanding of the SPCC/FRP. The briefings highlight and describe known spill events or failure, malfunctioning components and recently developed precautionary

measures. These briefings are conducted in conjunction with and in accordance with the schedule outlined in the facility's training schedule.

13.0 Facility Response Plan (FRP)

13.1 Spill prevention briefings

This section has been developed to provide all employees engaged in the operations of this facility with a Facility Response Plan (FRP). This plan should be used in addition to and in conjunction with the facility's Emergency Response Reference Guide.

13.2 Responsibilities

Any persons identifying a discharge is responsible for immediately initiating all necessary action and measure for containment, recovery and cleanup and notifying the appropriate persons, agencies and organizations in accordance with the facility's Emergency Response Reference Guide and the notification procedures in this plan. Both plans identify the qualified individuals having full authority to implement any needed removal action, identifies contractual arrangements for the containment and cleanup of large leaks or spills, and describes the training needed and response actions to be carried out by designated personnel.

13.3 Chain of Command

Mr. Joseph Parisi, is the facility's primary emergency coordinator.

Mr. Jim Froelich, is the facility's first alternate emergency coordinator.

Mr. Joe Parisi is responsible for the management of the SPCC/FRP in its entirety. Both Mr. Froelich and Mr. Parisi, in their capacity with the facility, possess the authority and background to make capital expenditures for basic compliance and emergency response. Both gentlemen have been authorized to release funds for discharge response, containment, cleanup and removal.

13.4 Discharge Response Procedures

13.4.1 Immediate Actions

Any person responsible for a discharge or any personnel aware of a discharge must initiate immediate action to stop the discharge and take all of the necessary and appropriate measures to contain, cleanup and remove the discharge, in accordance with the facility's emergency management plan.

13.4.2 Action to be taken within 15 minutes

Within 15 minutes of detecting a discharge, the NJDEP HOTLINE must be notified at (609) 292-7172.

The individual discovering the discharge or person aware of a discharge should immediately notify the emergency coordinator or alternate, who will then notify the NJDEP within 15 minutes of the discovery of the discharge, and in addition notify ANCO and the Berkeley Heights Fire Department must be called immediately, (Fire Department as well as the Fire official). A notification list with phone numbers is included as Exhibit B to this plan. If an emergency coordinator is not immediately available, the person detecting or observing the discharge must notify the NJDEP Hotline by calling 1-877-WARNDEP within fifteen minutes of the discovery or beginning of the discharge. The NJDEP will require specific information at the time of the call.

13.4.3 Notifications within 30 days

Within 30 days after a discharge incident, two written confirmation reports must be generated. These reports must be mailed to the NJDEP Bureau of Discharge Prevention and the EPA Regional Administrator. These reports must include:

- The name, address and telephone number of the individual filing the report and, if different, the individual making the report.
- The name, address and telephone number of each owner & operator of the company.
- The source and description of the discharge.
- The names of and estimated quantities of substances discharged.
- The date(s) of the discharge and discharge start and stop times.
- A detailed description of the response actions taken.

- A summary of the costs associated with the discharge.
- Copies of disposal records.
- A description of measures taken to prevent recurrence of the discharge.
- All persons involved in the cleanup and/or containment.
- Any sampling data.
- A complete copy of this SPCC/FRP.
- The maximum storage capacity and normal daily throughput of the facility.
- The date of initial startup of the facility operation.
- The names and addresses of any registered agents.

14.0 Certifications

14.1 Corporate Management

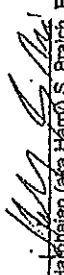
I have reviewed the provisions of the SPCC/FRP, determined the information to be accurate and have committed the resources necessary for its full implementation.


 Mark Andis, ANCO Environmental Services, Inc.

9/27/11
 Date

14.2 Professional Engineer

I hereby certify that I have examined the facility and being familiar with the provisions of 40 CFR 112 attest that his spill plan has been prepared in accordance with good engineering practices.


Hachrihan (aka Harry) S. Braitch, P.E.
President: Apex Group, Inc.
NJ P.E. License Number G22201
Certification of Authority: 24GA27815300

September 29, 2011
Date

14.3 Environmental Professional

I hereby certify that I have examined the facility and being familiar with the provision of 40 CFR 112 attest that this plan has been prepared in accordance with 40 CFR 112.7, Guidelines for the preparation and implementation of a Spill prevention Control and Countermeasure Plan.


John Weitz (ANCO) CHM/MLSPR

10/3/2011
Date

DELORME



Topo USA 6.0



Data use subject to license.
© 2000 Delorme, Topo USA® S.A.
www.delorme.com

