



July 3, 2019

CERTIFIED MAIL NO. 7003 1680 0000 9510 1920

Mr. Kevin Nero
Facility Manager
Coastal Chemical Co. LLC
P.O. Box 820
Abbeville, LA 70510

Re: Storage Tanks
Spill Prevention Response Plan Review
Coastal Chemical Co., LLC Facility
107 Miller Avenue
Montgomery, PA 17752
Montgomery Borough, Lycoming County

Dear Mr. Nero:

On April 5, 2019, The Department of Environmental Protection (DEP) received a Site-Specific Installation Permit (SSIP) for the installation of aboveground storage tanks (ASTs) at a Coastal Chemical Co., LLC facility in Montgomery Borough, Lycoming County, PA. The SSIP application was deemed to be complete on April 26, 2019, and technical review commenced at that time. Within the SSIP application package was a Spill Prevention Response Plan (SPRP), which is intended to include information to prevent releases at AST facilities and to provide crucial information in case of a release, including reporting requirements.

DEP staff have reviewed your SPRP and identified a number of deficiencies. These deficiencies are divided into two sections below. The first section lists deficiencies that should be corrected in order for DEP to finish the technical review of the SSIP application package. Deficiencies in the second section should be corrected prior to submitting a Storage Tanks Registration/Permitting Application Form to DEP. Failure to correct these issues may jeopardize your ability to construct and operate the ASTs. The DEP publication "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" is available on our website for your reference.

1. The following deficiencies need to be corrected prior to the completion of technical review of the SSIP application:

Emergency Spill Control Network

This section of the SPRP should include a listing and corresponding phone numbers for all emergency response agencies. This section should include a listing and corresponding phone numbers of all downstream water companies, municipalities, and industrial users

20 miles downstream from the facility. A downstream notification list was provided within your submitted SPRP, but should be expanded to include all downstream municipalities and water users.

Release Reporting

Please note, DEP recently revised 25 Pa. Code Chapter 245, the Administration of the Storage Tank and Spill Prevention Program. The terminology “reportable release” has been removed from Section 245.305 (Reporting Releases). Section 245.305(g) states “Upon the occurrence of a release at the aboveground storage tank...”. It no longer states, “Upon the occurrence of a reportable release at the aboveground storage tank...”. It was noted within Section 2.1.4 of your SPRP (regarding spill reporting), that notifications are required if 25 gallons of a hazardous spill occurs. Please note that your ASTs will be storing both hazardous regulated substances and petroleum regulated substances. Section 245.305 states that release reporting is not required if less than 25 gallons of petroleum is released to the surface, and the owner/operator has control of the release, contains the release, and recovers the release within 24 hours. This condition does not apply to hazardous regulated substances. Hazardous regulated substances have their own respective reportable release quantity, based upon the substance. Please update the language in section 2.1.4 to reflect the release reporting requirements found in Chapter 245.

2. The following deficiencies should be corrected prior to submitting a Storage Tanks Registration/Permitting Application Form:

Description of Facility

Within your submitted SPRP is a statement, “Coastal will provide in the SPR Plan Facility Specific Requirements, as applicable, subsequent to the double wall aboveground storage tank installations.” This information should be provided to DEP for review when completed.

Description of How Plan is Implemented by Organization

The SPRP should include an organizational structure, describing the responsibilities and duties of specific individuals associated with the facility, including a detailed chain of command. Contact information should also be provided for each responsible individual.

Spill Leak Prevention and Response

This section of the SPRP should include plans for where a release is most likely to occur. It should include a site layout, indicating the location of spill kits. This section should include loading and unloading procedures for the ASTs, management of the building floor drains, details on the security of the facility, housekeeping measures, and planning for external factors, such as power outages and flooding.

Countermeasures

This section of the SPRP should include duties of specified personnel if a release occurs at the facility. The description of these actions should be for both Coastal employees and any outside contractors that may need to be deployed. Alarm and communication systems should also be discussed in this section, along with evacuation plans and emergency equipment available onsite. Provide information regarding any emergency response contractors who have been arranged to provide prompt service to the facility in the event of a release.

It is understood that many of the above-mentioned deficiencies and omissions were to be completed after the ASTs are installed at the facility. However, DEP will be unable to properly register your ASTs and subsequently unable to issue operating permits until the SPRP is complete. Please submit a revised SPRP with the necessary information, addressing the concerns above.

Please submit the items identified in section 1 by August 2, 2019 so that technical review of the SSIP application may continue.

If you have any questions or concerns, please contact me at 717-783-2403 or elingle@pa.gov.

Sincerely,



Eric Lingle, Chief
Registration, Certification and Permitting Section
Division of Storage Tanks

cc: Bernard Beegle, P.G. – Advanced Geoservices Corp.
Steve Webster, PA DEP NCRO
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