

INTEGRATED POLLUTION PREVENTION PLAN

For

**Magnolia Landfill
15140 County Road 49
Summerdale, Baldwin County, AL 36580**

Submittal Date:

April 2021

Submitted by



Engineering. Environmental. Answers.

ORIGINAL DATE OF PLAN: FEBRUARY 2015

DATE OF LAST PLAN AMENDMENT/P.E. CERTIFICATION: APRIL 2021

DATE OF LAST PLAN REVIEW: APRIL 2021

**DESIGNATED PERSON ACCOUNTABLE FOR SPILL PREVENTION:
MR. ED FOX**

CERTIFICATION

By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established, and that the Plan is adequate for the facility. This certification does in no way relieve the owner and operator of the facility of his or her duty to fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112.

Engineer: David Dailey, PE

Signature: _____

Registration Number:

State: Alabama

Date: _____

MAGNOLIA LANDFILL

INTEGRATED POLLUTION PREVENTION PLAN EMERGENCY RESPONSE PERSONNEL AND PHONE NUMBERS

Contact Person	Title	Office #	Main Phone #
Ed Fox	Deputy Director	(251) 972-6878 (251) 937-0249	(251) 331-0596
Terri Graham	Director	(251) 972-6878 (251) 937-0249	(251) 331-4158
Baldwin County Commission	Owner	(251) 937-0249	N/A

Emergency Contacts

E911

**National Response Center
Alabama Department of Environmental Management
US EPA Region IV Branch Chief (8:00 am-5:00 pm m-f)
US EPA Region IV Spill Reporting (24 hr Number)
Hazardous Materials/Waste Incidents**

911

**1-800-424-8802
1-334-271-7700
1-800-241-1754
1-404-562-8700
1-800-843-0699**

Emergency Services

**Summerdale Fire Department
Baldwin County Emergency Management Agency
Summerdale Police Department
Baldwin County Sheriff's Department
Alabama Highway Patrol-Mobile Office
South Baldwin Regional Medical Center**

**911 or 251-989-6723
911 or 251-972-6807
911 or 251-989-6446
911 or 251-937-0202
251-660-2300
251-949-3400**

Emergency Spill Cleanup Contractors

CDG Engineers & Associates

1-888-258-2584

INTEGRATED POLLUTION PREVENTION PLAN

For

**Magnolia Landfill
Summerdale, Baldwin County, Alabama**

Date of Plan/Implementation	February 2015
Last Plan Review Date	April 2021

**Note: This plan supersedes all other previous versions issued or once used by the company*

Designated Person Accountable for Spill Prevention:

Ed Fox, Deputy Director

LIMITATION STATEMENT

The information described within this Integrated Pollution Prevention Plan has been developed from oral/written information provided by the facility representatives, physical observations during field work conducted and CDG Engineers and Associates (CDG) interpretation of applicable regulations. CDG will not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this plan was prepared. This plan was solely prepared for the Magnolia facility. The facility may release the information to other third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall be solely at the risk of such third party and without legal recourse against CDG, or its respective employees, officers or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort, statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

INTEGRATED POLLUTION PREVENTION PLAN REVIEW DOCUMENTATION PAGE

In accordance with 40 CFR 112.5 and the provisions of the facility's NPDES (**AL0069345**), a review and evaluation of this Integrated Pollution Prevention Plan is conducted at least once every five years. As a result of this review and evaluation, the landfill will amend the Plan within six months of the review to include more effective prevention and control technologies if the technology will significantly reduce the likelihood of a spill event from the facility, and the technology has been field proven at the time of the plan review. Implementation of amendments made to this plan will be carried out as soon as possible, but no later than six months following the preparation of any amendment. Any technical amendments to this plan will require certification by a licensed Professional Engineer in accordance with 40 CFR 112.3.

Documentation of IPP Plan Review and Evaluation

Review Dates	"I have completed review and evaluation of the Plan for Magnolia Landfill <u>Signature of Reviewer</u>"	**Are amendments to the Plan required based on the review/evaluation for this date (<u>YES/NO</u>)
April 2021		

** Amendments required will be documented on the revision history log of this plan to track the revision history of this document.

MANAGEMENT APPROVAL

Magnolia Landfill is committed to the prevention of discharges of oil into navigable waters and the environment and maintains high standards for spill prevention control and countermeasures through regular reviews, updating, and implementation of this Integrated Pollution Prevention Plan for the landfill facility.

Authorized Facility Representative: _____

Signature: _____ Date: _____

Title: _____

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1.0 Purpose of Integrated Pollution Prevention Plan

The purpose of this Integrated Pollution Prevention Plan (IP3) is to address the Federal and State regulations governing industrial/commercial facilities that have the potential to discharge oil or other pollutants into navigable waters or the municipal storm water system.

Federal regulations require the completion of a SPCC plan to comply with 40 CFR 112.7, EPA Regulations on Oil Pollution Prevention, for any industrial/commercial sites that store, transfer, and/or consume oil above the regulatory threshold and have the potential to discharge that oil into navigable waters of the United States. As per 40 CFR 112.5, whenever there is a change at the facility that affects the potential for discharge of oil into navigable waters, the SPCC sections of this plan shall be amended. If no changes have occurred, then the plan shall be reviewed and recertified every **five (5)** years and documented on the **Review Documentation Page** at the beginning of this plan on **page ii**.

A National Pollutant Discharge Elimination System (NPDES) Permit (**provided in Appendix F**) is required of industrial/commercial facilities which discharge storm water associated with industrial activities. Federal Regulation 40 CFR Part 112.26(b)(14) outlines NPDES permitting requirements for storm water discharges. Implementation of the NPDES permitting program for storm water discharges is the responsibility of the Alabama Department of Environmental Management (ADEM). Part IV of the NPDES Permit outlines the requirements for the development of a BMP Plan.

2.0 FACILITY OWNER AND OPERATOR INFORMATION

2.1 Facility Owner

Baldwin County Commission
312 Courthouse Square, Suite #12
Bay Minette, Alabama 36507

Office: (251) 937-0264

Cell: (251) 580-2582

2.2 Name and Location of Facility

Magnolia Landfill
15140 County Road 49
Summerdale, AL 36580

2.3 Designated Person Responsible for Spill Prevention

Mr. Ed Fox – Deputy Director

Office: (251) 972-6878

Cell: (251) 331-0596

3.0 FACILITY DESCRIPTION

3.1 Facility Operations

Magnolia Landfill is located in a rural area at 15140 County Road 49 in Summerdale, Baldwin County, Alabama. The site is comprised of approximately 584 acres of land and is bordered by residential properties. The site includes multiple office and maintenance buildings, which are utilized in the daily operations of the Magnolia Landfill. The property was formerly used as an Outlying Landing Field (OLF) by the United States Navy.

The facility's petroleum storage areas include a maintenance/lubricant storage facility, household waste sorting facility, and a building utilized to oil storage generated by the public. The facility also includes an animal shelter. Petroleum-based fuel products are stored in five ASTs located at different areas on the property. Petroleum products are received at and transported from the facility via common carrier tank trucks. All fuel transfer operations are manually initiated and monitored by Magnolia Landfill Personnel.

The standard hours of operation for this facility are below.

Monday-Friday, 7:00 AM until 5:00 PM

Saturday, 7:00 AM until 12:00 PM

Figure 1 (Topographic Map of Summerdale, AL) in **Appendix A** provides the location of the Magnolia Landfill facility.

Figure 2 (Site Property Boundary Map) in **Appendix A** provides a facility layout at the Magnolia Landfill facility.

Figure 3A (AST Locations) in **Appendix A** provides a layout of the bulk fuel containment areas at the Magnolia Landfill facility.

Figure 3B (AST Detail) in **Appendix A** provides a layout of the bulk fuel containment areas at the Magnolia Landfill facility.

3.2 Facility Bulk Oil Storage

The design and construction of the bulk storage containers are compatible with the characteristics of the product they contain, and with temperature and pressure conditions.

The tank capacities and types of oil products stored in bulk at the Magnolia facility are provided in **Table 1** below.

Table 1			
Bulk Aboveground Storage Tank Information			
Tank Identification Number	Product Stored	Capacity (gallons)	Discharge Prevention Method
1	On-road Diesel Fuel	10,000	Double Walled
2	Unleaded Gasoline	1,000	Double Walled
3	On-road Diesel Fuel	1,000	Double Walled
4	Hydraulic Oil	200	Secondary Containment
5	Motor Oil	200	Secondary Containment

3.3 Oil Storage Containers

Magnolia Landfill maintains an inventory of both hydraulic oil, and lubricants in 55-gallon drums, 30-gallon drums, cases, and buckets. These products are stored within the maintenance shop area at the facility as shown in Figure 2. Additionally, one 325-gallon tote containing waste oil is located within the secondary containment. Diesel exhaust fluid is also stored in 330-gallon totes at different areas on the property.

3.4 Drainage Pathway and Distance to Navigable Waters

The Latitude and Longitude coordinates for the front gate of the property are 30 26' 36" North, 87 46' 25" West. The property primarily drains to the south and into the storm inlets located south of the office and maintenance buildings illustrated in Figure 2. Drainage from the storm system is ultimately discharged to an unnamed tributary of Barner Branch which is within the Fish River Basin.

4.0 SPILL HISTORY

This section provides documentation of oil product spills/releases experienced during the operational life of the facility. There have been no reported spills related to the operation of the facility at the time of this Plan revision/update.

Table 2 Oil Discharge History		
Description of Discharge	Corrective Actions Taken	Plan for Preventing Recurrence

Any spills that occur during future operations of the facility will be recorded on the form located in **Appendix B** of this plan. Information to be included will consist of:

- Date of release;
- Amount of material released;
- Type of product released;
- Cause of the discharge including a failure analysis of system(s) in which the failure occurred; and
- Preventive measures taken to minimize the possibility of recurrence.

Spills/releases will trigger review, evaluation and update of this Plan if improvements in engineering controls or procedures are identified to reduce the likelihood of recurrence.

5.0 OIL DISCHARGE PREVENTION MEASURES PROVIDED

5.1. Drainage Control and Diversionary Structures

The Magnolia Landfill facility has two bulk storage areas for ASTs. The bulk storage area that adjoins the maintenance building and contains two 200-gallon single wall ASTs and a 325-gallon tote containing waste oil. The ASTs and tote are enclosed by a rectangular shaped concrete block secondary containment. The secondary containment area is covered and protected from precipitation. The area of the secondary containment is approximately 302 square feet at an average

depth of 2.67' providing an overall capacity of 5,040 gallons. After discounting the volume of the structures within the containment area, the bulk storage area will sufficiently contain a release equal to the largest storage tank within the containment system. Calculations of the storage capacity for the bulk storage containment are provided in **Appendix E**.

5.2 Loading/Unloading Areas

All bulk oil products are delivered to or sent out from the Magnolia Landfill facility via common carrier tanker trucks. Magnolia Landfill personnel work with the truck drivers to ensure that all loading/unloading operations are in accordance with applicable DOT regulations. All loading/unloading operations are attended and closely monitored by a designated employee to ensure limited environmental exposure in the event of oil spillage.

ASTs are filled only when a representative from Magnolia Landfill is present at the unloading area. Designated facility personnel will inspect tank product levels prior to authorizing filling operations to ensure adequate capacity is available in the tank receiving product. The following procedure will be followed during product deliveries to the onsite ASTs:

1. Ensure the truck and trailer brakes are applied. Put in place a system to prevent accidental vehicular departure prior to disconnection of transfer lines. This can be a physical barrier like the use of wheel chocks.
2. Apply grounding cable, if available.
3. Check tank level to ensure product will not overfill tank.
4. Ensure correct product is being discharged in the correct tank.
5. Connect product hose, open belly/hand valves and discharge product.
6. After compartment is empty, discharge remaining product from product hose into tank drop. Secure fuel/lubricant drop equipment into proper storage area for transport.
7. Secure tank and check vehicle for any possible leaks or discharges before traveling back through the landfill facility.
8. During Vendor Unloading Procedures the driver of the vehicle is to remain within 50 feet of the vehicle at all times. This is to monitor the entire unloading process and for accidental spills, ruptures or overfills of product.

In the event of a release during petroleum product loading/unloading operations, spill containment material will be located where it is readily available for response.

5.3 Product Inventory Control

Storage tank inventory is routinely monitored to verify available capacity. Prior to bulk fuel deliveries, storage tank levels are measured by landfill personnel to verify the tanks have the available capacity to receive the volume of delivery or transfer.

6.0 BEST MANAGEMENT PRACTICES (BMPs)

6.1 Selected Site Specific BMPs

An assessment was conducted to determine the presence of specific situations, practices, and processes that could result in storm water contamination at the landfill facility. The following table provides the selected best management practices by type and describes how they apply to each of the potential sources of storm water pollutants found at the facility.

Sanitary Landfill (Site Specific BMPs)	
Pollutant Source	Selected BMPs
Exposure of waste	• Minimize the area of exposed open face as much as is practicable. • Divert flows around open face using structural measures such as dikes, berms, swales, or pipe slope drains. • Maintain the integrity and effectiveness of any intermediate or final cover (including repairing the cover as necessary to minimize the effects of settlement, sinking, and erosion). • Regularly inspect erosion and sediment controls.

Erosion and Sediment Control	<u>Vegetation</u> • Stabilize soils with temporary seeding, mulching, and placing geotextiles on the inactive portions of the site. • Keep as much vegetation as possible when building roads and seed as necessary and appropriate. • Construct vegetated swales along road. <u>Run-off Controls</u> • Implement structural controls as indicated on Engineering Plans to convey runoff, to divert storm water flows away from areas susceptible to erosion, and to prevent sediments from entering water bodies. • Confine stockpiling to areas outside of drainage pathways and away from surface waters • Stabilize haul roads and entrances to landfill with gravel or stone. • Frequently inspect all stabilization and structural erosion control measures and perform all necessary maintenance and repairs. <u>Sedimentation Basin</u> • Maintain sedimentation basin to prevent run-off of contaminants from the facility. • Remove accumulated sediment periodically to maintain effective storage volume. Sediment will be removed when it has accumulated to within 18 inches of the lowest openings in the outfall structure. • Conduct regular inspections of the outlet structures, dike embankments, and entrance points to prevent erosion or blockages that could result in dike failure or damage during storm events.
Outdoor Vehicle and Equipment Storage and Parking	• Store vehicles and equipment indoors when possible. • Cover the storage area with a roof. • Provide diversion berms, dikes or grassed swales around the perimeter of the area to limit run-on. • Use drip pans under all vehicles and equipment waiting for maintenance. • Use absorbents for dry cleanup for spills and leaks. • Regularly sweep area to minimize debris on the ground. • Provide dust control if necessary. • Inspect the storage areas to ensure BMPs are implemented.

Vehicle Washing	• Avoid washing parts or equipment outside. • Confine activities to designated areas outside drainage pathways and away from surface waters. • If washing outdoors, cover the cleaning operation and ensure that all washwaters drain to the intended collection system. • Collect storm water runoff from the cleaning area and provide treatment or recycling. • Inspect cleaning area regularly to ensure BMPs are implemented and maintained. • Train employees on proper washing procedures.
Liquid Storage in ASTs	• Store materials inside when feasible. • If area is uncovered, connect sump outlet to sanitary sewer (if possible) or an oil/water separator, catch basin filter, etc. If connecting to a sanitary sewer check with the system operator to ensure that the discharge is acceptable. If implementing separator or filter technologies, ensure that regular inspections and maintenance procedures are in place. • Develop and implement spill plans. • Train employees in spill prevention and control. <u>Above ground tanks</u> • Provide secondary containment, such as dikes, with a height sufficient to contain a spill (110 percent of the volume the largest tank). • If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position. Institute protocols for checking storm water in containment area prior to discharge • Use tanks with overflow protection. <u>Portable containers/drums</u> • Store drums indoors when possible. • Store drums, including empty or used drums, in secondary containment with a roof or cover (including temporary cover such as a tarp that prevents contact with precipitation). • Provide secondary containment, such as dikes or portable containers, with a height sufficient to contain a spill (110 percent of the volume contained in the largest tank).

	• Clearly label drums with their contents. • Train employees on proper filling and transfer procedures
Petroleum Loading/Unloading	• Confine loading/unloading activities to designated areas outside drainage pathways and away from surface waters. • Provide diversion berms, dikes or swales around the perimeter of the area to limit run-on. • Avoid loading/unloading materials in the rain or provide cover or other protection for loading docks. • Cover loading and unloading areas and perform these activities on an impervious pad to enable easy collection of spilled materials. • Slope the impervious concrete floor to collect spills and leaks and convey them to proper containment and treatment. • For transfer to/from trucks, ensure hose connection points at storage containers are inside containment areas, or drip pans are used in areas where spillage may occur. • Regularly sweep area to minimize debris on the ground.

6.2 Good Housekeeping

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with storm water. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and training employees in good housekeeping techniques.

Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices has proven to be an effective means of ensuring the continued implementation of these measures.

6.3 Visual Inspection

Regular visual inspections ensure that all elements of the BMP Plan are in place and working properly to prevent pollution of storm water runoff from the facility. Specific inspection requirements are discussed in **Section 8.2**.

6.4 Spill Prevention and Response

The Spill Prevention and Response Program include education for employee awareness and training in proper material handling and storage. The following sections summarize the specific practices and controls included in the program based on the site assessment conducted at the facility.

Spill Prevention Education

- Be aware that different materials pollute the environment in different ways and amounts. Make sure each employee knows what a “significant spill” is for each material they use, and what is the appropriate response for “significant” and “insignificant” spills.
- Educate employees on potential dangers to humans and the environment from spills and leaks.
- Hold regular meetings to discuss and reinforce appropriate disposal procedures.
- Establish a continuing education program to indoctrinate new employees.
- Designate facility employee with responsibility for overseeing and enforcing prevention and control measures.

General Spill Prevention Measures

- Spills of oil, petroleum products, and sanitary and septic wastes should be contained and cleaned up as quickly and safely as possible.
- Store hazardous materials and wastes in covered containers and protect from vandalism.
- Place a stockpile of spill response cleanup materials where it will be readily available.
- Spills should be covered and protected from storm water run-on during rainfall to the extent that it does not compromise cleanup activities.
- Do not bury or wash spills with water.

- Store and dispose of used clean up materials, contaminated materials, and recovered spill material that is no longer suitable for the intended purpose in conformance with the provisions in applicable BMPs.
- Do not allow water used for cleaning and decontamination to enter storm drains or watercourses.
- Place proper storage, clean up, and spill reporting instructions for hazardous materials stored or used on the project site in an open, conspicuous, and assessable location.
- Keep waste storage areas clean, well organized, and equipped with ample cleanup supplies as appropriate for the materials being stored.

6.5 Sediment and Erosion Prevention and Control

The site assessment identified no major activities with a potential for significant soil erosion. However, in the event that erosion and sediment control become an issue in the future, proper BMPs will need to be implemented to prevent discharges to storm water. Erosion controls such as seeding, mulching, and sodding prevent soil from becoming dislodged. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used in conjunction with erosion control BMPs.

7.0 DISCHARGE COUNTERMEASURE PROCEDURES

This section describes the response and cleanup procedures in the event of a product discharge. The uncontrolled discharge of fuel or oil to groundwater, surface water, or soil is prohibited by state and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

7.1 Identification/Notification

The guidelines noted below will be followed in the event of a spill or other discharge of fuel and/or other hazardous substance.

- Any employee who discovers a discharge of oil and/or other hazardous substance should determine the source of the spill. If the source of the spill is immediately obvious, the employee should report the spill to **the Landfill Deputy Director, Mr. Ed Fox.** Designated landfill personnel will determine the

cause of the discharge, take action to clean up the spill, and implement measures to prevent a recurrence. In the event the release is beyond the response capabilities of on-site resources, the spill response contractors listed on the Emergency Contact List will be notified to mobilize to the site and provide support.

- If a spill occurs, is not fully contained, and has the potential to reach the waters of the United States, the Deputy Director or alternate should be notified immediately who will in turn notify the appropriate agencies identified on the **Emergency Contact List** provided in **Section 1.0** when required.

The designated Magnolia Landfill representatives will notify appropriate officials provided in **Section 1.0** as appropriate. The following information should be provided:

- Exact address or location and phone number of the facility;
- Weather conditions; or probability of rainfall;
- Date and time discharge began;
- Type of material discharged;
- Estimates of the total quantity discharged;
- Source of the discharge;
- Cause of discharge;
- Condition of container;
- Description of all affected media;
- Damages or injuries resulting from the discharge;
- Actions being taken to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted

In accordance with 40 CFR 112.3, discharges of oil products in volumes greater than **1,000 gallons** in a single event or **42 gallons** in each of two events into navigable waters within a twelve-month period will require notification to the EPA Regional Administrator within 60 days of the event. Information required to be submitted will be as follows:

- 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 countermeasures 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.

Facility Response Plan

Pursuant to 40 CFR 112.20, owners or operators of an oil storage facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on navigable waters must prepare and submit a facility response plan (FRP) to the EPA Regional Administrator.

EPA has developed “Substantial Harm” criteria found in 40 CFR 112 Appendix C to apply in evaluating whether a facility is subject to the FRP requirements of 40 CFR 112.20. If a facility meets any of the identified criteria, the owner/operator is required to prepare and submit a FRP to the EPA Region IV Administrator for review and approval. The Substantial Harm Criteria Checklist and certification of applicability has been included as **Appendix C**. Based on information provided by the landfill, the facility **is not subject** to the requirements of 40 CFR 112.20.

7.2 Containment and/or Collection

Once the discharge has been identified and reasonable efforts have been made to stop further discharge, containment methods should be employed. Barriers, and/or absorbent pads and absorbent materials should be used, if necessary, to prevent the discharge from reaching storm-water conveyance systems or off-site areas.

In extreme situations, an emergency spill cleanup contractor may be contacted to assist in cleanup. A list of potential spill cleanup contractors is provided in the **Emergency Contact List**.

Based on an overall evaluation of the release, collection and disposal of the discharged product may be appropriate. Equipment and materials available onsite may be utilized to contain and collect the discharged product. Available on-site spill response equipment that can be utilized to respond to a release is discussed in **Section 6.3**.

7.3 Spill Response Material/Equipment

The Magnolia Landfill facility maintains spill response materials on-site to add in the response in the event of an oil release. An inventory of the spill response materials available for use at the landfill facility as well as its location is contained in the table below.

Table 5		
Spill Response Material/Equipment		
Description of Response Equipment	Minimum Quantity to be Maintained	Location of Equipment
Oil-Dri	(5) 50-pound bags	Warehouse
Oil Absorbent Pads, Pillows, and/or Booms	(5) packs	Warehouse

7.4 Recovered Material Management

Once the discharge material has been adequately contained and/or collected, the designated representative should determine the most feasible method for handling the discharged material. Options that should be considered include collection of petroleum containing liquids and transferring off site for petroleum recovery and collection of petroleum residue debris/soil and transporting to an approved treatment/disposal facility.

An accurate log of the date, time, personnel, equipment and sequence of events regarding spill response and cleanup will be documented and kept on file. This information will be utilized to audit the effectiveness of this SPCC Plan.

The following alternatives should be considered for disposal, based upon the feasibility of each method:

- Reclamation or reprocessing of recoverable oil products at a permitted approved reprocessing facility; and/or
- Disposal of oil residue and oil contaminated materials at a RCRA treatment/disposal facility permitted to accept such material.

7.5 Potential Spill Prediction

This facility is provided with spill containment structures for storage tanks used to contain petroleum products. These containment structures are intended to prevent spillage from reaching and entering navigable water. However, because there is a reasonable potential for equipment failure that could cause a release, the following table has been provided to comply with the requirements of 40 CFR 112.7(b).

The predictions described are based upon the failure of normal storage facilities and the additional failure of collection and containment facilities that prevent spillage from escaping the facility. **Table 6** includes a description of oil storage capacity, the most likely type of failure, estimated flow rate, and estimated total quantity of fuel that could be discharged as a result of the type of failure. Assumptions used to arrive at these volumes have been included.

This table should be used in conjunction with the above referenced figure to aid in response to a release.

Table 6 Potential Spill Prediction Type of Release: Tank Rupture, Leak, or Overfill				
Area/Activity Description	Storage Capacity	Type of Failure	Estimated Release Rate in Gallons per Minute (gpm)	Estimated Release Volume in Gallons
On-road Diesel Fuel Tank #1	10,000	Rupture	166.67	10,000
		Leak	6.94	2,500
		Overfill	90	45
Regular Unleaded Gasoline Tank #2	1,000	Rupture	16.67	1,000
		Leak	0.69	250
		Overfill	90	45
On-road Diesel Fuel Tank #3	1,000	Rupture	16.67	1,000
		Leak	0.69	250
		Overfill	90	45
Hydraulic Oil Tank #4	200	Rupture	3.33	200
		Leak	0.14	50
		Overfill	10	5
Motor Oil Tank #5	200	Rupture	3.33	200
		Leak	0.14	50
		Overfill	10	5

Notes:

1) *Rupture-Release rate-based tank failure that would empty the tank contents within 1 hour.*

2) *Leak- Release rate based on the rate required to empty the tank in a 24-hour period.*

Total volume base on a maximum detection/response time of 6 hours for tanks.

3) *Overfill- Release rates based on a delivery rate of 90 and 10 gpm. Release volume based on 30 second response time.*

8.0 INSPECTIONS, TESTS AND RECORDS

In order to continually revise and improve the Landfill Pollution Prevention Plan, BMPs implemented should be routinely evaluated to ensure they are effective at preventing or diminishing storm water contamination.

This is accomplished by conducting inspections and/or testing to observe activities and conditions at the facility as well as collecting storm water quality monitoring data. The followings sections describe the methods utilized to evaluate the effectiveness of this program.

8.1 Inspection of Storage Tanks and Containment Areas

Visual inspections of the product storage equipment will be conducted by Landfill personnel on a daily basis to verify the integrity of the operation. The visual inspections may include but are not limited to the following items:

- Physical condition of storage tanks;
- Condition of transfer piping and associated equipment;
- Inspection of containment areas for cracks/damage and the presence of petroleum products; and
- Conditions that may affect the performance of the containment system or hinder the inspection.

The results of these daily inspections will not be documented unless a problem is identified. A more thorough inspection will be conducted on a monthly basis utilizing the inspection form found in **Appendix D**. Inspection records will be signed by the appropriate personnel and forwarded to the Deputy Director, Mr. Ed Fox, who will review and ensure appropriate corrective actions have been implemented when required. The results of these inspections will be maintained on file for a period of three years.

8.2 Facility BMP Inspections

A minimum of two facility inspections will be required per week to ensure that BMPs are continually implemented and are effective as required by the facility's NPDES Permit. The inspections will focus on any structures that are utilized to prevent storm water pollution or to remove pollutants from storm water as well as the general condition of the facility.

Inspections will be documented on the inspection forms provided as **Appendix D** and will be maintained at the facility to comply with conditions of the ADEM issued Storm Water Permit and this Plan. Deficiencies identified will be reported to senior

management and a corrective action plan will be developed to address the deficiency.

8.3 Aboveground Storage Tank Integrity Testing

40 CFR 112.8(c)(6) (July 2002 Revision) requires integrity testing of bulk containers “on a regular schedule.” The regulations further provide that visual inspections must be combined with another non-destructive testing technique to verify the structural integrity of the container. In March 2004, a settlement agreement was executed between EPA and the American Petroleum Institute (API) specifically clarifying EPA’s position on integrity testing of shop-built containers.

EPA stated in the settlement agreement that well-designed shop-built containers with a capacity of 30,000 gallons or less would be generally provided with equivalent environmental protection to that offered by other forms of testing if appropriate visual inspections were combined with the measures described below:

- Elevation of a shop-built container in a manner that decreases corrosion potential (as compared to a container in contact with soil) and makes all sides of the container, including the bottom, visible during inspection (e.g., where the containers are mounted on structural supports, or saddles).
- Placement of a barrier between the container and the ground, designed and operated in a way that ensures that any leaks are immediately detected.

Per the STI SP001-03, a Category 1 Shop-Fabricated AST that contains between 5,001 and 50,000 gallons would be subject to periodic AST inspections and a Formal external inspection by a certified inspector every twenty (20) years.

There is one storage tank currently utilized at the Magnolia Landfill facility that is greater than 5,000 gallons in capacity. Therefore, the facility **will be** subject to the formal external inspection requirement. To initiate the program, the manufacture date of this tank should first be determined. This information should then be used to schedule a formal external inspection on each of these tanks prior them reaching 20 years in age to comply with the STI SP001-03 Standard.

As a best management practice, it is recommended to also include any remaining

storage tanks in this inspection program to verify the continued structural integrity of these tanks.

Tank tests and inspections conducted at the facility shall be retained on site for the useful life of the storage tank.

8.4 Field-Constructed Aboveground Containers

There are no field-constructed aboveground containers utilized at the Magnolia Landfill facility.

8.5 Storage Area Inspections

Outside fuel storage tanks are double-walled constructed to provide secondary containment, and therefore are not required to be surrounded by a containment dike. Additionally, the secondary containment area adjoining the maintenance facility is covered and protected from stormwater. Formal inspections of the tank exteriors, interstitial space, etc. will be performed as part of the monthly facility inspections. The Inspection Log provided in Appendix D.

8.6 Product Overfill Protection

Magnolia Landfill personnel are present throughout the filling operations to monitor the product level in the tanks. Audible and visual overfill alarms should indicate when the tank has reached 90% capacity.

8.7 Spill Response Equipment

An inventory of the spill response materials/equipment available for use at the Magnolia Landfill facility as well as its location is discussed in **Section 7.3**. Inspection of locations will be conducted by designated facility personnel as part of the monthly facility inspection to ensure the areas remain adequately stocked. Items identified that need to be replaced will be noted on the **Monthly Facility Inspection Form** included in **Appendix D** and forwarded to the **Site Deputy Director, Mr. Ed Fox**, for follow-up.

8.8 Recordkeeping and Internal Reporting

The landfill records and maintains records of relevant spills, leaks, inspections, and maintenance activities. The Environmental Services Department is responsible for maintaining all records pertinent to storm water pollution prevention for a minimum of one year beyond the expiration date of this permit. These records include the following documents:

- Copy of the ADEM NPDES permit;
- Integrated Pollution Plan and all revisions of the Plan;
- Copies of site inspections conducted to comply with the Permit and this plan;
- Monitoring records required by the Permit;
- Records of spills/leaks as well as the corrective actions taken to prevent recurrence;
- Weekly inspections required by Part IV.A. of the Permit;
- All inspections performed and any corrective actions taken for the last three years and each entry shall be signed by the person performing the inspection and any corrective actions taken; and
- Training records for any personnel required to implement this Plan at the facility.

Records generated will be retained for a minimum of one year past the expiration of the permit.

9.0 FACILITY MONITORING REQUIREMENTS

As specified in the facility's NPDES Permit, the landfill is required to monitor certain effluents associated with each discharge area. Each discharge is listed in the attached permit.

An **Annual Certification** must be submitted to ADEM by **January 28th** that all discharges, during the preceding year, associated with the above were in accordance with the conditions of the permit.

9.1 Sampling Requirements

All storm water samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches. The storm water event must be monitored, including the date and rainfall (in inches) for the storm event(s) sampled.

The duration between the storm event sampled and the end of the previous measurable (greater than **0.1-inch** rainfall) storm event must be a minimum of **72 hours**. This information must be recorded as part of the sampling procedure and records retained according to NPDES Permit.

During the sampling storm event, rainfall must be reported and may be measured using a rain gauge. This information must be recorded as part of the sampling procedure and records retained according to the permit. A copy of the NPDES Permit has been included as **Appendix G**.

A grab sample, when required by the permit, shall be taken during the first thirty minutes of the discharge (or as soon thereafter as practicable); and a flow weighted composite sample, if required by this permit, shall be taken for the entire event or for the first three hours of the event.

9.2 Reporting Requirements

Analytical results from monitoring conducted will be submitted to ADEM as specified in Part I.C of the Permit. The results will be recorded on the Discharge Monitoring Report form and must be submitted by utilizing the ADEM Electronic Environmental (E2) reporting system.

10.0 SITE SECURITY

10.1 Fencing/Camera Surveillance/Tank Security

The Magnolia Landfill is completely enclosed by a security fence. The main gates that control the entrance and exit into this area are locked and secured during non-operating hours with a padlock.

10.2 Lighting Adequate to Detect Spills

Facility lighting at the Magnolia Landfill facility shall be utilized and located in a manner to assist both operating personnel in daily operations and discovery of discharges occurring during hours of darkness. Facility lighting shall completely illuminate the aboveground storage tank area and unloading area. This lighting will also assist the general public and law enforcement in the discovery of possible discharges.

11.0 PERSONNEL TRAINING PROCEDURES

11.1 Personnel training

All new hires are required to review the oil spill prevention and response guidelines at the time of hire. This document is signed and filed in the personnel folder of each new hire. In addition, all new hires receive on the job instruction from personnel familiar with our spill prevention and response procedures. As a means of refresher training, these same spill prevention and response procedures, along with other new or important spill prevention information, are periodically reviewed at our monthly safety meetings. The minutes of these meetings are maintained and available for review upon request.

Employees involved in handling petroleum products will receive training as part of their orientation program. All employees involved in the operation and maintenance of equipment will be instructed in methods and actions to prevent discharge of petroleum or petroleum by-products as part of this training program. In addition, all personnel involved in the management of petroleum products will be instructed in the following:

- Overview of the IP3 and its purpose;
- Operation and maintenance of equipment to prevent petroleum discharge and the pollution of storm water;
- Applicable pollution control laws, rules, and regulations;
- Fluid level monitoring in tanks;
- Material delivery monitoring/observations;
- Inspection/recordkeeping requirements; and
- Spill response procedures.

11.2 Designated Person Accountable for Spill Prevention

The person who is responsible for oil spill prevention, personnel training, and the overall implementation of this Plan is the **Deputy Director, Mr. Ed Fox**. Though responsible for the overall implementation, the Deputy Director may delegate certain responsibilities as he deems appropriate.

11.3 Spill Prevention Briefings

Spill prevention briefings will be conducted on an annual basis at the facility. These briefings will cover the following areas:

- Review of the plan to assure personnel have an adequate understanding of the contents of the plan;
- Discussion of any known spill events or failures, malfunctioning components; and
- Recently developed precautionary measures to aid in spill prevention.

Documentation of these briefings will include the date of the briefing, attendees and items covered during the meeting. This documentation should be retained and filed at the facility for future reference.

12.0 Facility Tank Truck Loading/Unloading

Magnolia Landfill requires all drivers to comply with Department of Transportation (D.O.T.) requirements and facility loading/unloading procedures. All drivers must be authorized to load or unload product in accordance with this regulation.

ASTs will never be filled without a representative from the Landfill present at the unloading area. Personnel will inspect tank product levels prior to authorizing filling operations to ensure adequate capacity is available in the tank receiving product. ASTs will never be filled beyond 90% to provide an additional level of protection against overfilling. Any vehicles preloaded at the facility must remain in containment and be secured. **Section 5.2** details tanker truck loading/unloading procedures at the facility.

13.0 FACILITY TRANSFER OPERATIONS

13.1 Transfer Piping Management

All transfer lines will be capped or blank-flanged at the termination point when not in use and identified as to its source. Pipe supports will be designed and installed to minimize abrasion and corrosion and to allow for expansion and contraction due to temperature changes. Transfer lines will be located to protect against damage from vehicular traffic.

Aboveground piping, valves and appurtenances will be inspected on a routine basis as part of the monthly facility inspection to verify their integrity. Integrity concerns noted during these inspections will be noted on the inspection form and forwarded to the Deputy Director for follow-up.

14.0 DOCUMENT REVISION STATUS AND DISTRIBUTION

14.1 REVISION HISTORY LOG

[illegible]

Figures



APPENDIX A

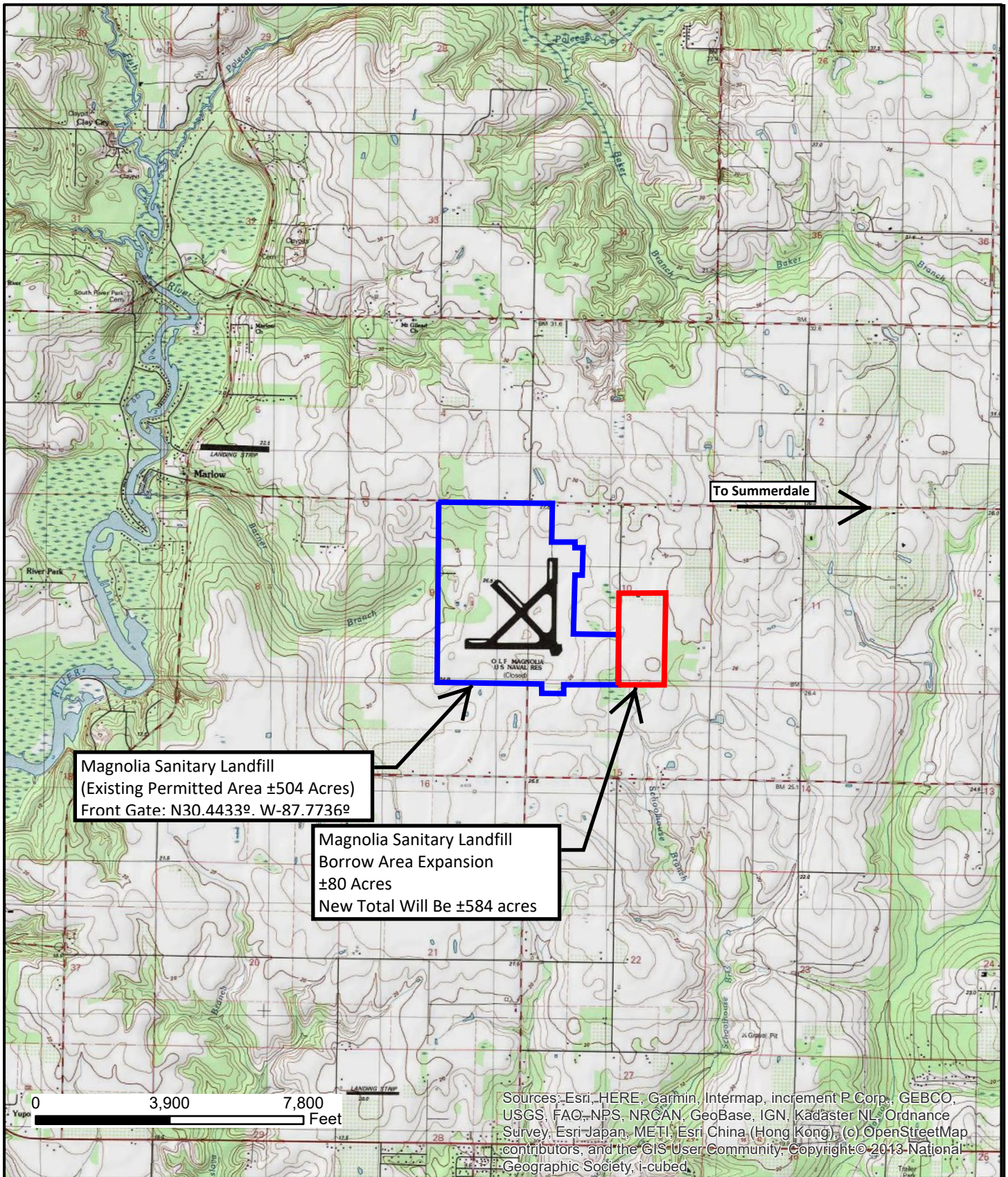


Figure 1 - USGS Topographic Map

MAGNOLIA SANITARY LANDFILL
Baldwin County, Alabama



Engineering. Environmental. Answers.
www.cedge.com

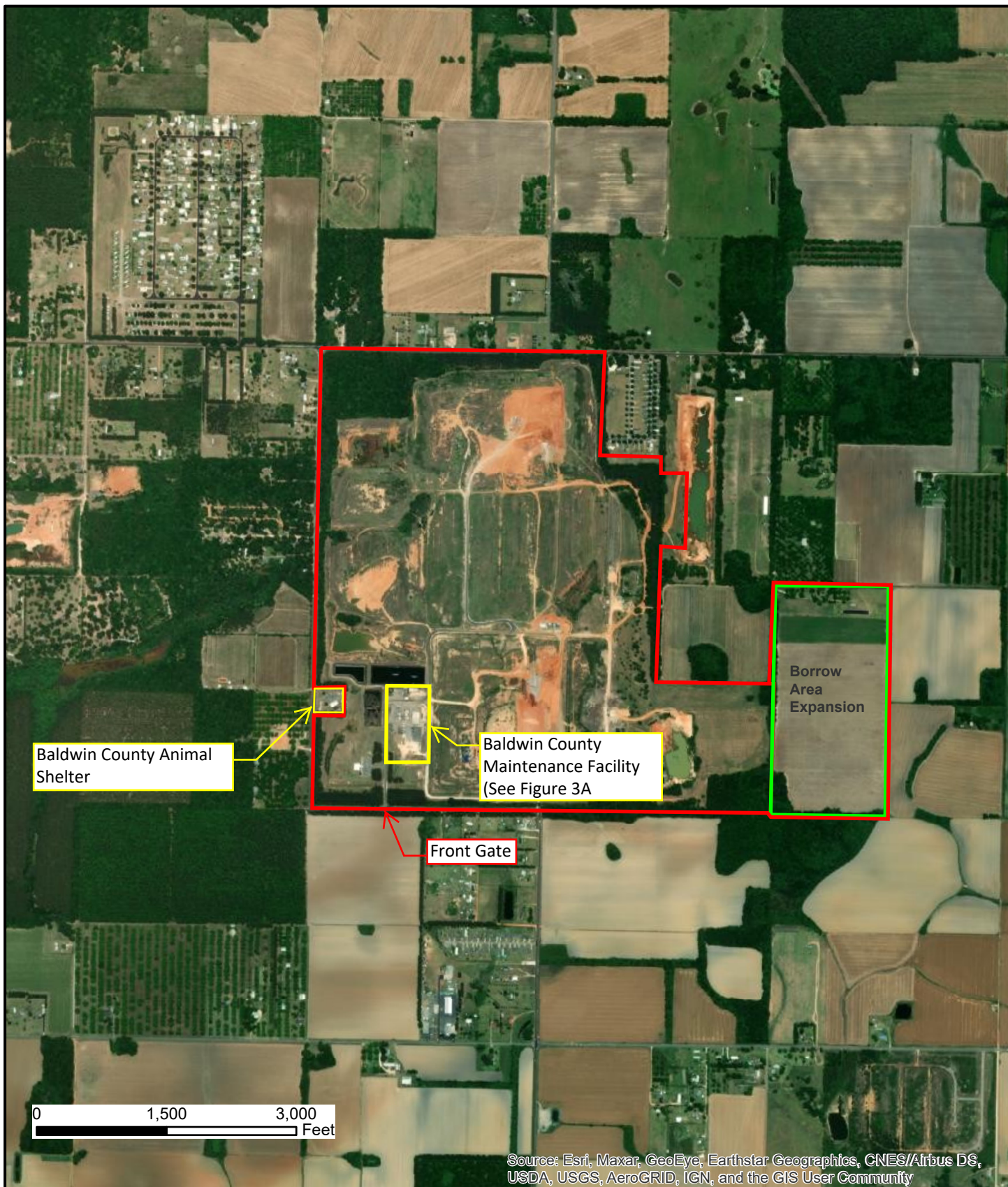


Figure 2 - Site Property Boundary

MAGNOLIA SANITARY LANDFILL
Baldwin County, Alabama



Engineering. Environmental. Answers.
www.cdge.com



Figure 3A
Baldwin County Maintenance Facility Showing AST Locations

Magnolia Landfill
15140 County Road 49
Summerdale, Baldwin County, AL



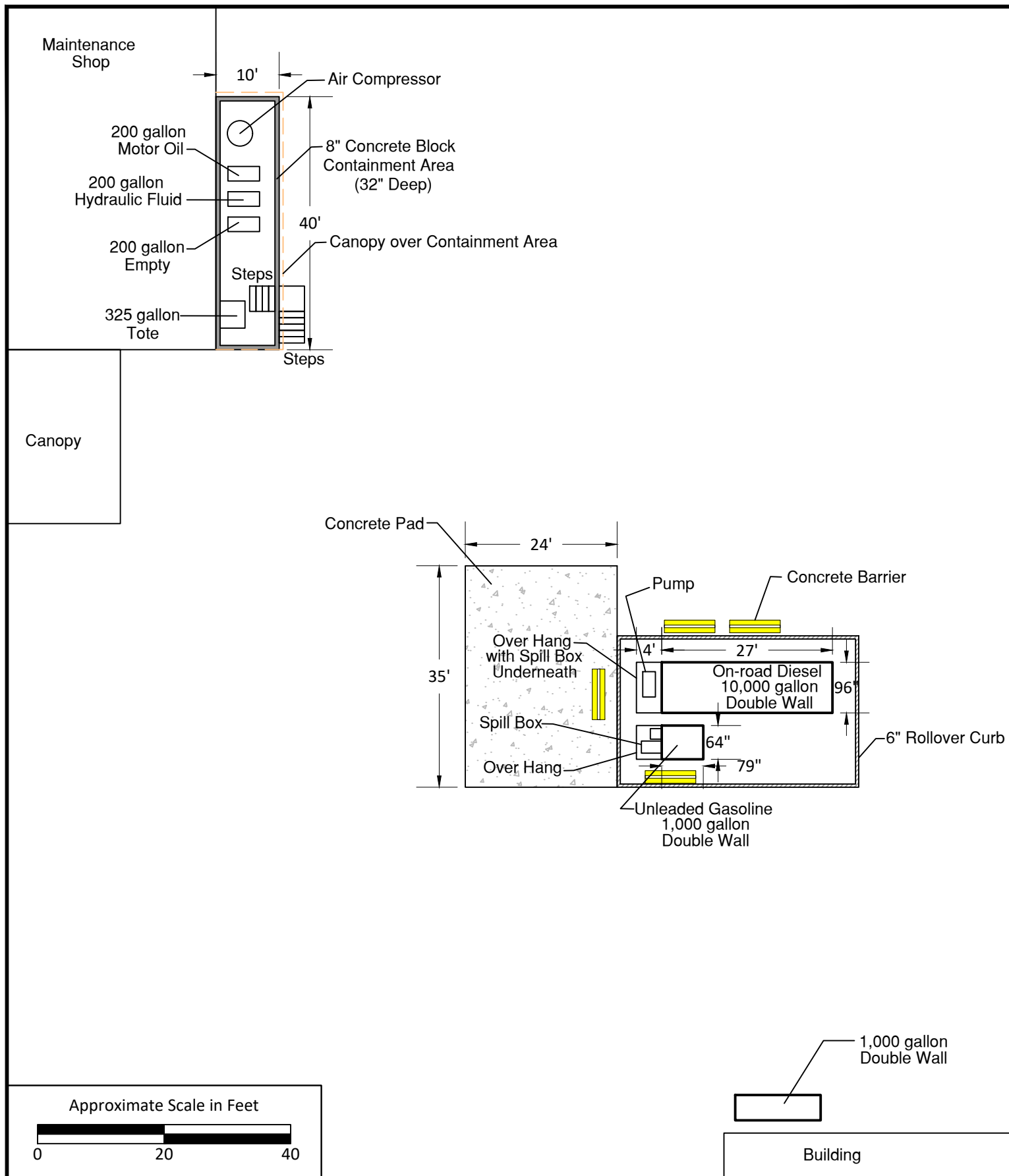


Figure 3B
Baldwin County Maintenance Facility Aboveground Storage Tank Details

Magnolia Landfill
15140 County Road 49
Summerdale, Baldwin County, AL

Spill Release Form

APPENDIX B

SPCC
Emergency Discharge/Spill Reporting Information
Form

Date: _____

Reported By: _____

Time: _____

Reported To: _____

EXACT ADDRESS OF FACILITY

ADDRESS _____

Telephone # _____

Exact Location of Discharge/Spill at Facility:

Type of Material Discharged/Spilled:

Source of Discharge/Spill:

Cause of Discharge/Spill:

Description of Affected Area:

Emergency Corrective Actions in Use at Present Time:

Are INJURIES caused by Discharge/Spill? _____

If So, How Many? Has EMS been dispatched to facility?

AT PRESENT, Do you foresee Evacuation of the facility or surrounding area?

Names of Individuals and/or Organizations that have been contacted concerning the emergency situation:

Additional Information That Would Assist Responding Agencies:

Certification for the Applicability of the Substantial Harm Criteria Checklist



APPENDIX C

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Magnolia Landfill

FACILITY ADDRESS: 15140 County Road 49, Summerdale, Alabama 36580

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-III, Appendix C, 40 CFR 112 or a comparable formula¹) 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 1, 11, and III 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 formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
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 than 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.

Name _____
Please print

Signature _____

Date _____

Facility and Tank Inspection Checklist



APPENDIX D

BMP Bi-Weekly Facility Inspection Report

General Information			
Facility Name	Magnolia Landfill		
NPDES Permit No.	AL0069345		
Date of Inspection		Start/End Time	
Inspector's Name(s)			
Inspector's Title(s)			
Weather Information			
Weather at time of this inspection? ☐ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snow ☐ High Winds ☐ Other: _____ Temperature: _____			
Have any previously unidentified discharges of pollutants occurred since the last inspection? ☐ Yes ☐ No If yes, describe: _____			
Are there any discharges occurring at the time of inspection? ☐ Yes ☐ No If yes, describe: _____			

Areas of Industrial Materials or Activities exposed to storm water

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
2	Equipment operations and maintenance areas	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
3	Fueling areas	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
4	Outdoor vehicle and equipment washing areas	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
5	Waste handling and disposal areas	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
6	Erodible areas/construction	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
7	Non-stormwater discharges	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
8	Dust generation and vehicle tracking	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
9	(Other)	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
10	(Other)	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	
11	(Other)	☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

CERTIFICATION STATEMENT

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Print name and title: _____

Signature: _____ Date: _____

MONTHLY FACILITY AND TANK INSPECTION CHECKLIST

DATE: _____ TIME: _____ INSPECTOR: _____	X = Satisfactory NA = Not Applicable O = None C = See Comment
--	--

Monthly Facility and Tank Inspection Checklist

Task Instructions: ****INITIAL EACH ITEM ON THE LINE PRECEDING INSTRUCTION AFTER IT'S PERFORMED****

1. AST's	YES	NO	EXPLANATION, IF NECESSARY
A. Tank surfaces checked for signs of leakage.			
B. General appearance of paint on shell and structural members:			
C. Tank condition good (no rusting, corrosion, pitting)			
D. Bolts, rivets, or seams are not damaged.			
Tank Foundation intact.			
E. Valves, flanges, and gaskets are free from leaks.			
Are all pieces tight?			
Are any pieces missing or require repairs?			
Are all insulating flange washers and sleeves in place?			
F. Are all ground and/or anode straps in place?			
G. Hoses and Piping			
General appearance of hoses.			
Any leaks? If so, explain.			
Piping free of leaks?			
H. No visible oil sheen in containment area.			
I. Level gauges and alarms working properly.			
J. Vents are not obstructed.			
K. Water/product in tank interstice (Double-wall tanks)			
2. CONTAINMENT AREAS			
A. No standing water in containment area.			
B. Containment walls are intact.			
C. Warning signs posted?			
D. Free of trash?			
E. Not used for storage?			
F. Free of excessive water?			
2. DRAINAGE			
A. Any noticeable oil sheen on runoff.			
B. Containment area drainage valves are closed and locked.			
3. SPILL RESPONSE EQUIPMENT			
A. Are designated storage areas adequately stocked.			
4. SECURITY			
A. Fence and gates intact.			
B. Gates have locks.			
C. AST's locked when not in use.			
D. Starter controls for pumps locked when not in use.			
E. Lighting is working properly.			

REMARKS/RECOMMENDATIONS:

Secondary Containment Calculations



APPENDIX E

Magnolia Landfill
Summerdale, Baldwin County, Alabama
Containment Area Calculations

Recommended Available Volume Calculations for Dike Containment Areas

1) Containment Area for Bulk Storage AST's (3 - 200 gal ASTs and 1 - 325 gal tote)

Containment Area Dimensions (Total Capacity)				
	Area (ft ²)	Avg. Depth (ft)	Volume (ft ³)	Volume (gal)
Bulk Storage Tank Area	301.58	2.67	804.23	6015.20
Available Containment			804.23	6015.20

Bulk Storage Tank Containment Area Available Capacity				
Structures within Containment	Capacity (gal)	Number	Volume (ft ³)	Volume (gal)
325 Gallon Tote	325.00	1	43.46	325.00
200 Gallon ASTs	200.00	2	53.48	400.00
5 Gallon Containers	5.00	75	50.14	375.00
			147.08	1100.00

Total Volume of Containment Area	804.23
Minus Volume of Structures Inside Containment Area	147.08
Total Available Volume (ft ³)	657.2
Total Available Volume (Gallons)	4,915
Largest Storage Tank Capacity in Service	200
Available Capacity Percentage	2457.57%

Notes:

1. Tank volume calculations are based on dimension measurements made in the field.

NPDES Storm Water Permit



APPENDIX F

SPCC Related Training Documentation Log



APPENDIX G

SPCC Related Training Documentation Log

Note: New employees shall receive initial training in the contents and implementation of this SPCC plan upon start of their employment. All employees shall receive annual refresher training in the contents and implementation of this SPCC plan.

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