



Storm Water Pollution Prevention Plan for:

Chelsea Sandwich LLC
Chelsea Terminal
11 Broadway
Chelsea, MA 02150

SWPPP Contact(s):

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Chelsea, MA 02150
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- B SWPPP Daily Inspection Form
- C. SWPPP Quarterly Inspection Form
- D. Corrective Action Form
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**GLOBAL COMPANIES LLC
CHELSEA TERMINAL**

**SWPPP - Reviews and Modifications
Log**

Revision Date	Page/Section Revised	Summary of Modification(s)	Approved by Signature
October 2015	Various	Updates to stormwater discharge procedures	
February 2017	Various	Various Editorial Updates	
January 2018	Various	Terminal Manager Change Various Editorial Updates	
February 2019	Various	Various Editorial Updates	
February 2020	Various	Various Editorial Updates	
February 2021	Various	Various Editorial Updates	

INTRODUCTION

The goal of Chelsea Terminal SWPPP is:

A. Enhance Water Quality by Implementing Control Measures.

- a) To identify industrial activities contributing to the releases of pollutants to the environment
- b) Reduce and/or prevent the discharge of pollutants into the storm water collection and conveying system
- c) Develop and implement best management practices (BMPs)
- d) Encourage employees to participate in development of SWPPP through periodic training and group meetings
- e) Develop adequate facility inspection procedures

B. Evaluating Effectiveness of the Control Measures.

It is recommended that the SWPPP be reviewed annually and must be evaluated whenever:

- a) control and treatment measures in place fail to meet the requirements of the numeric effluent limits stated in the NPDES permit
- b) an unauthorized release or discharge occurs at the terminal
- c) EPA/MassDEP determines that control measures are not stringent enough to meet the effluent limits stated in the NPDES permit
- d) SWPPP team determines that the control measures are not being properly operated and maintained.

C. To Comply with the Permit

This SWPPP is prepared to satisfy requirements of the EPA/MassDEP NPDES permit No. MA0003280 Part C.

D. To Satisfy Sector Specific Requirements for Industrial Activity

Parts C, b, vi and C. c. xi of the current permit includes provisions of the following sectors when addressing on site BMPs:

Sector P - Land Transportation and Warehousing
Sector AD – Storm water Discharges Designated by the Director as Requiring Permits.

SECTION 1: FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility:

Name of Facility: Chelsea Terminal
Street: 11 Broadway
City: Chelsea
County: Suffolk
State: Massachusetts - 02150

Applicable SIC Codes

Primary SIC Code: 5171 (Petroleum Bulk Stations and Terminals)
Secondary SIC Code: 4491 (Marine Cargo Handling)

LOCATION: (Latitude/Longitude)

Latitude: 42° 23 '10" N
Longitude: 71° 02' 43" W
(Method for determining latitude/longitude: USGS topographic map (scale: 1" = 1500')

PERMIT

Permit Tracking Number: EPA NPDES – MA 0003280

Discharge Information:

Estimated area of industrial activity at the terminal exposed to storm water is **approximately 10 acres.**

Chelsea River receives storm water discharge from the terminal.

The terminal discharges directly into a segment of Boston Harbor at the confluence of the Mystic and Chelsea Rivers. This segment is identified as **Segment MA71-06 of Chelsea River** by the MassDEP and, Mass WPC has designated the segment as “impaired” water.

NOTE: MassDEP Division of Watershed Management classified this segment as impaired and identifies pollutants and conditions requiring a Total Maximum Daily Load (TMDL) are ammonia (unionized), fecal coliform, dissolved oxygen, PCB's in fish tissue, petroleum hydrocarbons, and sediment. Taste, odor and turbidity also are listed. The storm water discharges are subject to effluent guidelines as noted in the Effluent Limitation and Monitoring Requirements of the NPDES Permit No MA 0003280; PART I, A. The permit was issued on September 25, 2014.

OTHER RELATED INFORMATION:

The terminal discharge is not subject to MS4 requirements

Chelsea River is not designated Tier 2 or Tier 2.5 water.

The terminal is not located in Tribal Lands.

The terminal is not a Federal Facility.

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Global Companies LLC
Address: 11 Broadway
City, Chelsea, MA 02150
Telephone: 617 660 1100
Email address: tkeefe@globalp.com

Facility Owner (s):

Name: Chelsea Sandwich LLC
Address: 800 South Street, PO Box 9161
City, Waltham, MA 02454-9161
Telephone Number: 781 894 8800
Fax number: 781 398 9212
Email address: tkeefe@globalp.com

SWPPP Contact:

Name: Tom Keefe, Vice President EHS
Telephone number: 781 398 4132
Fax number: 781 398 9212
Email address: tkeefe@globalp.com

1.3 Storm Water Pollution Prevention Team

The SWPPP team includes Global Employees who are familiar with the various components of the facility including the processes, fuel handling and the transfer of petroleum products. The Team is responsible for familiarizing each of the employees with a) the requirements of the terminal NPDES permit, b) that they receive training in spill/leak reporting, clean up and waste handling and disposal, c) that they participate in 'mock drills' and development of this SWPPP. The team leader (Terminal Manager) is responsible for recordkeeping and reporting and is designated on site incident commander. Global also seeks assistance from independent

environmental contractors to enhance its storm water collection and management practices.

The SWPPP team duties include the following:

- Implement the SWPP Plan
- Implement and oversee employee training
- Conduct and/or provide for inspections and SW monitoring activities
- Oversee maintenance practices identified as BMPs
- Identify other potential pollutant sources previously not known and incorporate them in this SWPPP
- Identify any deficiencies in the current SWPPP.
- Ensure that any on site physical or operational changes are documented in the SWPPP.

Table 1: SWPPP Team

SWPPP Team	Responsibilities
Tom Keefe, VP EHS	SWPPP Compliance Officer - Reporting and Training
Don Janik, Terminal Manager	Team Leader - On Site Compliance and Routine Inspections
Emin Bakiu, Assistant Manager	Assists with On Site Compliance and Routine Inspections
Eric Davis, Project Manager	Project Coordinator – Maintenance and Projects
David Slater, Lead MTO	Daily inspections and maintenance activities
Environmental Consultant(s)	Sample collections and data analysis

1.4 Activities at the Facility

The terminal is located on an approximately ten (10) acre site in Chelsea, Massachusetts along the northern bank of the Chelsea River. Its physical address is 11 Broadway and is located between the Chelsea River, Broadway and Front Street.

The terminal receives, stores and distributes petroleum products (distillates) including fuel additives (e.g. red dye). It also has the capability of physically blending some of the distillates to distribute additional products having similar chemical and physical properties. (e.g. various grade of bio-fuels as well as heating oil)

The terminal receives bulk quantities of petroleum products via ship or barge at the Terminal marine vessel dock and via tanker truck. The products from marine vessels are transferred via an above ground piping network to above ground storage tanks (ASTs) located within the terminal tank farm areas. Final distribution of product is conducted primarily at the Terminal truck loading rack. Some product distribution also occurs at the marine vessel dock to ships, barges or via fuel station located at the marine vessel dock.

The treated storm water is discharged into the Chelsea River near the vicinity of confluence of the Mystic and Chelsea Rivers. Outfall 001 is located at Latitude 42° 23' 7.4898" N Longitude and 71 ° 02' 40.844" W. An internal outfall 002 is located at Latitude 42 ° 23' 8.9154"

N and 71 ° 02' 42.681" W. These outfalls are subject to NPDES permit discharge and monitoring limitations.

The NPDES permitted discharge to the Chelsea River via Outfall 001 consists of:

- 1) treated storm water runoff
- 2) treated ground water from an on-site remediation system (Outfall 002)
- 3) small amounts of boiler blow down
- 4) discharge of hydrostatic test water.

EPA has established specific discharge limits for the hydrostatic test water that are independent of the effluent limitations noted in PART IA of the current NPDES permit.

1.5 General Location and Site Maps

Copies of the general location and site map for the Chelsea Terminal are included in Attachment A-1 and A-2.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

The industrial activities include discharges of storm water and non-storm water. Potential pollutants associated with these discharges are listed in Table 2. Storm water and non-storm water discharges from the facility are regulated by EPA NPDES permit MA0003280, issued on 09/24/2014, effective 12/01/2014.

In addition, the facility is permitted to discharge non-contact storm water. Non-contact storm water is classified as water collected in areas throughout the facility where there is little or no potential for precipitation and storm water to encounter potential pollutants. Examples of such areas are paved parking areas, paved facility access ways and run off from roofs and canopies. At Chelsea Terminal non-contact storm water is collected by the facility storm water collection system and discharged via outfall 001. Exceptions include areas along the perimeter of the property where non-contact storm water sheet flows off the property.

2.1.1 Storm Water

Storm water is collected at the terminal in the following areas:

- 1) marine vessel dock
- 2) terminal yard (individual diked tank)
- 3) terminal field (concrete dike with common containment)

Storm water runoff from each of these areas is visually inspected, drained separately into the storm water collection system and processed through the oil water separator (OWS) prior to discharging to the Chelsea River via Outfall 001. The OWS is installed with coalescing packs which enhance treatment of the storm water being discharged.

Storm water collected inside the secondary containment areas is visually inspected for product or oil sheen before it is released from the containment to the storm water catch basins located in the terminal yard. If product or oil sheen is visually detected, the storm water is not released to the storm water collection and conveyance system. It is instead either treated on site or disposed of offsite.

The marine vessel dock is equipped with a drip pan that collects any fuel leaked from overhead fuel transfer hose(s). Contents of the drip pan are returned to storage or disposed of when deemed necessary in accordance with applicable regulations. The drip pan is inspected after each transfer for any leaks and any accumulated contents. The area of the dock where bulk transfers are conducted is contained within a concrete berm. This water is collected and transferred to the tank field secondary containment area and subsequently processed through the oil water separator and discharged via Outfall 001.

The tank farm area of the terminal yard is located within secondary containment, constructed of steel or concrete walls supported by concrete foundations. Storm water collection sumps are

located within the secondary containment of three of the five ASTs (#201, #202 and #205) in the tank farm. Accumulated storm water within these containment areas is either transferred to a concrete dike containment area or discharged directly into adjacent storm water catch basins. Four additional tanks in the terminal yard are constructed with individual concrete containment structures. Each is equipped with a floor drain plug or control valve that are manually operated to gravity drain into the storm water collection and treatment system. All the dikes are frequently inspected for potential spills or fuel leaks along with prior to discharging via manually controlled discharge valves.

Storm water collected on the parking lot and paved areas of the terminal yard (approximately four acres) collects in nearby catch basins. Storm water, if necessary, can be stored in this area by closing an independent gate valve leading to the OWS or by not pumping storm water from the catch basin/ holding tank system located in the northeast corner of the rear paved area.

Two of the seven truck pump-off stations in the terminal yard are equipped with a concrete containment structure designed to collect minor leaks that may occur during fuel transfer. Storm water collected in the concrete containment structure of one of these stations is confined inside the secondary containment and has no drainage provisions. The second station has secondary containment with a drain valve that discharges into the storm water collection system. The remaining stations are associated with individual tanks and are rarely used.

Storm water runoff from the paved truck loading rack area (approximately 0.5 acre) flows to a perimeter drain that encompasses approximately two-thirds of the loading area. A canopy roof covering the truck loading rack directs precipitation away from loading equipment towards and into the perimeter drains. Storm water runoff that is not captured by the perimeter drain travels toward lower elevation catch basins located near the loading area. The storm water runoff collected by the perimeter drain enters the storm water collection system via a man-way located near the entrance of the foam house. This man-way also acts as an isolation point for the perimeter drains. The storm water collection system carries the runoff by gravity to the OWS prior to discharging into the Chelsea River via Outfall 001.

The terminal field located on the west side of the Terminal property encompasses approximately 2 acres. Storm water runoff within the terminal field is directed overland towards a shallow lift station located between Tanks 104 and 105. The lift station has a float control activated pump which is manually operated. The control switch for the pump is always maintained in the off position except to discharge accumulated storm water. The water collected inside the lift station sump is visually inspected prior to operating the pump. Storm water from the lift station is pumped over the secondary containment wall into the underground storm water collection system via a catch basin located outside the terminal field near the boiler house. Storm water entering the collection system from the terminal field then flows by gravity to the OWS and discharges into the Chelsea River via Outfall 001.

2.1.2 Groundwater Remediation Effluent

A groundwater treatment system was installed in November 2003 and is operated to recover fuel oil from a historical spill regulated under the Massachusetts Contingency Plan (MCP) (310 CMR 40.0000). The groundwater system consists of nine recovery wells installed within and adjacent to the terminal field tank farm: three in the terminal yard and six inside the terminal field. Recovery wells located in the terminal yard are inactive. Of the six recovery wells installed inside the terminal field, four are currently in use. The average flow rate generated by the four recovery wells is 7 to 8 gallons per minute (GPM). However, the treatment system has the potential to treat a maximum design flow capacity of 25 GPM.

Groundwater is pumped from the recovery wells to a treatment system consisting of an OWS, a cartridge filter bag, and two 1,000-pound granulated activated carbon (GAC) units in series. Treated groundwater is discharged via Outfall 002 into the lift station sump located in the terminal field. The sump also collects storm water runoff accumulated inside the terminal field. Treated groundwater and any storm water in the lift station is pumped to the Terminal's OWS prior to discharge to the Chelsea River via Outfall 001.

Note: Internal Outfall 002 was established upstream of the storm water treatment system and Outfall 001 to ensure that monitoring results reflect the true characteristics of the remediation discharge stream.

2.1.3 Boiler Blow-down Water

Chelsea Terminal operates two gas/oil fired boilers to generate steam used to heat several buildings located at the Terminal. Steam is also used to heat No.6 fuel oil to lower the viscosity and to heat bio-fuels to prevent the product from solidifying. Typically, a small volume of water is withdrawn from the boilers daily as part of the required operation and maintenance. This discharge, or "boiler blow-down" is required to prevent the potential buildup of naturally occurring mineral salts inside the boiler's heat transfer tubes that can lead to corrosion.

Boiler blow-down discharges are intermittent and of short duration occurring in small volumes at high pressure. The discharge consists of water and steam or water that may contain metals or feed water corrosion inhibitors (i.e., bio-degradable water softeners) that are added to the boiler. The terminal discharges the boiler blow-down into the storm water collection system.

2.1.4 Hydrostatic Test Water

The aboveground storage tanks are subject to external inspections (502 CMR 5.00) and their integrity is certified annually by a licensed tank inspector. Internal inspections of the above ground storage tanks are conducted in accordance with the inspection and repair procedures under the API 653 Standard (commonly conducted at 10-year intervals). After completing certain maintenance work, the tanks and/or pipe networks may be hydrostatically tested for leaks.

Hydrostatic testing involves filling the vessel or pipe with water to determine if the vessel is leak free and to test the integrity of the repair work. River water or potable water may be used as a source of hydrostatic test water. Following completion of the hydrostatic testing, the test water is discharged in accordance with the permit.

The hydrostatic test water discharge may contain minimal amounts of foreign matter, trace amounts of hydrocarbons, background material found in the river, or residual chlorine.

Chelsea Terminal utilizes municipal water supply for testing. The hydrostatic test water effluent discharge limitations are discussed in detail in the current NPDES permit Part 1A. 16.

2.1.5 Summary of Pollutant Sources

Chelsea Terminal is a petroleum bulk storage and distribution terminal. The petroleum products stored are classified as distillates (diesel, fuel # 2 and # 6) and bio-fuels. In addition, fuel additives in small quantities are stored at the site (e.g. red dye and heating oil plus). Bio degradable water softeners (55 gal drums) are also stored in the boiler room. The parts cleaner liquids used on site are nonhazardous and biodegradable. Chemicals are not used in treatment of ground water. Other industrial activities conducted on site are hazardous waste storage, vehicle maintenance and indoor vehicle/equipment washing. All these activities are indoors and confined. Therefore, there is no potential of pollutants discharge into the environment.

The following is the summary of pollutants associated with the on-site industrial activities:

Table 2: Industrial Activity Associated Pollutants

Industrial Activity	Associated Pollutants
Distillate Storage – heating oil	Oil and Grease, PAHs, TPH
Distillate Storage – Diesel fuel	BTEX, Oil and Grease, PAHs, TPH
Distillate Storage – Bio fuel	Oil and Grease, PAHs, TPH
Residual Oil Storage	Oil and Grease, PAHs, TPH
Loading and Unloading – Marine Vessels	BTEX, Oil and Grease, PAHs, TPH, TSS
Loading and Unloading – Tanker Trucks	BTEX, Oil and Grease, PAHs, TPH, TSS
Pipe line network – product transfer	BTEX, Oil and Grease, PAHs, TPH
Pump Stations – collection sumps	BTEX, Oil and Grease, PAHs, TPH
Ground water remedial system	BTEX, Oil and Grease, PAHs, TPH
Utility Boilers – Boiler Blowdown	Fe, TSS,
Parking Lots and Roadways – vehicular	TSS
AST-Hydrostatic Test Water – potable water	O&G, PAHs, TPH, Fe, TSS, Chlorine
Secondary Containment – limited to contact	TSS, O&G, PAHs, TPH

2.2 Spills and Leaks

In accordance with 40 CFR 112, a facility must prepare a Spill Prevention and Control and Countermeasures (SPCC) plan whenever the following conditions are met:

1. The facility is non- transportation related
2. The aggregate above ground storage capacity is greater than 1,320 gallons (which includes containers 55 gallons or greater)
3. The total underground storage capacity is greater than 42,000 gallons counting only completely buried tanks and tanks not subject to UST technical standards in 527 CMR 9.05
4. Due to its location, oil spilled at the facility could reasonably be expected to reach navigable waters of the United States or adjoining shorelines

2.2.1 SPCC Plan

The Chelsea Terminal is subject to 1, 2 and 4 requirements. There are no underground storage tanks located on site. The SPCC Plan prepared by the facility in compliance with the 40CFR112 addresses spills/leaks management, response procedures as well as clean up of accidental spill/leaks.

2.2.2 Areas of Site Where Potential Spills/Leaks Could Occur

Table 3: Potential Spills/Leaks and Affected Outfall

Potential Locations	Outfalls that may be affected
Terminal yard secondary containment	Outfall 001
Terminal field secondary containment	Outfall 001 and Outfall 002
Storm water run-off from facility paved areas	Outfall 001
Fuel loading and unloading areas	Outfall 001
Pipe line net work	Outfall 001 and/or Outfall 002

2.2.3 Description of Past Spills/Leaks:

A detailed list of spills and leaks is maintained by the Global EHS Department.

2.3 Non-Storm Water Discharges Documentation

(A) ALLOWABLE DISCHARGES

2.3.1 Groundwater Remediation Effluent

The groundwater Remediation System was designed and installed by Tighe and Bond. The system was tested for its performance and effluent was characterized during the system start up. Based on the effluent characterization, EPA established effluent discharge limits in the NPDES permit issued on 06/30/2005. Since 06/30/2005, the effluent is quarterly tested for TPH, O&G, pH, BETX and PAHs. The system maximum design flow rate is 25 gpm. The current NPDES permit allows discharge of the groundwater remediation effluent. The discharge point is designated as Outfall # 002. The system is operated and maintained in compliance with the applicable laws and regulations.

2.3.2 Boiler Blow-Down Water

The blow-down boiler water was characterized by Triton Environmental, Inc in June of 1998. Most recently, EPA and Chelsea Terminal reassessed impacts of the boiler blow down on the receiving water body. Given the minuscule volume of discharge when compared to the actual flow from OWS, no changes were deemed necessary to the previously approved boiler blow down discharges. The boiler blow-down discharges into the 'man-way' located near the Boiler House and flows into the storm water collection system. The current NPDES permit allows discharge of the boiler blow down via Outfall 001.

2.3.3 Hydrostatic Test Water

Based on the available data, during the previous permit cycle the Chelsea Terminal discharged hydrostatic test water two times. The discharges were characterized, and the results were filed with the EPA. In addition, during the previous permit renewal application period, EPA with assistance from the Petroleum Terminals and its own resources characterized Hydrostatic Test Water and developed discharge criteria and effluent limitations for hydrostatic test water. Chelsea Terminal uses municipal water to conduct Hydrostatic Testing. Thus, eliminating discharge of any contaminant found in the river water. The current NPDES permit allows discharge of Hydrostatic Test Water via Outfall 001.

2.3.4 Additional Allowable Discharges

The current NPDES permit authorizes Chelsea Terminal to discharge treated storm water and groundwater in accordance with the terms and conditions detailed in the permit via approved Outfalls #001 and #002. In the event of any accidental discharge(s) of wastewater from any other point sources which are not authorized by EPA and/or MassDEP shall be reported (within twenty-four hour) in accordance with the Standard Conditions of the current permit. In addition, Chelsea Terminal is authorized for the following discharges provided these discharges meet all effluent limitations as outlined in the current permit:

- Discharges from fire-fighting activities
- Fire hydrant flushing
- Potable water (e.g., water line flushing) unless associated with hydrostatic testing
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids
- Irrigation drainage
- Landscape watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred or could occur
- Routine external building wash-down that does not use detergents
- Uncontaminated groundwater
- Foundation or footing drains where flows are not contaminated with process material
- Incidental windblown mist from boilers and/or cooling towers that collects on rooftops or adjacent portions of the Terminal, but not intentional discharges from these structures (e.g., blow down or drains)

(B) PROHIBITED DISCHARGES

2.3.5 Hazardous Waste Storage

Chelsea Terminal stores hazardous wastes in a closed sea container having a built-in secondary containment. No storm water is exposed to the hazardous waste storage area. Any discharge from a hazardous waste storage area is prohibited by EPA.

2.3.6 Truck Wash Bay

Chelsea Terminal operates an indoor wash bay at the facility. Occasional washing of vehicles and equipment occurs within the bay. The wash waters are collected in a sump located in side the wash bay and discharged into the City's MWRA oil water separator located directly in front of this bay. The current NPDES permit prohibits discharge of any water from this bay. Water is pumped into a small holding tank and then to the MWRA oil water separator.

2.3.7 Vehicle Fueling Areas

There are no vehicle fueling areas located on the site.

2.3.8 Tenant Maintenance Garage

A vehicle maintenance garage is located on site and is operated by Chelsea Terminal's tenant, Alliance Express (HOP). Vehicle maintenance is conducted indoors and potential drips/spills in the garage are cleaned up. The floor drains in their garage have been sealed. There is a MWRA oil water separator directly in front of this garage. Alliance Express (HOP) has their

own SPCC Plan since our Terminal SWPPP Team does not monitor this garage. The current NPDES permit prohibits any discharge from the Maintenance Garage which is why the floor drains have been sealed.

2.3.9 Tank Bottom Water

On occasions the terminal draws small quantities of tank bottom water. The tank water bottom is stored on site in a dedicated AST and when full, its contents are hauled and disposed off site by a licensed contractor. The current NPDES permit prohibits any discharge of tank water bottom.

2.3.10 Additional Prohibited Discharges

- Tank bottom water and/or bilge water alone or in combination with storm water discharge or wastewater.
- Any sludge and/or bottom deposits from any storage tank(s), basin(s), and/or containment area(s) to the receiving water. Examples of storage tanks and/or basins include, but are not limited to: primary catch basins, oil/water separators, petroleum product storage tanks, baffled storage tanks collecting spills, and tank truck loading rack sumps.
- Wastewater from truck washing activities.
- Untreated storm water runoff from the marine vessel dock.
- Discharge of additives, including, but not limited to: glutaraldehyde, ethylene glycol, butoxyethanol, alkylacrylate nitrite styrene polymer, coco alkylamine, 1,2,3 and 4- trimethylbenzene, 1,3,5-trimethylbenzene and methyl isobutyl ketone.
- Any effluent containing fire protection foam, either in concentrate form or as foam diluted with water.
- The bypass of the storm water treatment system is prohibited except where necessary to avoid loss of life, personal injury, or severe property damage. Each bypass shall be sampled for all the effluent characteristics and the results reported to EPA within 45 days of the initiation of the bypass.

2.4 Salt Storage

Salt is not stored in piles on the site.

2.5 Sampling Data Summary

Sampling data is maintained (including any exceedance information) at the terminal.

SECTION 3: STORMWATER CONTROL MEASURES

Storm water control measures can either be structural or non-structural. Examples of structural measures are collection and treatment systems, secondary containment structures and secured chemical storage areas. Examples of non-structural measures are employee awareness, facility inspections, house keeping and development BMPs.

3.1 Minimize Exposure

Chelsea Terminal (over the years of operation) has implemented several structural and non-structural measures to prevent exposure of storm water to its industrial activities, namely:

- Construction of secondary tank containment areas.
- Isolation of chemical supplies (containers 55 gal or smaller) by placing them inside enclosed roofed areas having no floor drains.
- All the vehicles maintenance is conducted inside a garage and parked trucks are inspected periodically for oil drips or minor leaks.
- Isolation of hazardous waste storage areas by placing waste in sea-containers having built in spill containment.
- Any minor spills and/or leaks are cleaned promptly using dry methods (e.g. speedy dry or absorbents pads) In addition, employees/contactors are instructed to use drip pans and adsorbents pads when performing maintenance/repair activities.
- Solid waste is placed in dumpsters having no drains (*if necessary, drains are plugged*) and with covers to prevent rain water from entering or leaving them. Dumpsters are inspected periodically and emptied frequently.
- Salt is not stored in piles on site. Sand may be stored in a small pile for construction projects only. If so, the sand pile would be covered while not being used.
- Main truck fuel loading area has a roof canopy with a perimeter drain that goes to the storm water collection system. The entire truck loading area (the racks) are power washed during dry weather, if needed.
- The oil water separator is equipped with coalescer packs. These packs are cleaned as needed.
- All the parking areas and access road ways are paved. Any storm water collected in these areas is processed through the oil water separator and sampled.
- Catch basins associated with the storm water conveyance system are inspected annually by a SWPPP team member. If it is determined that the catch basins need to be cleaned, the contact water is disposed of at an off-site licensed facility.
- The oil water separator is inspected annually by SWPPP team member. Water samples are taken as required (usually after a storm event). Any sample from the oil

water separator that has issues may trigger the need for it to be cleaned.

- Chelsea Terminal conducts painting activities during the dry weather.

3.2 Good Housekeeping

Good housekeeping (aka Best Management Practices – BMPs) are used to maintain a clean and orderly work place to reduce the potential for accidental spills or releases of materials that could contaminate storm water. Vehicles are parked on paved surfaces within the Terminal Yard. The truck loading rack is constructed with a canopy roof. The canopy roof prevents most precipitation from contacting the product loading area distribution equipment. The rack is also equipped with overflow protection devices and other equipment to prevent discharges. The area is kept clear of vehicle hazards, and overhead clearance is adequate for all tank truck vehicles. The fuel loading areas (the rack) are kept clear of unnecessary equipment and debris. Small spills due to normal loading/unloading operations are immediately cleaned up using any combination of absorbent pads and speedy-dry. The floor of the loading areas is cemented and impervious. The loading areas are inspected daily to ensure that the areas are kept clean and orderly.

3.3 Maintenance (Preventative)

Chelsea follows a preventative maintenance program that is designed to avoid potential spills and impacts to storm water runoff. The age and condition of all equipment is considered in the preventative maintenance program. Routine maintenance is conducted to repair and/or replace Facility equipment which is subject to normal wear and tear or is utilized regularly to handle a high volume of product. Routine maintenance has been shown to effectively reduce equipment failure. Facility equipment is typically well maintained and kept in a good operating condition. The facility's inspection/maintenance program is designed to minimize the risk of a release due to age, wear and/or failure. Equipment, such as pumps, valves and flanges, are visually inspected daily. Operations personnel are responsible for logging daily inspections at key stations. Chelsea Terminal also maintains a tank and pipeline integrity testing program as described in the Facility SPCC Plan.

Maintenance of the integrity and effectiveness of secondary containment structures, drainage and flow planning and strategic placement of spill equipment, are few of the measures used to reduce the potential for an oil spill to spread beyond the property boundaries. The location of emergency and fire protection equipment is shown on the Terminal Plot Plan. Protective equipment, such as uniforms, rubber and cloth gloves and First Aid kits are also available at the Terminal Office. All equipment is inspected for repair and maintained in good operating condition and readily available for use.

Chelsea Terminal conducts the following specific preventative maintenance tasks:

- Catch basins throughout the facility are inspected annually and cleaned as necessary
- The oil/water separator is inspected regularly and sampled to determine if cleaning is necessary.

- Paved areas of the facility are swept at twice per year or as needed
- Loading bays are broom swept frequently
- Dumpsters at the facility are always covered with bottom drains plugged
- Groundwater remedial system is monitored weekly
- Equipment maintenance is performed weekly by a qualified person

In addition, Chelsea Terminal minimizes any adverse impacts during painting operations by performing the following activities:

- Painting guidance is provided to ensure training as identified in the storm water training section
- Minimizing the use of spray painting to reduce entrainment of paint into the air
- Storing paint containers inside and closed when not in use
- Schedule painting to allow enough time to dry before next expected rainfall event
- Good housekeeping measures to minimize the amount of residual paint exposed to storm water by using drop cloths or other barriers, as feasible.

3.4 Spill Prevention and Response

Chelsea Terminal has developed a detailed SPCC Plan and Facility Response Plan. The Plans are on file at the terminal.

The Spill Management Team comprised of employees accountable for oil spill prevention and cleanup. The facility ensures adequate spill prevention and response through a rigorous program including maintenance, training, structural and design controls and inspection procedures. The facility employs a preventative maintenance program to mitigate potential spills related to faulty material and equipment, including daily inspections of piping, valves, pumps, flanges, etc. and conducting internal and external tank integrity testing. In addition, comprehensive monthly inspections are conducted to ensure that critical equipment, structures and response equipment are in good repair and/or available for use in the case of an emergency.

All employees involved in oil transfer or other handling activities receive on the job training and OSHA HAZWOPER training. The facility also conducts mock drills and exercises. The facility has been designed to prevent a release of oil to the environment through generally accepted engineering practices, regulatory requirements, or nationally recognized code standards.

The facility has also employed standard procedures to prevent a spill during transfer operations. Procedures and/or high-level alarms are used to prevent spills during oil transfers and all transfers are monitored by terminal operators. Equipment to be used in a material transfer is visually examined immediately prior to starting the operation. The facility has also established a set of requirements which drivers must comply with to use the loading rack. The Terminal Manager and other facility employees are trained to assist and respond to any problems a driver may encounter.

Note: The facility agrees to report the appearance of any size sheen on a navigable waterway

attributable to the discharge from the terminal to National Response Center in accordance with Section 311 of the Clean Water Act.

3.5 Erosion and Sediment Controls

The terminal has taken extra measures to prevent on site erosion. Parking lots and areas accessible to vehicle traffic are paved. The terminal yard and the terminal field are either paved or lined with stone. All the paved areas are swept twice a year to prevent sediment accumulating on site. The truck loading bays are broom swept frequently. No salt in piles is stored on site. The storm water collection catch basins are inspected and cleaned as necessary once a year during the dry weather and sediment are disposed off site by licensed contractor. To prevent shoreline erosion, stone rip rap is utilized in areas.

3.6 Management of Runoff

Chelsea Terminal has implemented following steps to manage the storm water runoff.

Off-Site Runoff Control

The terminal is located along the northern bank of the Chelsea River and between the Chelsea River, Broadway and Front Street. Approximately one half of the terminal's perimeter is surrounded by rip rap or steel bulkhead to prevent erosion to the bank and the other half of the perimeter adjoins paved city street. The streets surface is at a lower elevation when compared to the terminal perimeter. All the runoff from the streets is directed towards catch basins connected to the city's storm drainage system. Thus, potential for the off-site runoff co-mingling with the onsite runoff is very unlikely. The loading rack which is located several feet away from Broadway is installed with an independent perimeter drain connected to the terminal storm water collection system. Thus, potential for the non-contact water co-mingling with the off-site storm water is also unlikely.

On-Site Runoff Control

The terminal perimeter pitches inwards and is designed to retain water runoff within the site.

The entire site pitches towards the river and thus, potential for on site runoff entering city's storm drain is very unlikely. ASTs' secondary containment areas isolate on site run off in segments and present additional control measures. On site runoff is directed to the terminal storm water collection net work and is treated prior to discharge via outfall 001.

3.7 Salt Storage Piles or Piles Containing Salt

There are no piles of salt stored on the site. Small quantities of salt and sand are stored in bags on site for safety and/or emergency use. A sand pile may be on site for a construction project if necessary and will be covered when not in use.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

The terminal is ineligible for EPA's 2008 Multi-Sector General Permit (MSGP) for Storm water associated with industrial activity because discharges from the terminal are covered under an individual industrial permit issued by EPA before February 4, 1987. A copy of EPA NPDES current permit is attached to this plan (Attachment G).

3.9 Employee Training

Training may be on the job, lecture, computer-based or a combination thereof. Training records are kept of file including a written exam and/or demonstration to verify that employees show knowledge in the topics learned.

3.9.1 General Personnel Training

General Facility Orientation Training is provided to all newly hired personnel whose job description includes, but is not limited to, oil handling operations or hazardous waste management activities. The purpose of the training is to provide knowledge of day-to-day operations and basic emergency response procedures.

3.9.2 SWPPP and Related Training

Training on storm water pollution prevention practices is conducted annually and includes:

- Stormwater Pollution Prevention Team
- Best Management Practices
- Stormwater Discharge Procedures
- Pollution Sources

In addition, the facility personnel are provided with spill response training (OSHA HAZWOPER and on-site drills/exercises) and are reminded that care and good judgment are the best means of preventing an emergency. Facility personnel are instructed to:

- Exercise care in the delivery of all products
- Never leave a fuel transfer operation unattended
- Keep a close watch on storage tank levels and product pipelines while conducting transfer operations
- Perform preventative maintenance on fuel handling equipment

3.9.3 Training Records

Training records may be maintained electronically, through a Learning Management System (LMS) or in hard copy at the facility. The entity / system performing the training will validate that the training is complete either by electronic certification or signature by the instructor.

3.10 Non-Storm Water Discharges

The terminal has developed internal procedures to manage permitted non-storm water discharges including boiler blow down. Other non-storm waters classified as non-permitted and/or restricted are hauled off site for treatment and disposal by licensed contractors.

3.11 Waste, Garbage and Floatable Debris

Solid waste generated on site is collected in 55-gallon steel containers which are placed at various locations on the site including at the truck loading area. The waste from these containers is removed frequently by the terminal employees and transferred to larger waste accumulation containers which are emptied weekly and replaced by empty containers. All the containers are provided with rain covers and have no drains. The containers are inspected frequently as a good housekeeping measure.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

All the terminal access ways are paved to prevent soil erosion.

Parking lots are paved and maintained in good condition. Paved areas are swept twice a year by a road sweeper and collected sweepings are hauled off site for disposal. The tanker truck traffic is limited to the loading rack areas which are broom swept frequently by the terminal employees. There is an unpaved strip of parking area in front of the boiler house, which is graveled packed and only accessible to the maintenance crew. The facility has not experienced any airborne dust problems to date anywhere on site.

3.13 Site Specific Best Management Practices (BMPs)

3.13.1 Initiation of a Discharge

Prior to commencing a discharge, the Terminal Manager or a designee will confirm that:

1. Any spill/leak noted during the daily inspection was adequately cleaned and oily waste generated was properly handled (refer to FRP)
2. No visible sheen (as determined by the DEP criteria) is observed on the surface of the water accumulated in the OWS
3. Walk the discharge area (outfall 001) and confirm that no oily sheen exists near and around the discharge receiving water. (Chelsea River) and the discharge line is in good operating condition
4. Log the necessary flow meter readings and/or time of the discharge
5. Determine that the discharge will be free from the tidal influence

During and after a heavy rain fall the terminal has experienced onsite flooding and over flow of storm water collected in the catch basins. This is due to the lack of available storage capacity within the storm water collection system. On site flooding conditions can jeopardize the integrity of the above ground net work of fuel handling and fuel supply tanks/piping/equipment

as well as the safety of the employees managing and monitoring various field activities. Therefore, the terminal may be forced to discharge treated storm water run off to the river and may not adhere to all the Permit specific conditions noted in Footnotes 1, 2, and 3 of Part 1 A I and in Permit condition Part 1 C3a. However, based on the sampling location for the discharge, the sample will be free from tidal influence.

In addition, coordination of sample timing with other bulk petroleum storage facilities required under Part 1 C3e is not practicable due to differing aspects of the terminals which affect the timing of discharges. The terminal shall report immediately the appearance of any size sheen attributable to the discharge from the terminal to the U.S. Coast Guard Officer in accordance with Section 311 of the Clean Water Act.

3.13.2 Integrity Testing of Storm Water Collection System

In accordance with the permit, an assessment of the stormwater collection system was conducted within the timeframes required by the permit to identify and reduce infiltration inflow as feasible.

3.13.3 Evaluation of Alternate Storm Water Treatment Processes

During the previous permit cycle, Triton Environmental, Inc, evaluated several potential alternate treatment processes. Based on their recommendation, the terminal installed rows of coalescer packs inside the OWS. Installation of coalescer packs has increased the efficiency of storm water treatment.

3.13.4 Assessment of Site-Specific Factors

On site activities are conducted to meet or exceed requirements of
Sector P - Land Transportation and Warehousing
Sector AD – Storm Water Discharges Designated by the Director
(Refer to the attachment F)

3.13.5 Inspections

Refer to the SWPPP and attachments B and C - Quarterly Inspections

SECTION 4 SCHEDULES AND PROCEDURES FOR MONITORING

4.1 Summary of Monitoring Matrix

Sampling schedules and the monitoring procedures are well documented in the final NPDES permit (Attachment E).

4.2 Hydrostatic Test Water Sampling

The hydrostatic test water effluent discharge limitations are discussed in detail in the current NPDES permit Part 1A, 16 (Attachment E). The Chelsea Terminal typically utilizes potable water supply for hydrostatic testing.

SECTION 5 INSPECTIONS

The Facility Inspection Program includes a monthly Multi-Media Inspection which consists of routine visual inspection of the entire facility to identify conditions which exist that may cause or contribute to a product release, as well as to ensure that response resources are in place. The Terminal Manager or designee also conducts visual inspections of the entire facility daily (at a minimum). Tanks, piping and associated oil transfer equipment are inspected for evidence of leaks.

5.1 Daily Inspections

The objective of the daily walk through is to ensure that all equipment, systems and structures are in a satisfactory condition. At a minimum, the four (4) principal components of the Facility that should be considered in conducting the daily inspection include: (1) product storage and handling equipment; (2) containment and diversionary structures; (3) emergency response resources; and (4) hazardous waste storage areas. If it is determined that a piece of equipment, system, etc. is in unsatisfactory condition based on the daily inspection, the condition is noted, and corrective action is taken.

5.2 Monthly Inspections

The Monthly Inspection Log identifies the principal areas, systems and equipment that should be evaluated during the monthly inspection. These facility components include:

- Dock Areas
- Bulk Aboveground Storage Tanks
- Secondary Containment Structures
- Miscellaneous
- Truck Loading Racks
- Security
- Communication Equipment
- Spill Response Equipment
- Fire Protection System
- Product Transfer Piping
- Drainage System

Each of these items is evaluated based on the requirements of the principal components of this Plan (i.e., Spill Prevention Control and Countermeasures, Storm Water Management, Facility Response, etc.) as applicable. If it is determined that a piece of equipment, system, etc. is in unsatisfactory condition based on the monthly inspection, it is noted, and corrective action is taken.

5.3 Storm Water Quarterly Inspections

Chelsea Terminal conducts quarterly inspections of all the areas exposed to storm water and all structural control used to comply with effluent limits in the permit. Included in these quarterly inspections is a visual inspection of a storm water samples collected within the first 15 minutes of a discharge for water quality parameters specified in the permit. For details refer to Daily and Quarterly Inspection Forms – Attachments B and C.

5.4 Discharge Inspections

SPCC regulations and the Chelsea Terminal NPDES Permit require that accumulated precipitation be inspected for the presence of oil before it is discharged from the secondary containment system, if the discharge is directed to a waterway. Chelsea Terminal conducts an inspection of the facility's discharge at secondary containment structures and/or the oil/water separator prior to initiating discharge. This inspection is incorporated as a component of the quarterly SWPP Inspection. Inspection records are kept with the SWPPP.

5.5 Other Inspections

The ground water treatment system is monitored by a terminal employee and equipment is inspected/repared at a minimum of twice a month by a qualified person. The entire system is over hauled and cleaned semi annually. Temporary Solution Status (TSS) reports are submitted to MassDEP semi-annually.

5.6 Corrective Actions

If any of the following conditions occur, the terminal shall review and revise the selection, design, installation and implementation of control measures, as necessary to ensure that the condition is eliminated and will not be repeated in the future;

1. An unauthorized release or discharge or a release of a reportable quantity of pollutants as described in 40 C.F.R. §302
2. A discharge violates any permit condition, including a numeric effluent limit
3. A determination by the terminal or EPA that the control measures (including BMPs) appear to be ineffective in achieving the general objectives of controlling pollutants in discharges or are not stringent enough for the discharge to meet applicable water quality standards
4. An inspection or evaluation of the Terminal by a regulatory authority determines that modifications to the control measures are necessary to meet the non-numeric effluent limits in this permit
5. A finding by the terminal during a quarterly inspection that control measures are not being properly operated and maintained

If any of the following conditions occur, the terminal must review the selection, design, installation, and implementation of control measures (including BMPs) to determine if

modifications are necessary to meet the effluent limits:

1. If a change in design, construction, operation, or maintenance, materials storage, or activities at the terminal that significantly changes the nature of pollutants discharged in storm water from the terminal, or significantly increases the quantity of pollutants discharged.
2. If new data identifies the integrity of the storm water system and level of groundwater infiltration into the storm water system.

If the terminal determines that changes are necessary, any modifications to control measures (including BMPs) must be made before the next discharge if possible, or as soon as practicable following that discharge

5.7 Record Keeping

The Chelsea Terminal shall document any violation of numeric or non-numeric effluent limitations with a date and description of the corrective actions taken.

The terminal will keep a copy of the current SWPPP certifications including initial certification, any recertification, at the terminal and shall make it available for inspection by EPA and/or MassDEP. If practicable, post a copy of this SWPPP in portable document format to the terminal's publicly-assessable website. The terminal shall amend and update this SWPPP within 14 days for any changes at the terminal that result in a significant effect on the potential for the discharge of pollutants to the Chelsea River.

**SECTION 6:
DOCUMENTATION TO SUPPORT ELIGIBILITY CONSIDERATIONS UNDER
OTHER FEDERAL AND STATE LAWS**

6.1 Documentation Regarding Endangered Species

Prior to issuance of the current final permit, EPA Region 1 consulted both the federal and state agencies to evaluate impacts of proposed discharge on the endangered species, if any. It was determined that no federally listed species are likely to reside in the receiving waters.

6.2 Documentation Regarding Historic Properties

Chelsea Terminal has no plans to construct or install any new storm water control measures and, no historic structural exists near the designated outfalls.

6.3 Documentation Regarding NEPA Review (if applicable)

The propose action is not subject to NEPA review

6.4 2Documentation Regarding MEPA Review (if applicable)

The propose action is not subject to MEPA review

6.5 MassDEP - Section 401(a) Water Quality Certification

MassDEP issued water quality certification on September 12, 2014.

6.6 Coastal Zone Management (CZM) Federal Consistency Review

CZM issued a consistency certification on September 23, 2014.

SECTION 7 SWPPP MODIFICATIONS

7.1 Storage/Process Modification(s)

Chelsea Terminal shall notify EPA/MassDEP when adding new chemical or replace any chemicals, chemical additives, or bio-remedial agents that introduce new pollutants to the storm water discharge.

Chelsea Terminal shall notify EPA/MassDEP within 10 days of becoming aware of any changes, planned or otherwise, in the operations at the terminal that may influence the permitted discharge.

7.2 Changes in Storm Water Discharge Quality

Chelsea Terminal shall amend and update the SWPPP with in 14 days for any changes at the Terminal that result in a significant effect on the potential for the discharge of pollutants to Boston Harbor.

SECTION 8 SWPP PLAN CERTIFICATION

8.1 Certification and Re-Certification

This SWPPP shall be updated and certified by an authorized person within 90 days of the effective date of the current permit. The authorized person shall certify that the SWPPP has been prepared, that it meets the requirements of the current NPDES permit, and that it reduces the pollutants in the discharge to the extent practicable.

The Chelsea Terminal shall certify annually their compliance with the SWPPP requirements. If the terminal is not in compliance with the SWPPP requirements, the annual certification shall state the non-compliance and the remedies which are being undertaken

Chelsea Terminal shall certify at least annually that the previous year's inspections and maintenance activities were conducted, results recorded, records maintained, and that the facility complies with this permit. If the terminal is not in compliance with any aspect of this permit, the annual certification shall state the non-compliance and the remedies which are being undertaken.

Any amended, modified or new versions of the SWPPP shall be re-certified and signed by the authorized person.

Annual certifications and re-certifications shall be signed in accordance with the requirements identified in Part. D of the current permit.

8.2 Plan Certification

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.

Signature:
Name: Tom Keefe, VP EHS
Global Companies LLC

Date