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Region III Oil Program Activities

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REGION III OIL PROGRAM

EPA Region 3 covers the States of Pennsylvania, Maryland, Virginia, West Virginia and Delaware, and the District of Columbia. The Regional office is located in Philadelphia, PA with field offices located in Wheeling, WV and Annapolis, MD. The Chesapeake Bay is one of Region 3's most significant environmental resources and the focus of a great deal of protection and restoration.

The Region's Oil Program is part of the Removal Branch of the Hazardous Site Cleanup Division. Oil Program staff perform a variety of functions including reviewing and approval of Facility Response Plans; supporting area planning activities, conducting SPCC inspections, training and exercises; initiating enforcement activities; and most importantly oil spill response which is conducted by EPA's On-Scene Coordinators.

SPCC INFORMATION

PREVENTING PIPELINE CORROSION

Corrosion is a major contributor to failures of pipelines transporting oil. When a pipeline fails, the results can be devastating in terms of property damage and contamination of the environment.

WHAT IS THE PROBLEM?

Unprotected pipelines, whether buried in the ground, exposed to the atmosphere, or submerged in water, are susceptible to corrosion. Without proper maintenance, every pipeline system will eventually deteriorate. Corrosion can weaken the structural integrity of a pipeline and make it unsafe for transporting materials. However, technology exists to extend pipeline structural life indefinitely if applied correctly and maintained consistently.

HOW DO WE CONTROL PIPELINE CORROSION?

Four common methods used to control corrosion on pipelines are protective coatings and linings, cathodic protection, materials selection, and inhibitors.

Coatings and linings are principal tools for defending against corrosion. They are often applied in conjunction with cathodic protection systems to provide the most cost effective protection for pipelines.

Cathodic protection (CP) is a technology which uses direct electrical current to counteract the normal external corrosion of a metal pipeline. CP is used where all or part of a pipeline is buried underground or submerged in water. On new pipelines, CP can help prevent corrosion from starting; on existing pipelines, CP can help stop existing corrosion from getting worse.

Materials selection refers to the selection and use of corrosion-resistant materials such as stainless steels, plastics, and special alloys to enhance the lifespan of a structure such as a pipeline. Materials selection personnel must consider the desired lifespan of the structure as well as the environment in which the structure will exist.

Corrosion inhibitors are substances which, when added to a particular environment, decrease the rate of attack of that environment on a material such as metal or steel reinforced concrete. Corrosion inhibitors can extend the life of pipelines, prevent system shutdowns and failures, and avoid product contamination.

Evaluating the environment in which a pipeline is or will be located is very important to corrosion control, no matter which method or combination of methods is used. Modifying the environment immediately surrounding a pipeline, such as reducing moisture or improving drainage, can be a simple and effective way to reduce the potential for corrosion.

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Furthermore, using persons trained in corrosion control is crucial to the success of any corrosion mitigation program. When pipeline operators assess risk, corrosion control must be an integral part of their evaluation.

WHAT IS THE SOLUTION?

Corrosion control is an ongoing, dynamic process. The keys to effective corrosion control of pipelines are quality design and installation of equipment, use of proper technologies, and ongoing maintenance and monitoring by trained professionals. An effective maintenance and monitoring program can be an operator's best insurance against preventable corrosion related problems.

Effective corrosion control can extend the useful life of all pipelines. The increased risk of pipeline failure far outweighs the costs associated with installing, monitoring, and maintaining corrosion control systems. Preventing pipelines from deteriorating and failing will save money, preserve the environment, and protect public safety.

The above article contains information as supplied by the National Association of Corrosion Engineers (NACE).

SPCC Q&A's

If a tank is taken out of service, what measures must a facility take in order to be exempt from SPCC regulations?

Any tank taken out of service must have all pipes and fittings disconnected and sealed and all contents removed from the tank. If a tank is taken out of service and this results in the facility's oil storage capacity to drop below SPCC thresholds, then the facility is no longer SPCC regulated. However, EPA evaluates a facility's storage capacity based on 100% of tank capacities, regardless of the quantities a facility "normally" stores in the tank. Partial filling of a tank would not count towards exempting a facility from the regulations.

Furthermore, alteration of a tank in an effort to reduce capacity is not acceptable. In 1998, Region III settled an enforcement case against a facility that intentionally installed a hole in the side of their tank because they lacked adequate secondary containment. EPA alleged that the terminal did not have adequate engineering safeguards in place or adequate secondary containment to prevent or capture spills from the entire tank. EPA collected a \$72000 penalty.

Are SPCC Plans required for hazardous substances or hazardous wastes?

Only in the event that the hazardous substances or wastes are

mixed with oil. However, EPA strongly recommends that owners or operators of facilities storing hazardous substances or wastes consider implementing applicable requirements of the SPCC regulations as a means of reducing spill cleanup costs and environmental liability.

PROPOSED RULES TO BE FINALIZED

The Proposed Rules for the Spill Prevention, Control and Countermeasures (SPCC) found at 40 CFR 112 may be finalized by the end of the calendar year. The rules, originally proposed in 1991, involve changes in the applicability of the regulation and the required procedures for the completion of SPCC Plans, as well as the addition of a facility notification provision. The proposed rule also reflects changes in the jurisdiction of section 311 of the Clean Water Act (CWA) made by amendments to the CWA.

FRP INFORMATION

FACILITY RESPONSE PLAN Q & A'S

Question: A military facility that meets the criteria for completing an FRP has frequent rotation of its personnel, and so the position of qualified individual changes often. Is it acceptable for the title of the position and a telephone number be given in lieu of an individual's name in the emergency response action plan?

Answer: According to 40 CFR § 112.20(h), the response plan must follow the model in Part 112, Appendix F, unless the plan is prepared to meet another state or federal requirements. Thus, the military facility's plan must include the specific identity of the qualified individual. The individual's name may be limited to the Emergency Notification Phone List, and the rest of the Plan can use the title "Qualified Individual" instead of naming a specific individual. Plan revisions regarding personnel changes do not require approval, however, the revisions do need to be submitted to EPA as the revisions occur.

Question: Which Federal agencies are responsible for implementing OPA?

Answer: Executive Order 12777, issued on October 18, 1991, delegated the authority to implement OPA to several federal agencies. EPA carries the responsibility for oil spill prevention and preparedness activities associated with non-transportation-related onshore facilities. EPA is also responsible for response activities and Area Contingency Plans in the Inland Zone. Most OPA provisions delegated to EPA are being implemented by EPA's Oil Program Center, a part of the Office of Emergency and Remedial Response within the Office of Solid Waste and Emergency

Response and the Regions. The USCG is responsible for OPA requirements related to marine transportation-related facilities. The DOT's Office of Pipeline Safety (OPS), within the Research and Special Programs Administration (RSPA), administers the requirements for response plans for onshore transportation facilities. Executive Order 12777 delegated the responsibility for oil spill planning and preparedness for off-shore fixed facilities beyond the coastline to the Department of the Interior (DOI). The Executive Order also required the National Oceanic and Atmospheric Administration (NOAA) to develop regulations for natural resource trustees to assess damages to natural resources caused by oil discharges.

PLANNING INFORMATION PREPAREDNESS ACTIVITIES

ALASKA'S OIL SPILL RECOVERY PRODUCES GUIDEBOOK TO DISASTER

While state and oil industry workers struggled to mop up the 11 million gallons of oil spilled by the Exxon Valdez in 1989, no one knew what changes were in store for the communities hit by the disaster or how to prepare for them.

In the 10 years since the spill, some of those communities unraveled, individuals struggled with depression, alcohol abuse increased, families fell apart, and businesses struggled to get back on track.

Because it was a man-made, or what is known as a technological disaster, there was no handbook on how to help the communities and victims cope and resume their normal lives.

To remedy that, the Prince William Sound Regional Citizen's Advisory Council has spent the last several years trying to help communities in the Sound deal with the aftermath. And it has compiled what it discovered in what is believed to be the first "how-to" guidebook on how communities can prepare and deal with man-made disasters. It's called "Coping with Technological Disasters: A User Friendly Guidebook."

The RCAC was formed after the spill as an independent, nonprofit organization by the Oil Pollution Act of 1990 to serve as a watchdog over the Valdez Marine Terminal and related oil tankers. The law mandates that the oil industry fund the agency.

Man-made disasters tend to have a more profound emotional

impact on people, sociologists who study disasters have discovered.

Technological disasters usually carry after shocks, including journalists, attorneys, dueling scientists and conflicts between politicians and government agencies.

Technological disasters cause schisms in communities and lead to conflicts and litigation.

The guidebook offers practical advice, such as how local governments should set up response teams and which issues must be addressed. It also provides copies of public service announcements to help a community better understand what is going on. And it offers practical advice for how businesses can prepare for labor and supply shortages that often come with technological disasters.

For more information about the guidebook call RCAC in Anchorage at 907-277-7222 or 907-835-5957 Copyright 1999, Anchorage Daily News Knight Ridder/Tribune Business News, All Rights Reserved

Article taken from Natalie Phillips, Anchorage Daily News

INLAND AREA CONTINGENCY PLAN NOW AVAILABLE ON THE INTERNET

The Region III Inland Area Committee is comprised of federal, state and local officials. As mandated by the Oil Pollution Act of 1990, its purpose is to prepare and maintain an Area Contingency Plan (ACP) and work with state and local officials to enhance their contingency planning efforts and to assure replanning of joint response efforts. The Region III Inland ACP can now be found on the Internet ("<http://www.epa.gov/reg3hwmd/iacp/r3iacp.htm>").

For additional information, contact the Region III Inland Area Committee Chairperson, Stephen Jarvela at (215)814-3259.

CNGT HOLDS TABLE TOP EXERCISE

Consolidated Natural Gas Transmission Corporation (CNGT) recently held a table top spill release exercise at its Bens Run, WV facility on August 27, 1999. Representatives from CNGT Corporation, EPA Region 3, Tyler County OES, Tyler County LEPC, and CNGT's Oil Spill Response Contractor, Weavertown Environmental participated in the exercise. CNGT's Bens Run facility consists of a 1 million gallon storage tank holding natural gasoline which is piped to the storage tank from CNGT's Hastings, WV Extraction

plant. CNGT's Bens Run facility also consists of a transfer pipeline from the storage tank to a river barge loading area. The spill exercise scenario entailed a catastrophic failure of the 1 million gallon storage tank releasing approximately 750,000 gallons of natural gasoline, a highly volatile and flammable material. The exercise drilled participants in making required regulatory and company policy notifications, initiation of both incident and unified command structures to respond to the incident, mock mobilization of personnel, equipment and resources to address the release, preparation of response planning objectives and response strategies to address the release. The drill was successful in identifying weaknesses in the emergency response plan and response structure, allowing local and federal regulatory officials to learn more about the response capability and structure of CNGT as well as CNGT learning more about the response capabilities and responsibilities of local and federal agencies. Future meetings between CNGT, Tyler County OES/LEPC and EPA Region 3 representatives are being scheduled to further discuss response capabilities and regulatory requirements. CNGT conducted the spill drill as part of their Facility Response Plan (FRP) which requires an annual spill drill. FRP plans are required under the Oil Pollution Act of 1990 (OPA '90). OPA '90 requires facilities capable of causing significant and substantial harm to the environment due to a release of hazardous substances or oil into the environment to develop such plans. Please contact Linda Ziegler, EPA FRP Coordinator at (215) 814-3277 for additional information concerning FRP requirements.

UPCOMING EVENTS

FRESHWATER SPILLS SYMPOSIUM

EPA will host the Third Biennial Freshwater Spills Symposium in Albuquerque, NM March 6-8, 2000.

The symposium offers an opportunity for Local, State, Federal, and industry responders and planners, natural resource trustees and managers and facility response planners to engage in an informative exchange on the unique problems of freshwater oil spills.

The symposium will encourage the transfer of technology, promote the exchange of new ideas, and provide a forum for discussion of issues regarding freshwater oil spill response through a series of individual presentations and panel discussions. A variety of topics will be covered in a series of concurrent breakout sessions.

The symposium will be held at the Radison Hotel and

Conference Center, Albuquerque, NM, (505)888-3311. A website has been set up for registration, <http://www.epa.gov/oilspill/fss/register.htm>.

REGION III RRT MEETING

The next regularly scheduled Region III RRT meeting will be held January 25 through the January 27, 2000, in Baltimore, MD. For further information, contact Linda Marzulli at (215)814-3256.

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