



Spill Prevention, Control, and Countermeasure (SPCC) Plan

Benjamin Franklin Bridge
Betsy Ross Bridge
Commodore Barry Bridge
Walt Whitman Bridge

In NJ and PA

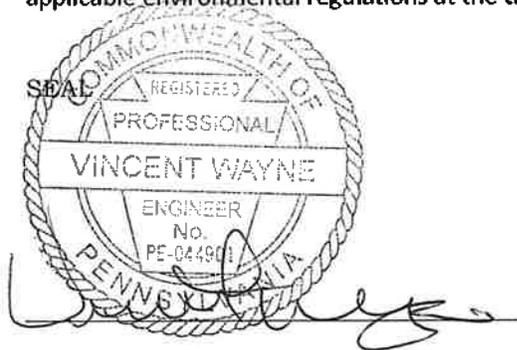
BH No. 77397-01

October 2021



PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that the Spill Prevention Control and Countermeasures Plan for the Delaware River Port Authority bridges (Benjamin Franklin, Betsy Ross, Commodore Barry, and Walt Whitman) has been prepared in accordance with federal (40 CFR 112, 122, 123 and 124) and New Jersey state (N.J.A.C. 7:14B) regulations as well as good engineering and environmental practices. I attest that I am familiar with the above noted requirements and that I visited and examined all facilities. The plan, if implemented properly, is adequate for the facilities named above. This plan is based on the conditions observed at the time of the inspection and applicable environmental regulations at the time of the preparation of this document.



10-11-21
Date

Buchart Horn, Inc.,
Professional Engineer Registration Number: PE 044901

DRPA MANAGEMENT APPROVAL

This document is fully approved by DRPA management, which will provide all the necessary funds and manpower to implement the Plan as herein described. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with applicable laws and regulations.

John T. Hanson
Chief Executive Officer

Date

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LIST OF ACRONYMS

AST	Aboveground Storage Tank
BFB	Benjamin Franklin Bridge
BMP	Best Management Practice
BRB	Betsy Ross Bridge
CBB	Commodore Barry Bridge
CFR	Code of Federal Regulations
CCMUA	Camden County Municipal Utilities Authority
COO	Chief Operating Officer
CWA	Clean Water Act
DOT	Department of Transportation
DRPA	Delaware River Port Authority
EPA	Environmental Protection Agency
MOU	Memorandum of Understanding
MS4	Municipal Separate Storm Sewer System
NJDEP	New Jersey Department of Environmental Protection
NPDES	National Pollutant Discharge Elimination System
PADEP	Pennsylvania Department of Environmental Protection
POTW	Publicly Owned Treatment Works
SPCC	Spill Prevention Control and Countermeasures
SWMP	Storm Water Management Program
SWPP	Storm Water Pollution Prevention
UST	Underground Storage Tank
WPCF	Water Pollution Control Facility
WWB	Walt Whitman Bridge

1 INTRODUCTION

This document is a Spill Prevention Control and Countermeasures (SPCC) Plan for the Delaware River Port Authority transportation facilities that meets the requirements of the Federal Oil Pollution Act (40 CFR 112). This plan is an update to the “REVISED DRAFT SPILL PREVENTION, CONTROL AND COUNTERMEASURE AND STORMWATER POLLUTION PLAN DATED MAY 2003 PREPARED BY WESTON SOLUTIONS, INC”. The source of material for this report update was taken from this document.

The purpose of this plan is to minimize and abate hazards associated with oil products, which have the potential to cause pollution of air, land, or water or endangerment of public health and safety through their accidental release. This document also satisfies requirements of New Jersey and Pennsylvania state regulations, which require preparation of the Release Response Plan (N.J.A.C. 7:14B) and Spill Prevention Response Plan (PA Code §245.512).

1.1 Scope of SPCC Plan

The SPCC Plan describes the actions to be taken to prevent the spill of oil and petroleum products. The United States Environmental Protection Agency (U.S.EPA) regulations contained in Title 40 Codes of Federal Regulations Part 112 (40 CFR 112), require a Spill Prevention Control & Countermeasure (SPCC) Plan for any commercial non-transportation facility storing an oil product which meets one or more of the following conditions:

1. The total aboveground storage capacity exceeds 1,320 gallons, with only containers with capacity of 55 gallons and above accounted in the volume estimate;
2. The underground storage capacity exceeds 42,000 gallons,
3. Due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States, or adjoining shorelines or waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or Deepwater Port Act, or affecting certain natural resources.

Navigable waters are broadly defined under the Clean Water Act and Oil Pollution Act to include all waters that are used in interstate or foreign commerce, all interstate waters including wetlands, and all intrastate waters, such as lakes, rivers, streams, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. Essentially, the term “navigable waters” refers to any natural surface water in the U.S. Non-transportation facilities are those not involved in bulk transport of oil products, as defined in Memorandum of Understanding (MOU) of 1971 between USEPA and USDOT.

The Delaware River Port Authority is subject to the SPCC requirements since the total aboveground storage capacity exceeds 1,320 gallons at each bridge maintenance facilities. A spill from the tanks could be discharged to navigable waters through an adjacent storm water collection system.

The SPCC plan is not required to be filed with U.S. EPA, but must be certified by a registered professional engineer. A working copy must be available for on-site review during normal office hours by U.S. EPA region II and New Jersey Department of Environmental Protection (NJDEP) personnel or by U.S. EPA region III and Pennsylvania Department of Environmental Protection (PADEP) personnel depending on the facility location.

The SPCC plan must be submitted to the U.S. EPA Regions II and III administrators and the state agencies along with the other information specified in 40 CFR 112.4 if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single event;
2. The facility discharges more than 42 gallons of oil in each of two spill events within any twelve-month period.

A harmful quantity of oil is defined as an oil discharge that causes a film or sheen upon the water or adjoining shorelines; discolors the water or adjoining shorelines; or causes an emulsion or sludge to be deposited beneath the surface of the water or upon adjoining shorelines.

If a spill event meets either of the above thresholds, then spill information must be reported to U.S. EPA Regions II and III within 60 days. The report must contain the following information:

1. Name of the facility;
2. Name(s) of the owner or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
7. The cause of such discharge including a failure analysis of system or subsystem in which failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence;
9. Such other information as the regional administrator may reasonably require that is pertinent to the plan or spill event.

The SPCC plan shall be amended within six months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential.

The plan must be reviewed at least once every five years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. All changes must be certified by a registered professional engineer.

Owners and operators failing or refusing to comply with the SPCC regulations shall be subject to a civil penalty as specified in Section 311(b)(6)(B) of the Clean Water Act, 33 U.S.C. §1 321(b)(6)(B).

1.1.1 Amendments to the SPCC Plan - 40 CFR 112.5

Once an SPCC plan has been developed, under certain circumstances it may be amended by the U.S. EPA Regional Administrator or by the facility owner or operator. The regional Administrator may require amendment to the plan following a single discharge at the facility in excess of 1000 gallons or following two discharges in "harmful quantities" that occur within any twelve-month period and are reportable under the Federal Water Pollution Control Act.

The SPCC regulations require the owner or operator to amend the SPCC plan whenever there is a change in facility design, construction, operation or maintenance that materially affects the facility's potential for discharging oil or hazardous materials. Such amendments shall be fully implemented not later than six months after such change occurs.

The regulation also requires the owner or operator to review and evaluate the SPCC Plan every five years. Amending the plan may be part of this review. Within six months following the review, the owner or operator may amend the plan to incorporate more effective control and prevention technology if the technology will significantly reduce the likelihood of a release, and the technology has been field proven at the time of the review. All amendments must be certified by a registered professional engineer per Sec. 112.3(d) of the SPCC regulations.

The DRPA personnel responsible for reviews of this SPCC Plan at five-year intervals are identified in Appendix B.

2 FACILITY INFORMATION

The following bridge facilities, owned and operated by DRPA, span the Delaware River and are located in Pennsylvania (EPA Region III) and New Jersey (EPA Region II):

1. Benjamin Franklin Bridge (BFB)
2. Betsy Ross Bridge (BRB)
3. Commodore Barry Bridge (CBB)
4. Walt Whitman Bridge (WWB)

Maintenance facilities for the BFB, BRB, and CBB are located in New Jersey and are regulated by NJDEP. The maintenance facility for the WWB is located in Pennsylvania and is under the jurisdiction of PADEP. This SPCC Plan describes the BMPs that are employed at all facilities to reduce the potential for pollution of surface waters.

2.1 Benjamin Franklin Bridge

The Benjamin Franklin Bridge is the oldest bridge owned by the DRPA and construction was started in 1922. The bridge was placed into operation in 1926. It spans the Delaware River from Florist Street in Philadelphia, Pennsylvania to Birch Street in Camden, New Jersey. The toll plaza, maintenance area and materials storage are all on the New Jersey side of the bridge and therefore are under the jurisdiction of the NJDEP. The DRPA does not own contiguous property beyond the ends of the bridge, but owns several properties used for maintenance of the bridge and associated vehicles as well as PATCO rail maintenance yard used for emergency repairs in the immediate vicinity of the New Jersey end of the bridge. Figures 1A and 1B presents a site map of the Benjamin Franklin Bridge maintenance facilities. The main maintenance building is located at the intersection of the 5th and Elm Street, and the approximate coordinates are 39° 56' 53" Latitude, and 75° 07' 18" Longitude. A map of the entire bridge span is included as Figure A-1 in Appendix A.

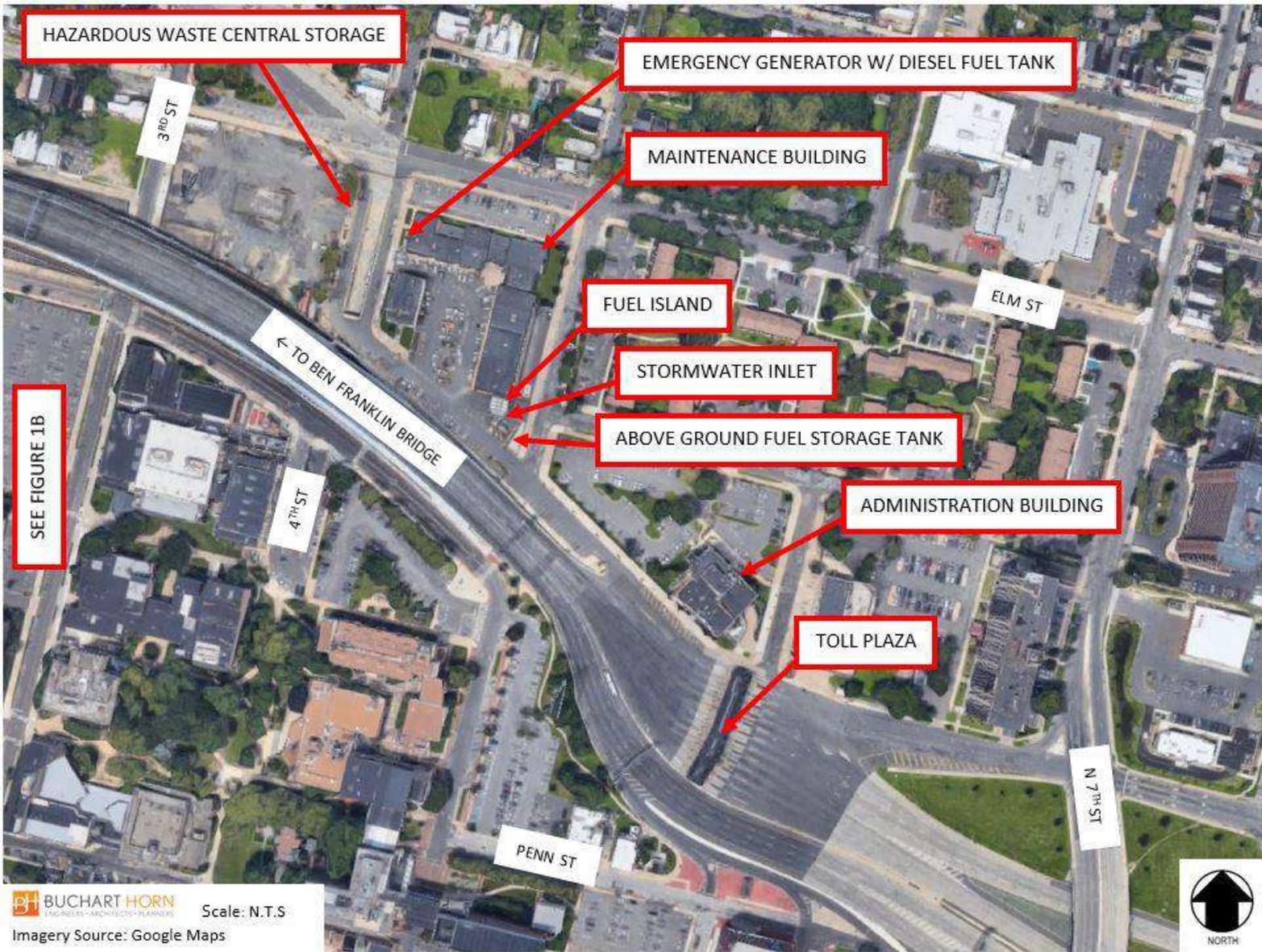
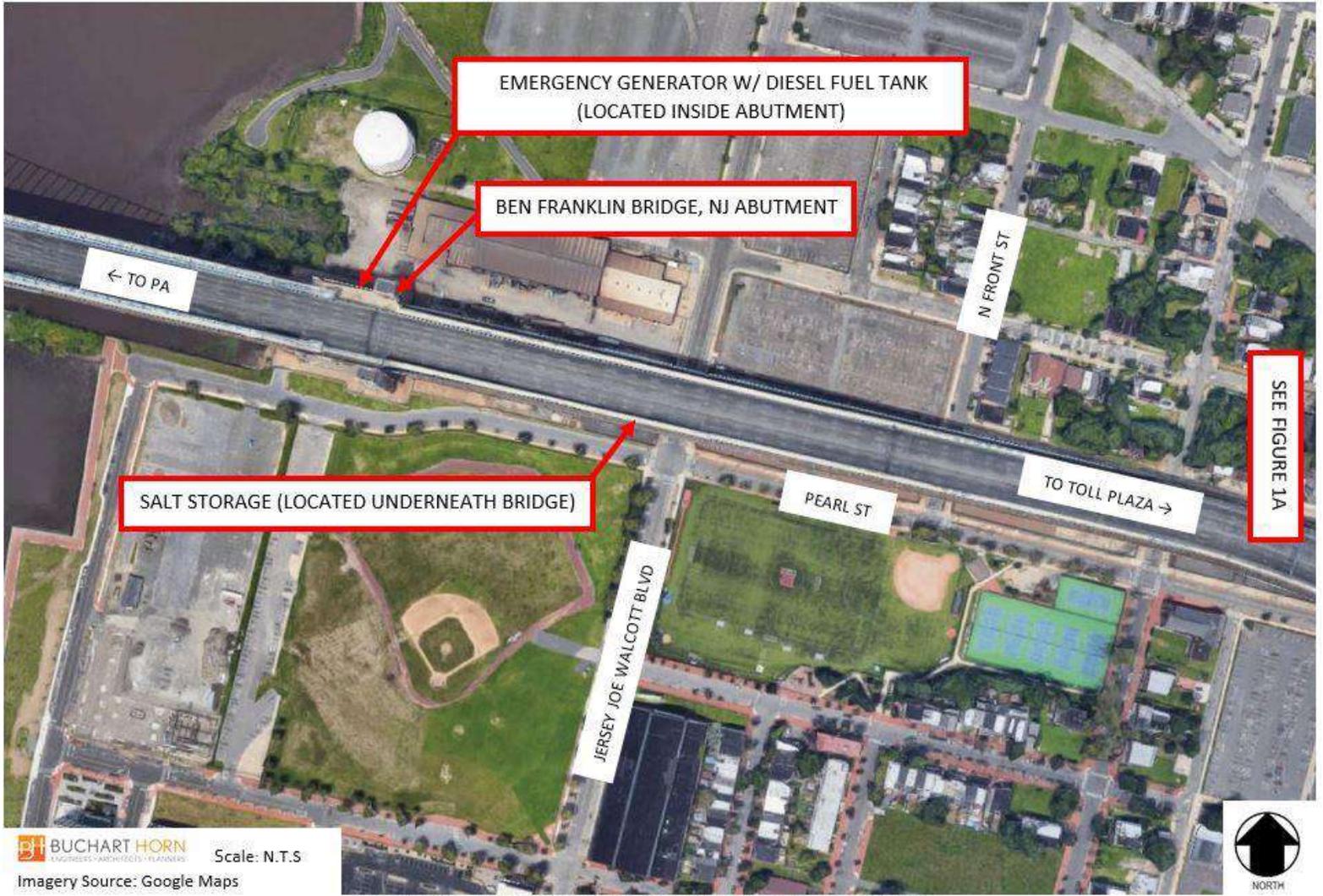


FIGURE 1A – BENJAMIN FRANKLIN BRIDGE FACILITIES DIAGRAM



BUCHART HORN
ENGINEERS - ARCHITECTS - PLANNERS
Scale: N.T.S
Imagery Source: Google Maps

FIGURE 1B – BENJAMIN FRANKLIN BRIDGE ABUTMENT DIAGRAM

2.2 Betsy Ross Bridge

The construction of the Betsy Ross Bridge began in 1969 and the bridge was placed in operation in 1976. It spans the Delaware River from Route 95 in Philadelphia, Pennsylvania to Route 130 in Pennsauken, New Jersey. The toll plaza, maintenance area and materials storage are all on the New Jersey side of the bridge and therefore are under the jurisdiction of the NJDEP. Figure 2 shows the site layout of the Betsy Ross Bridge toll plaza and maintenance facilities. Maintenance facility's approximate coordinates are 39° 58' 37" Latitude, and 75° 02' 57" Longitude.

2.3 Commodore Barry Bridge

Construction began on the Commodore Barry Bridge in 1969 and the bridge was placed in operation in 1974. The Commodore Barry Bridge spans the Delaware River from Law Street in the City of Chester, Pennsylvania to Bridgeport, New Jersey. The toll plaza, maintenance area and materials storage are all on the New Jersey side of the bridge and therefore are regulated by the NJDEP. The Commodore Barry Bridge toll plaza is similar to those for the three other bridges that are described in this report. The DRPA owns the Route 322 corridor in New Jersey from the bridge to Route 130. Figure 3 shows the Commodore Barry Bridge toll plaza and maintenance facility layout. The approximate coordinates of the maintenance facility are 39° 48' 32" Latitude, and 75° 21' 10" Longitude.



FIGURE 2 – BETSY ROSS BRIDGE FACILITIES DIAGRAM

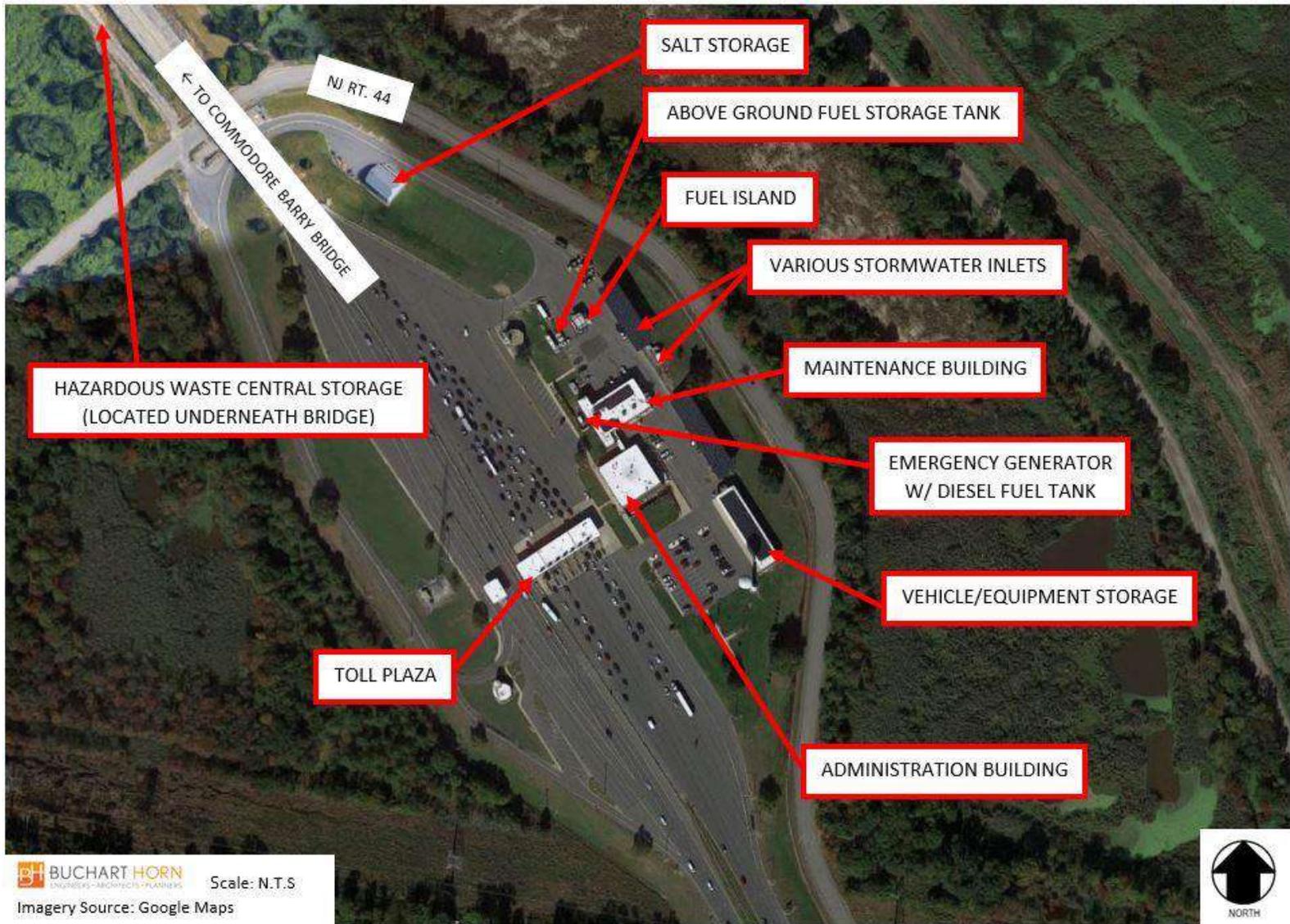
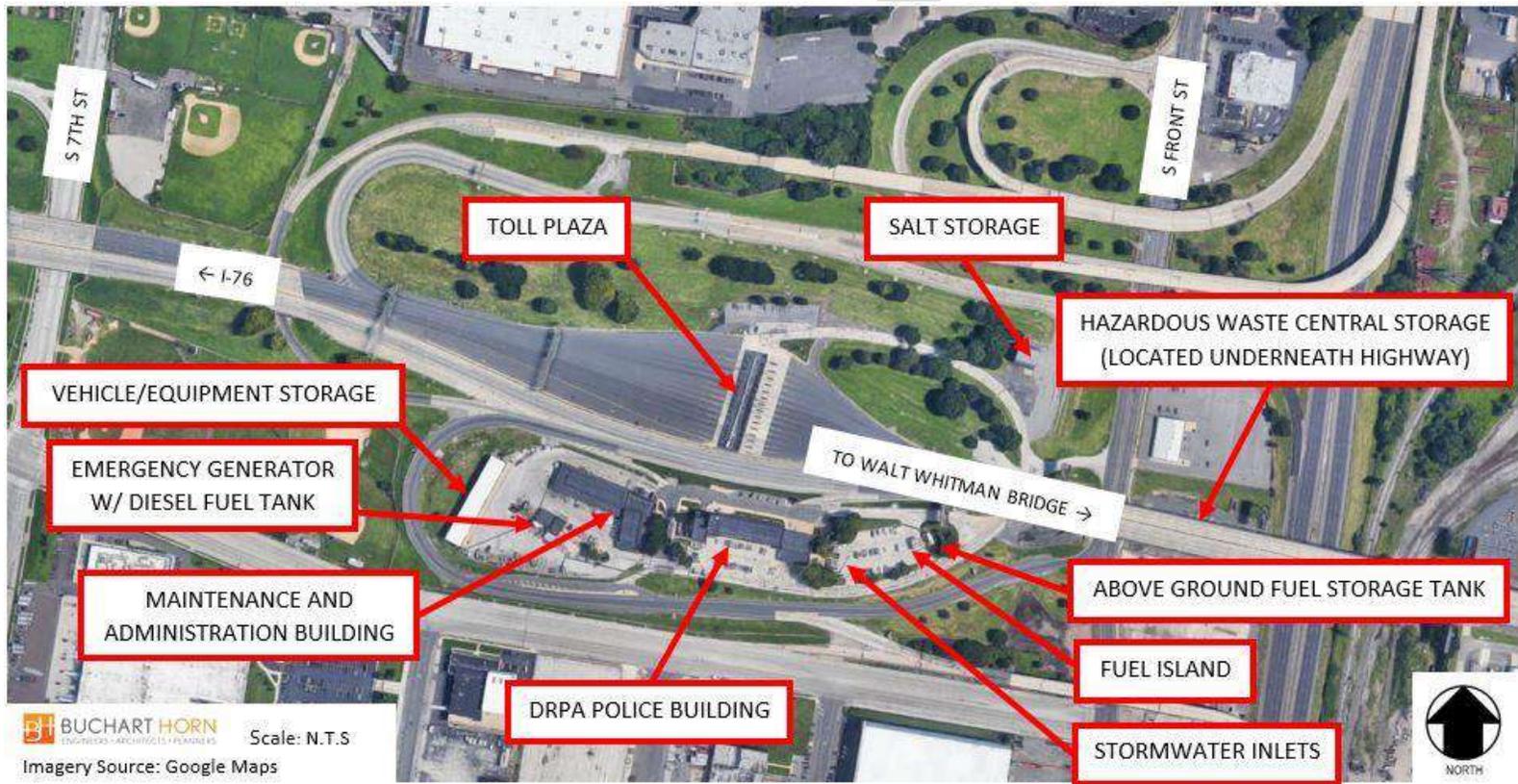


FIGURE 3 – COMMODORE BARRY BRIDGE FACILITIES DIAGRAM

LOGAN TOWNSHIP, GLOUCESTER COUNTY, N.J.

2.4 Walt Whitman Bridge

The construction of the Walt Whitman Bridge began in 1953. The bridge was placed into operation in 1957. It carries Interstate Route 76 across the Delaware River just north of the Philadelphia Naval Shipyard in South Philadelphia to just north of Gloucester City, New Jersey. The toll plaza, maintenance area and materials storage are all on the Pennsylvania side of the bridge and therefore would be regulated by PADEP. Figure 4 shows the site layout of the Walt Whitman Bridge toll plaza and maintenance facilities. The DRPA owns the Interstate Route 76 corridor for a distance of approximately 6 miles west of the toll plaza. The approximate coordinates of the maintenance facility are 39° 54' 37" Latitude, and 75° 09' 16" Longitude.



BUCHART HORN
 Scale: N.T.S.
 Imagery Source: Google Maps

FIGURE 4 – WALT WHITMAN BRIDGE FACILITIES DIAGRAM

2.5 Spill Prevention Team Members

Persons holding the following positions are responsible for the authorization and implementation of this SPCC Plan. Individuals and contact numbers are located in Appendix B, where they can be updated without recertification of this plan.

Facility Name: Benjamin Franklin Bridge

Betsy Ross Bridge

Commodore Barry Bridge

Walt Whitman Bridge

Mailing Address: One Port Center, 2 Riverside Drive, P.O. Box 1949, Camden, NJ 08101-1949

Owner: Delaware River Port Authority

Designated Person Responsible for Reviewing, Approving, and Authorizing Corporate Resources for Prevention of Oil Spills and Storm Water Pollution:

Chief Operating Officer (COO)

Other Personnel Responsible for Implementing the Program to Prevent Oil Spills and Storm Water Pollution:

Environmental Advisor

Bridge Director

Personnel Responsible for Performing Routine Inspections of the Facility to Detect Oil Spills and Storm Water Pollution:

Maintenance Supervisor (if spill occurs in the facility)

Patrol Officer (if spill occurs on the highway)

Personnel Responsible for Initiating Response to Oil Spills and Storm Water Pollution:

Maintenance Supervisor (if spill occurs in the facility)

Patrol Officer (if spill occurs on the highway)

Personnel Responsible for Coordinating Immediate Response to Oil Spills and Storm Water Pollution:

Dispatcher

2.6 Duties of the Pollution Prevention Team Members

The DRPA Chief Operating Officer, Environmental Advisor, Maintenance Supervisors, Patrol Officers, and Dispatcher are the core members of the team. Maintenance Supervisors are encouraged to assign additional site members to the team as part of their employee involvement initiatives. All of the employees working at the maintenance facilities will receive training concerning pollution prevention BMPs and emergency reporting procedures.

2.6.1 Duties of the Chief Operating Officer and Environmental Advisor

The Chief Operating Officer shall ensure that there are adequate corporate resources for the prevention, control and countermeasures of oil spills. They shall review and approve the SPCC plan every 5 years and when there are revisions to the plan.

The Environmental Advisor serves as an information resource guide to assist with environmental regulatory issues. His/her responsibilities include:

- a) Ensuring the facility SPCC and SWPP Plan is complete and up to date according to environmental regulations.
- b) Preparing and submitting any written follow-up reports required by government agencies after a spill or release and for reporting the release to senior management.
- c) Reviewing and updating the document whenever there is a change in facility design, construction, operation or maintenance.
- d) Oversight of the implementation of SPCC and SWPP Plan.
- e) Follow up to the incidents and, with the NJDEP and/or PADEP approval, provide for treating, storing or disposing of residues, contaminated soil, etc., from a discharge, fire or explosion at the facility.

2.6.2 Duties of the Maintenance Supervisor and Patrol Officer

Maintenance Supervisors and Patrol Officers are ultimately responsible for the execution of tasks outlined in the Plan. They serve as 1st responders to imminent or actual emergency situations. The Maintenance Supervisor is also accountable for the prevention of spills and leaks at the facility that could adversely impact surface water or ground water. The term Maintenance Supervisor is used generally to refer to the DRPA manager or other person with overall responsibility for the day-to-day operation of the maintenance facility. The term Patrol Officer refers to the police servicing DRPA bridges. The Maintenance Supervisor is responsible for ensuring that:

- a) The Plan is implemented, maintained and amended as necessary.

- b) Appropriate measures and controls are implemented and maintained.
- c) Periodic inspections are conducted.
- d) Corrective or follow-up actions are completed in a timely manner.
- e) Whenever there is a significant spill or release, fire or explosion, he must immediately identify the character, exact source, amount, and extent of emitted or discharged materials. This may be done by observation, review of records or if necessary by chemical analysis. The Dispatcher is to be contacted immediately with information above.
- f) Measures must be taken to ensure that fire, explosion, emission or discharge does not reoccur or spread to other materials. Measures include stopping facility activities, collecting and containing released materials or wastes, and removing or isolating containers.
- g) Significant releases are reported to the appropriate government agencies.
- h) Employees are periodically trained on Pollution Prevention.

Patrol Officer responsibilities include:

- a) Maintaining spill supplies in the patrol vehicle.
- b) Responding to highway accidents and inspecting for possible fuel/oil release.
- c) If conditions allow, applying spill kit materials to prevent fuel/oil from reaching storm water system
- d) Contacting dispatcher in case of the significant spill

2.6.3 Duties of the Police Radio Dispatcher:

The Dispatcher serves as the coordinator of response from various authorities. Dispatcher's responsibilities include:

- a) Activation of facility communication systems, where applicable, to notify facility personnel.
- b) Assessment of any possible hazards to human health or the environment that may result from a significant spill or discharge, fire or explosion,
- c) Coordinating emergency regime of work or stopping facility activities, if necessary.
- d) Contacting proper emergency authorities if incident exceeds ability of DRPA emergency services to respond.
- e) Contacting a local spill response contractor as necessary.
- f) Contacting National Response Center.

3 SPILL PREVENTION, CONTROL AND COUNTERMEASURES PLANNING

3.1 General

As previously noted, the facilities are to be evaluated for the potential of oil products to be discharged into navigable waters of the United States. This section of the document addresses spill prevention, control and countermeasures planning at all bridge facilities as specified in 40 CFR 112.

3.2 Regulatory Requirements Review

This portion of the Plan prepared in, accordance with the requirements of 40 CFR 112.7. The sections below discuss oil storage and spill prevention at the facilities. Contact numbers, checklist of emergency procedures, logs of inspections and personnel training are attached in Appendices B, C, and D.

3.2.1 Oil Storage Tanks and Patterns of Use - 40 CFR 112.7(a)

This section describes oil containers and their usage at each facility (as shown on Figures 2-1 through 2-4). Emergency procedures and contact numbers are located in Appendix C.

Benjamin Franklin Bridge

There is a large maintenance facility located on the South side of Elm Street between Fourth and Fifth Streets. Operations within this facility include a vehicle maintenance shop. Floor drains in the vehicle maintenance area drain to the City of Camden combined sewer system. These floor drains are equipped with oil-water separators that are cleaned once every two years. The maintenance facility is equipped with six (6) 325-gallon storage tanks containing 15W-40, 5W- 20, 5W-30 and waste oil, transmission fluid, and hydraulic fluid. A 9,800-gallon aboveground gas/diesel fuel tank is located near Fifth Street. This tank has capacity for 6,800 gallons of gasoline and 3,000 gallons of diesel fuel. The fuel island is located on the side of the maintenance building near Fifth Street. The fuel island has overhead protection and is situated on a concrete pad to prevent storm water run-on. All storm water drainage from this parking lot flows into the City of Camden combined sewer system. Two additional aboveground storage tanks contain diesel fuel for emergency generators. On the west side of the maintenance building is a 750-gallon tank is a double-walled steel construction encased in concrete. At the Camden anchorage, on the ground level west side is a 750-gallon tank is a double-walled steel construction. Bridge and toll plaza surfaces are cleaned with scrubbing machines. Wastewater from this operation is stored in 1,000- gallon tank until hazardous materials removal contractor transfers it to Camden wastewater plant.

Other operations located in the same building include a paint room, machine shop, break rooms and locker rooms, police facilities including a holding cell, and materials storage. All drains inside the building that connect to storm sewers have been sealed.

Betsy Ross Bridge

An office/maintenance building complex is located to the northeast of the toll plaza. There is a motor vehicle fuel depot just outside of the maintenance building. An 8,800-gallon aboveground fuel tank supplies two fuel pumps. It is divided into two compartments with capacity for 6,100 gallons of gasoline and 2,700 gallons of diesel fuel. The fuel pumps are located under a shelter and are placed on a raised concrete pad to prevent storm water run-on. An additional aboveground storage tank contains diesel fuel for the emergency generator. It is located east side of the administration building and is a 1,700 gallon tank double-walled steel construction.

Operations within the maintenance facility include a vehicle maintenance shop. Floor drains in the vehicle maintenance area drain to the sanitary wastewater treatment system. These floor drains are not equipped with oil — water separators. Fluids are stored in six (6) 325-gallon storage tanks containing 15W-40, SW-20, SW-30 and waste oil, transmission fluid, and hydraulic fluid.

Commodore Barry Bridge

An office/maintenance building complex is located to the east of the toll plaza. There is a motor vehicle fuel depot just outside of the maintenance building. A 8,800-gallon aboveground fuel tank supplies two fuel pumps. It is divided into two compartments with capacity for 6,100 gallons of gasoline and 2,700 gallons of diesel fuel. The fuel pumps are located under a shelter and are raised on a concrete pad to prevent storm water run-on. An additional aboveground storage tank contains diesel fuel for the emergency generator. It is located south side of the administration building and is a 750-gallon tank double-walled steel construction.

The maintenance shop stores motor oil, transmission fluid and hydraulic fluid in six (6) 325- gallon tanks located inside the building. Antifreeze is stored in one-gallon containers. Floor drains within the maintenance shop were closed off in 1993. These floor drains have been reopened and now drain to a 380-gallon holding tank that is emptied by hazardous waste contractor as needed. Sanitary sewage drains to an on-site septic system.

Walt Whitman Bridge

The maintenance facility at the Walt Whitman Bridge is very similar to the one at the Benjamin Franklin Bridge in its operation. All drains inside the maintenance building flow to the City of Philadelphia sanitary system. There are three oil-water separators at this facility. All inlets in the parking lot discharge to the City of Philadelphia combined sewer system. Motor oil, waste oil, hydraulic fluid, and transmission fluid are stored in six (6) 325-gallon tanks inside the shop.

In April 1993, the DRPA installed a dual compartment aboveground storage tank (AST). The tank is double-walled steel construction. The outer wall of the tank is coated with concrete. The compartments are 3,000

gallons used to store diesel fuel, and 9,000 gallons to store gasoline. Underground storage tanks, used prior to 1993, have been removed. All necessary remediation due to soil contamination was performed.

Two additional aboveground storage tanks contain diesel fuel for emergency generators. The maintenance generator located at the rear of the maintenance yard is a 2,400-gallon tank double-walled steel construction and inside the New Jersey anchorage is a 380 -gallon tank is constructed of double-walled steel. All of the ASTs at the facility are registered with PADEP under number 51-45258.

3.2.2 Potential Equipment Failure - 40 CFR 112.7(b)

Potential equipment failure scenarios are described in Table 3-1.

Table 3-1 Potential Equipment Failures

Potential Event	Spill Direction	Volume Released	Spill Rate
Complete failure of maintenance shop fluids storage tank with secondary containment intact.	Inside the secondary containment	0 gallons	Instantaneous
Complete failure of maintenance shop fluids storage tank with complete failure of secondary containment.	Inside the maintenance shop	Up to 325 gallons	Instantaneous
Complete failure of maintenance shop fluids storage tank with partial failure of secondary containment.	Inside the maintenance shop	Up to 325 gallons	Gradual to instantaneous
Complete failure of aboveground storage tank (BFB, BRB, CBB) with secondary containment intact.	Inside secondary containment	0 gallons	Instantaneous
Complete failure of aboveground storage tank (BFB, BRB, CBB) with complete failure of secondary containment.	On to paved surfaces	Up to 3,000 or 6,800 gallons	Instantaneous
Complete failure of aboveground storage tank (BFB, BRB, CBB) with partial failure of secondary containment.	On to paved surfaces	Up to 3,000 or 6,800 gallons	Gradual to instantaneous

Potential Event	Spill Direction	Volume Released	Spill Rate
Complete failure of aboveground storage tank (WWB) with secondary containment intact.	Inside secondary containment	0 gallons	Instantaneous
Complete failure of aboveground storage tank (WWB) with complete failure of secondary containment.	West, towards the maintenance building	Up to 3,000 or 9,000 gallons	Gradual to Instantaneous
Complete failure of aboveground storage tank (WWB) with partial failure of secondary containment.	West, towards the maintenance building	Up to 3,000 or 9,000 gallons	Gradual to instantaneous

3.2.3 Containment and Diversionary Structures - 40 CFR 112.7(c)

The facility has the following containment and diversionary structures and response equipment:

1. Each maintenance facility is equipped with sorbent material for minor spills and leaks. Spill pans are available for oil leaks during vehicle maintenance.
2. All fueling stations are located on raised concrete pads in the middle of paved parking lots. In the event of a spill curbing surrounding the parking lot will help to contain the spilled material.
3. Spill kit at each fueling station (including magnetic covers and/or flexible berm) will be used to protect storm water inlets in case of a spill.
4. All outdoor storage tanks are double-walled.
5. All indoor tanks are double-walled.

3.2.4 Inspections and Records - 40 CFR 112.7(e)

Inspections of oil facilities will be conducted regularly once per week. Records of these inspections will be maintained on file for the period of 3 years. Appendix D contains a sample inspection log. The Environmental Advisor is responsible for providing blank inspection forms to the Maintenance Supervisor/Bridge Director at each bridge and checking that weekly inspections are completed and recorded.

DRPA conducts weekly Waste Container Inspections at the Betsy Ross Bridge maintenance facility. A copy of the Waste Containers Inspection Checklist is attached to this plan in Appendix D. This procedure should be followed at all of the bridge maintenance facilities.

3.2.5 Personnel Training - 40 CFR 112.7(f)

All oil and fuel-handling personnel will be trained in the operation and maintenance of equipment to prevent discharges, discharge procedure protocols, applicable laws, rules and regulations, and the contents of this plan within one month of employment. Refresher briefings will be provided annually, or as follow-up to incidents. These briefings will highlight and describe known spill events, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharges of oil and hazardous materials and applicable pollution control laws, rules, and regulations. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility. A record of attendance at these briefings will be kept using the form presented in Appendix C.

3.2.6 Security - 40 CFR 112.7(g)

Some areas designated for handling and storing oil are located indoors and are locked when unattended. Outdoor tanks and fueling islands are located in close proximity to the maintenance shops. There is police presence at these facilities 24-hours a day, seven days a week. Master flow valves are locked in the closed position with keys controlled by the foreman. Starter controls on all pumps are locked in "off" position when not in operation. Loading/unloading connection are securely capped or flanged. Facilities are provided with appropriate lighting that assists with both discovery of discharges and preventing of vandalism during hours of darkness.

3.2.7 Tank Truck Unloading - 40 CFR 112.7(h)

Each bridge facility receives regular deliveries of fuel from a contractor. Truck drivers are trained in the handling of fuel oil. Drivers are present at all times during fuel delivery. If the delivery hose should become disconnected during the unloading operation, the drivers are instructed to activate an emergency shut down switch on the truck.

All fuel and oil delivery companies contracted to deliver fuel and oil to DRPA facilities will be informed in writing of the requirements to:

1. Use only drivers trained in the handling of fuel oil,
2. Have drivers present at all times during fuel deliveries,

3. Have a working emergency shut down switch on the delivery vehicle, and
4. Have oil absorbent spill pads and socks on the truck.

The Environmental Advisor has responsibility that each new fuel oil delivery company is informed in writing of these requirements.

3.2.8 Facility Drainage - 40 CFR 112.8(B)

Benjamin Franklin Bridge

The Benjamin Franklin Bridge consists of a span suspended between two stone towers and then anchored sections that bring the deck down to street level. Storm water runoff from the suspended span drains to scuppers on the towers that outlet directly to the Delaware River. On the New Jersey side, all storm water runoff from east of the tower to Delaware Avenue flows to the Camden City Storm Sewer system that may discharge directly to the river. To the east of Delaware Avenue, storm water discharges to the municipal combined sewer system. All drainage from maintenance facility flows to the Camden County Municipal Utilities Authority (CCMUA) Delaware No. 1 Water Pollution Control Facility (WPCF). The maintenance facilities, fueling area and toll plaza drain to the combined sewer system. Only portions of the bridge deck located west of Delaware Avenue in Camden and east of Columbus Blvd. in Philadelphia drain to a separate storm sewer system. Figure A-1 in Appendix A, shows the Benjamin Franklin Bridge, its maintenance facilities, and the boundaries between areas draining to combined sewers and areas draining separate storm water collection systems.

Storm water that falls from Delaware Avenue and west on the Pennsylvania side drains to the Philadelphia City combined sewer system. The DRPA has no pre-treatment agreements or other permits for discharges to combined systems from the Benjamin Franklin Bridge facilities.

Betsy Ross Bridge

Storm water runoff from the bridge deck flows to inlets that discharge directly to the Delaware River. During the construction of the maintenance facility and parking lot on the New Jersey Side, the Pochach Creek was diverted into a culvert that runs under the lot. Storm water runoff from the toll plaza and the parking areas surrounding the office building flow to inlets that discharge directly to Pochach Creek. On the Pennsylvania side, the bridge access ramps traverse and discharge storm water runoff to Frankford Creek. Figure A-2 in Appendix A presents an overall site map of the Betsy Ross Bridge and its maintenance facilities and shows the boundaries between areas draining to combined sewers and areas draining to separate storm water collection systems.

Commodore Barry Bridge

Storm water runoff from the bridge deck flows to inlets that discharge directly to the Delaware River. Storm water runoff from the toll plaza and the parking areas surrounding the office building, materials storage and fueling areas flow to inlets that discharge directly to Raccoon Creek. See Figure A-4 in Appendix A for the outfall locations. Storm water runoff on the Pennsylvania side flows into a collection system that discharges to the Delaware River.

Walt Whitman Bridge

Inlets collecting storm water runoff from the bridge deck discharge directly to the Delaware River. Storm water runoff from the maintenance building parking area and inland portions of the bridge on the Pennsylvania side discharge to the City of Philadelphia combined sewer system. Figure A-3 in Appendix A presents an overall site map of the Walt Whitman Bridge and its maintenance facilities and shows the boundaries between areas draining to combined sewers and areas draining to separate storm water collection systems.

3.2.9 Bulk Storage Containers - 40 CFR 112.8(b)

The aboveground storage tanks (ASTs) at Benjamin Franklin, Betsy Ross, and Commodore Barry facilities were installed in 2020. The tanks are double-walled steel construction, with outer wall covered with concrete. These tanks are all registered with the NJDEP.

The dual compartment aboveground storage tank (AST) at the Walt Whitman Bridge maintenance facility was installed in 1993. The tank is double-walled steel construction, with outer wall covered with concrete. Three additional aboveground storage tanks contain diesel fuel for emergency generators. The maintenance generator located at the rear of the maintenance yard is a 2,400-gallon tank double-walled steel construction and inside the New Jersey anchorage is a 380 -gallon tank is constructed of double-walled steel. All of the ASTs at the facility are registered with PADEP under number 51-45258.

Indoor tanks for storage of motor oil and waste oil were installed at each facility in 2002 to replace the old system of storage in 55-gallon drums. These tanks are double-walled steel construction.

3.2.10 Transfer Operations, Pumping and Facility Process- 40 CFR 112.8(d)

All new buried piping will be protected by wrapping and coating. Cathodic protection will also be employed. All exposed piping is inspected once a month for signs of corrosion and deterioration. All pipe supports, valves, and joints are also examined once per month for signs of wear.

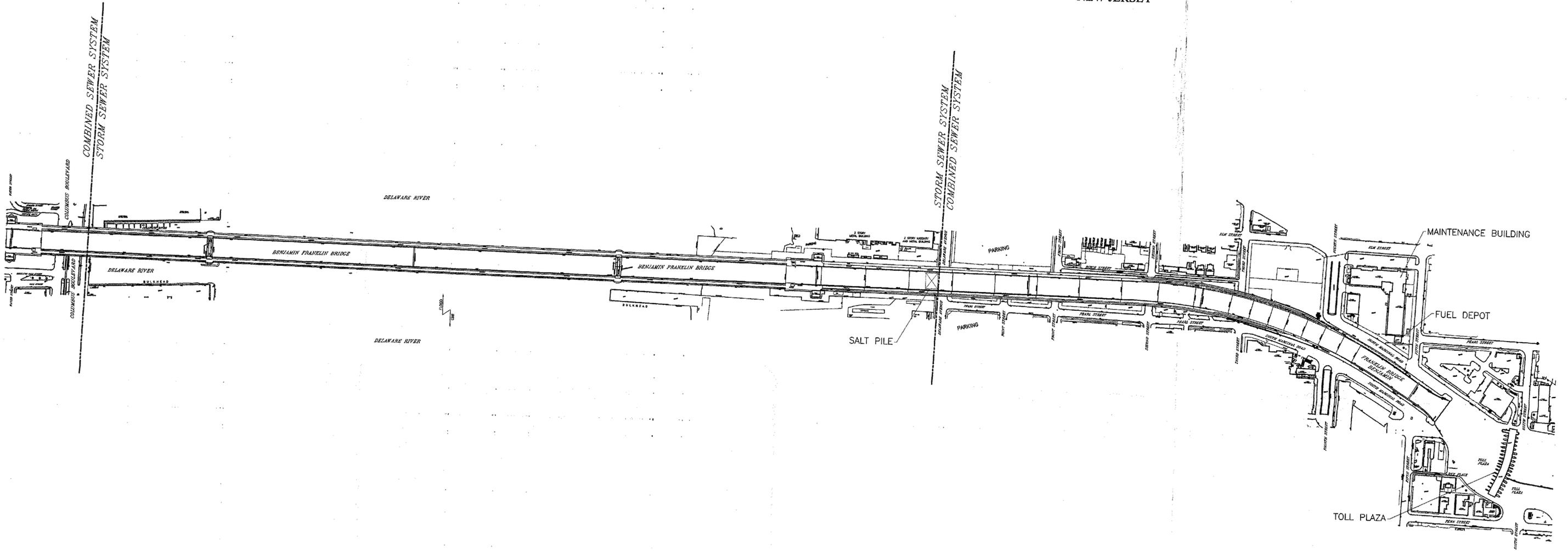
Fueling areas and fuel pumps are inspected once per week. Drivers are instructed to stay with their vehicle during fueling. A spill kit containing magnetic covers and flexible spill berms is located at each island.

APPENDIX A

SEPARATE STORM AND COMBINED SEWER SYSTEM BOUNDARIES

PENNSYLVANIA

NEW JERSEY



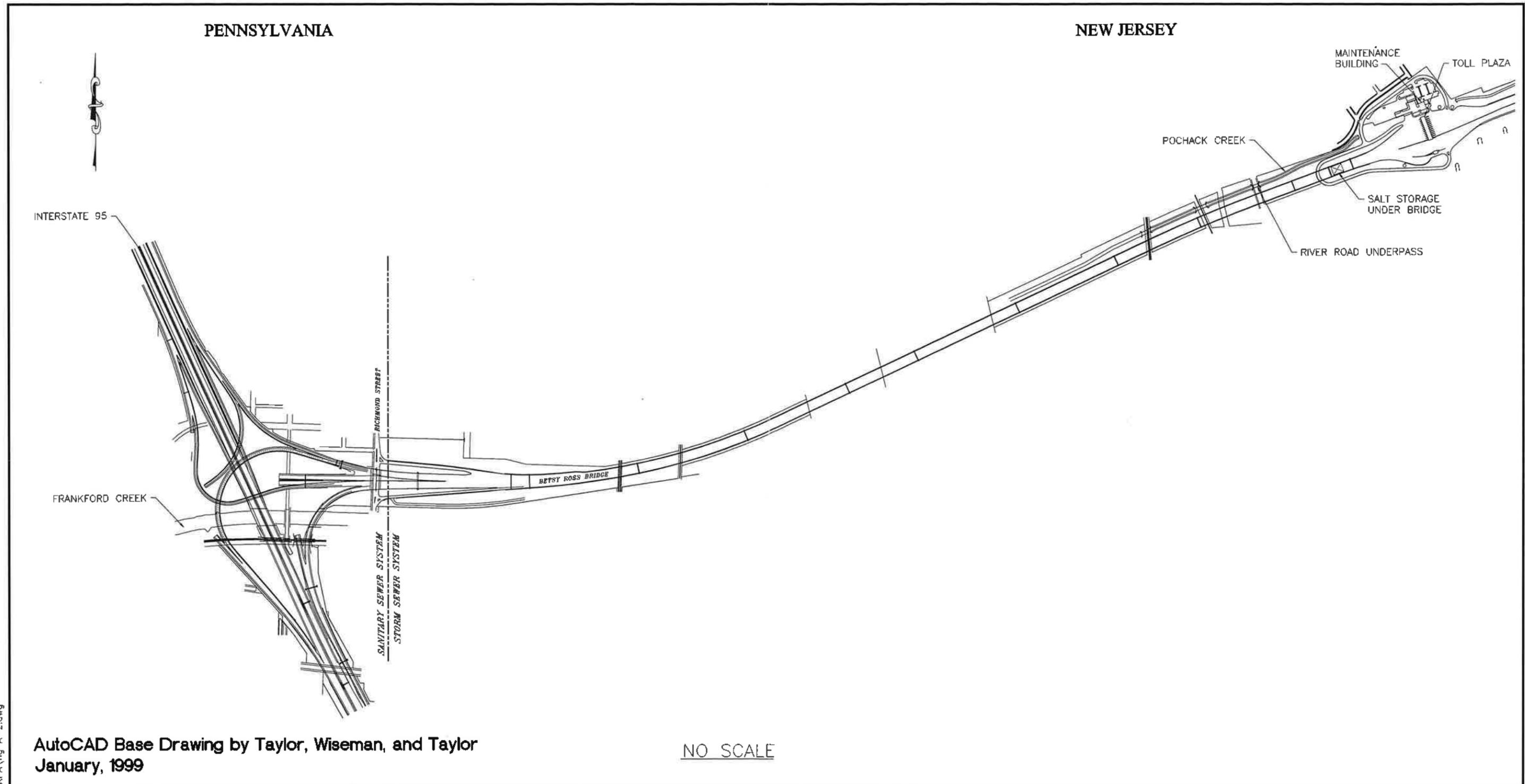
AutoCAD Base Drawing by Taylor, Wiseman, and Taylor
January, 1999

Delaware River Port Authority

Revised Draft Compliance Evaluation Report
NPDES Phase II Storm Water Regulations



FIGURE A-1
Benjamin Franklin Bridge
Sewered Areas Boundaries



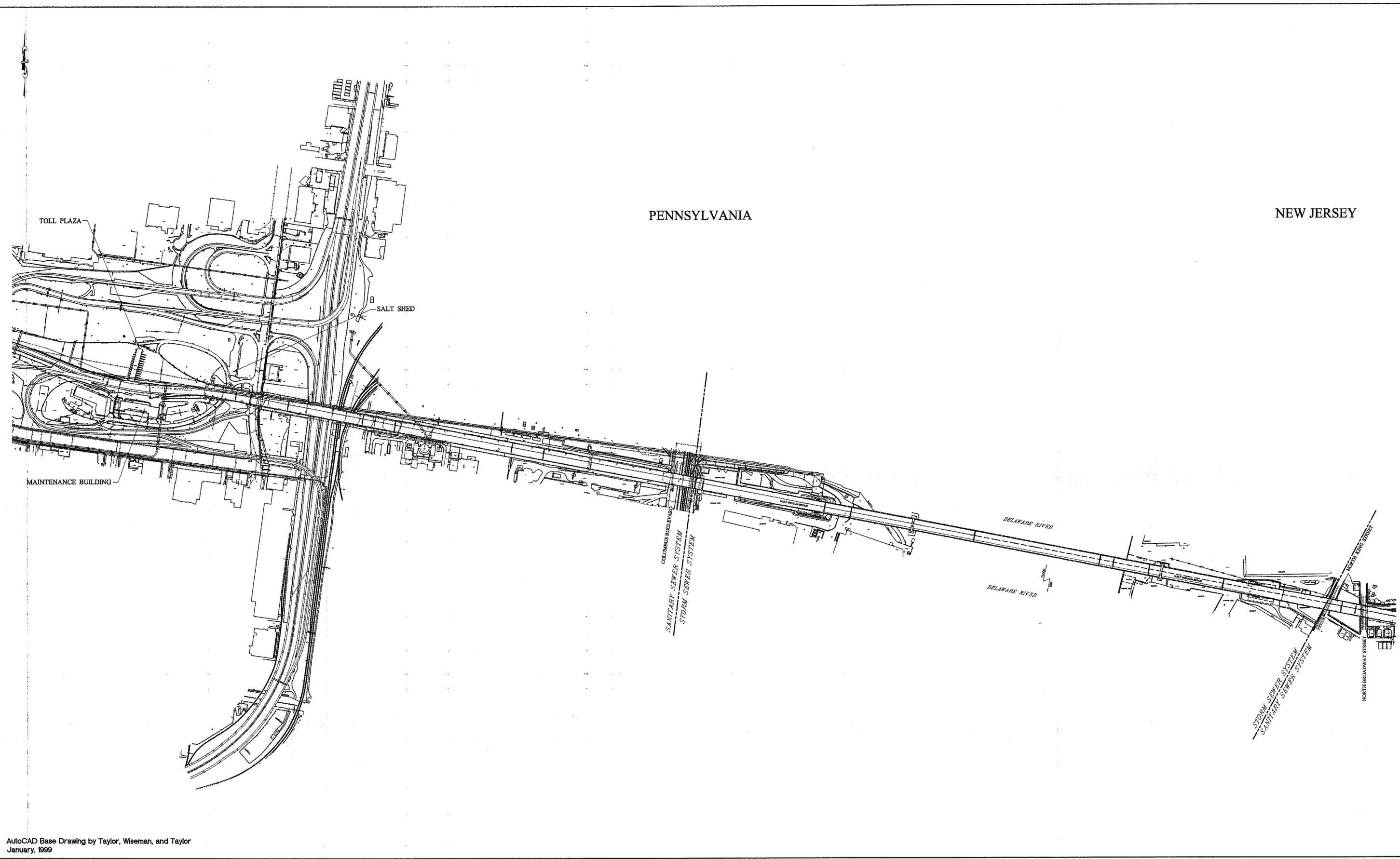
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Delaware River Port Authority

Revised Draft Compliance Evaluation Report
NPDES Phase II Storm Water Regulations



FIGURE A-2
Betsy Ross Bridge
Sewered Areas Boundaries



AutoCAD Base Drawing by Taylor, Wiseman, and Taylor
 January, 1999

G:\ACADPROJ\1013004001 DRPA\fig 5-4.dwg

Delaware River Port Authority
 Revised Draft Compliance Evaluation Report
 NPDES Phase II Storm Water Regulations



FIGURE A-3
 Walt Whitman Bridge
 Sewered Areas Boundaries

APPENDIX B
SUBSTANTIAL HARM DETERMINATION FORM; SPCC TEAM MEMBERS; PLAN
REVIEW FORM

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

40 CFR 112 APPENDIX C

Facility Name: DRPA bridge facilities (Benjamin Franklin, Betsy Ross, Commodore Barry, and Walt Whitman)

Owner Address: One Port Center, 2 Riverside Drive, P.O. Box 1949, Camden, NJ 08101-1949

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 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 such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

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 such that a discharge from the facility would shut down a public drinking water intake?

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 latest 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.

Signature

John T. Hanson

Name (printed or typed)

Chief Executive Officer

Title

Date

POLLUTION PREVENTION TEAM MEMBERS

Title	Name (if available)	Responsibility	Phone Number
DRPA COO	Robert P. Hicks	Reviewing, Approving, and Authorizing Corporate Resources for Prevention of Oil Spills and Storm Water Pollution	
DRPA Environmental Advisor	Steve Reiners	Implementing the Program to Prevent Oil Spills and Storm Water Pollution	856-968-3340
Maintenance Supervisor		Performing Routine Inspections of the Facility to Detect Oil Spills and Storm Water Pollution, Initiating Response to Oil Spills and Storm Water Pollution	
<i>BFB</i>	Joe McAroy		856-317-5906
<i>BRB</i>	Joe McAroy		856-317-5906
<i>CBB</i>	Ricardo DeOliveira		215-218-3721
<i>WWB</i>	Ricardo DeOliveira		215-218-3721
Police Dispatch		Initiating Response to Oil Spills and Storm Water Pollution, Coordinating Immediate Response to Oil Spills and Storm Water Pollution	
<i>BFB</i>			856-968-3301
<i>BRB</i>			856-317-5901
<i>CBB</i>			856-241-4801
<i>WWB</i>			215-218-3701

APPENDIX C

EMPLOYEE TRAINING MATERIALS

Appendix C contains Standard Operating Procedures for implementation at all DRPA maintenance facilities. These sheets should be posted inside of all facilities and also distributed to all new employees during orientation and training.

EMERGENCY NOTIFICATION GUIDELINES

PURPOSE

To set forth the procedure for requesting emergency assistance and the notification of DRPA personnel. Each site should review and modify these procedures, where appropriate, to conform to site-specific conditions/requirements.

GENERAL PROCEDURE

A. Criteria for Notification

1. This procedure is in effect for serious incidents occurring at any DRPA facility.
2. Requests for emergency assistance will be made:
 - a. Anytime outside emergency assistance is needed, to include but not limited to:
 - Law Enforcement
 - Fire Department
 - Rescue
 - Emergency Medical Services
 - b. In the event of fire or explosion or serious possibility of same.
 - c. For any incident where the safety or welfare of employees is threatened.
 - d. For any condition which poses a threat to the facility.
3. Notification of the Dispatcher will be made:
 - a. Anytime emergency assistance is requested.
 - b. For traffic accidents
 - c. For any malfunction of systems that creates:
 - Possibility of spill, fire, or explosion
 - Security vulnerability.
 - Lack of capability to monitor fire, sprinkler water flow, etc.
 - d. For every serious incident involving employee misconduct.
 - e. For any situation that in the judgment of the reporting person dictates that management be made aware of the circumstances.

- #### B. The Dispatch Room is the designated location for the receipt of major emergencies, alarms, and important messages for all DRPA facilities. Dispatchers shall receive and disseminate these messages as accurately and quickly as possible. At no time shall a coordinator ask a caller to call another

telephone number to report an emergency. All DRPA facilities have been instructed to call the Dispatch to report emergencies and problems on site.

C. Recording Information

In the event that information (Emergency, Alarm, Message, etc.) is received at the Dispatch, the Coordinator shall obtain the following:

1. Callers name, operator number, etc.
2. Facility or agency they are calling from.
3. Their telephone number
4. The message
 - What is occurring
 - Where is it occurring
 - What has been done
 - Who has been notified

The Dispatcher shall make a written record of the telephone call including time, date and message.

The Dispatcher shall immediately begin the notification procedure according to the attached to this procedure.

D. Management Notification Procedure

The management notification procedure is composed of the following notification schedule, management telephone listings, and emergency telephone numbers.

EMERGENCY TELEPHONE NUMBERS

Title	Name	Situation	Phone Number
Police Dispatch		Major emergency, including highway incidents	911
<i>BFB</i>			856-968-3301
<i>BRB</i>			856-317-5901
<i>CBB</i>			856-241-4801
<i>WWB</i>			215-218-3701
DRPA COO	Robert P. Hicks	Immediately in major emergency, after the fact for minor incidents	
Environmental Advisor	Steve Reiners	Same as above	856-968-3340
Maintenance Supervisor		Incidents involving maintenance facilities	
<i>BFB</i>	Joe McArroy		856-317-5906
<i>BRB</i>	Joe McArroy		856-317-5906
<i>CBB</i>	Ricardo DeOliveira		215-218-3721
<i>WWB</i>	Ricardo DeOliveira		215-218-3721
National Response Center		Releases covered under 40 CFR 110, causing a sheen or discoloration of the water surface or adjoining shorelines All releases of hazardous substances over CERCLA RQs.	800-424-8802
NJDEP		Same as above	800-541-2050 or 609-292-7172
PADEP		Same as above	877-WARNDEP (877-927-6337)
DRPA Environmental Contractor	ACV Enviro	Spills and leaks that need contractor's involvement and proper disposal of contaminated material.	800-777-4557

DRPA STANDARD OPERATING PROCEDURES

Vehicle Maintenance

1. Perform all vehicle maintenance inside the shop.
2. Inspect vehicles entering the shop for leaking fluids. If leaks are observed, place drip pan under the vehicle.
3. Cover floor drains when changing or maintaining vehicle fluids.
4. If fluid spill or leak occurs, clean up spilled material with absorbent materials and place spent materials in disposal drum.
5. Inspect all vehicles once per week for leaking oil and fluids.
6. Inspect disposal drum once per week and notify the maintenance supervisor when it is time for a pick up.
7. Place a drip pan underneath vehicles and equipment when performing maintenance such as removing parts, unscrewing filters, or unclipping hoses. Promptly transfer the used fluids to the proper waste or recycling drums. Open containers, including full drip pans, will not be left on the shop floor.
8. When wrecked vehicles arrive at the facility for storage, drain and collect all engine and transmission fluids. If the vehicles were drained prior to arrival at the site, place drip pans under them immediately to contain leakage since oils and other fluids may drip for several days. Dispose or recycle all fluids appropriately. Cover wrecked vehicles with a secured tarp to prevent contact with precipitation.

DRPA STANDARD OPERATING PROCEDURES

Vehicle Fueling

1. Drivers must remain with their vehicles while fueling.
2. Do not top off fuel tank.
3. In the event of a small spill, apply absorbent material to the spill. Absorbent materials are located in the small building on each fuel island. Dispose of all spent absorbent material in the DOT Drums located inside the maintenance facility.
4. Inspect all vehicles at least once per week for evidence of leaking fluids.
5. In the event of a spill that exceeds five (5) gallons, protect the storm water inlet with absorbent “Pig” mats or socks and call the emergency dispatch at once for a patrol car to respond. Characterize the spill for the dispatcher. If practical, protect the storm water inlet with a magnetized vinyl mat and apply socks and booms to the spill to contain the

DRPA STANDARD OPERATING PROCEDURES

Fuel/Oil Vendors

The following procedures shall be followed by all fuel delivery vendors:

1. Vendors must stay with their trucks during fuel transfer.
2. Before beginning fuel transfer, cover all storm water inlets within 100 feet of the fill connection with magnetic storm drain covers. The magnetic storm drain cover is located in the small building at each fuel depot.
3. In the event of a small spill, apply absorbent material to the spill. Absorbent materials are located in the small building on each fuel island. Dispose of all spent absorbent material in the DOT Drums located inside the maintenance facility and notify DRPA personnel to replenish the absorbent materials.
4. In the event of a spill that exceeds five (5) gallons, notify personnel in the maintenance shop to immediately call the emergency dispatch for assistance in controlling the spill. Characterize the spill for the dispatcher. Apply socks and booms to the spill to contain the flow.

DRPA STANDARD OPERATING PROCEDURES

Materials Handling and Facility Inspections

Keep all materials stored in closed and labeled containers. Waste materials should never be mixed.

All waste containers should be checked weekly for condition and labeling.

All fuel tanks, fueling areas and fuel pumps will be inspected once per week. Any evidence of leaks will be reported to the maintenance supervisor.

Exposed piping shall be inspected once per month for signs of corrosion and deterioration. All pipe supports, valves and joints will be inspected once per month for signs of wear.

Roadway Maintenance

All street sweeping routes and dates will be recorded.

Catch basins will be cleaned at least twice per year, once in the spring to remove sediment and trash, and once in late November or early December after the leaves have fallen.

Employ wise salting practices. Keep spreaders calibrated to minimize the amount of material necessary to safely de-ice roadways.

Heavily salted snow should not be disposed of in the river.

APPENDIX D
FACILITY INSPECTION FORMS

Waste Containers Inspection Checklist

Where applicable answer Y for yes and N for no

Bridge -					
Storage location-	Daily Inspection Dates				
Waste Type:					
Is container marked:					
Hazardous Waste:					
Date accumulation started:					
Date any material was added:					
How much material was added:					
Are containers in good condition, check for:					
Leakage					
Spills					
Rust					
Damage					
Bulges					
Are storage containers closed?					
Is waste compatible with containers?					
Are incompatible waste kept apart?					
Is there sufficient aisle space					
Number of containers in storage?					
Are labels visible?					
Are labels legible?					
Time the inspection was completed:					
Inspector's Name:	Initials				

COMMENTS:



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