

**SJOMAN GROUP, Inc.**  
**dba KEY ALLEGRO MARINA**

**Stormwater Pollution Prevention Plan**

**Facility Emergency Response Plan**

## **Plan Overview**

The purpose of this plan is to document the emergency response procedures of Key Allegro Marina in order to outline the stormwater pollution prevention measures that have been employed; including the strategies that would be taken by the operators of the facility in the event of a spill in order to control and contain the situation. This plan is written in accordance with General permit No. 01MA for Discharges From Marinas (effective December 21, 2001).

**Sjoman Group, Inc  
dba Key Allegro Marina**

**37 Mazatlan Drive  
Rockport, Texas 78382**

**Facility Latitude: 28 deg 02.589min N  
Facility Longitude: 97deg 01.878min W**

**Phone: (361) 729-8264  
Fax: (361) 729-8265**

**Contact: John Nelson, President**

## **Element 1 – Pollution Prevention Team**

Team Leader:

John M. Nelson – President

Key Allegro Marina  
37 Mazatlan Drive  
Rockport, Texas 78382

Phone: (361) 729-8264  
Cell: (832) 465-6730

The team leader is responsible for directing all activities relating to the identification, control and cleanup of all pollution situations that may have a detrimental effect to the environment, including the assignment of specific tasks to individual team members.

## **Element 1: Pollution Prevention team cont.**

Team Members:

Larie Nelson – Vice President

Phone: (361) 729-8264

Cell: (832) 465-8370

Team members are responsible to carry out all tasks relating to a pollution/spill situation as assigned by the Team Leader. Additionally, to assume the responsibilities of the Team Leader in the event of his absence from the scene or in the event that the Team Leader is unable to carry out the required tasks.

Other team members will include all full or part time employees of the facility.

## **Element 2 – Description Of Potential Pollution Sources**

### **Facility Storage Inventory**

Bulk storage at the Facility is provided in a single area located on Mazatlan Drive.

Tank Description: The fuel storage system consists of a single, dual wall steel/concrete above ground tank. The tank is an 8,000 gallon two compartment vessel containing a maximum capacity of 5,000 gallons red-dyed diesel and 3,000 gallons unleaded gasoline.

Flowline Description: Line 1 – Diesel, 2-inch fiberglass/dual wall plastic  
Line 2 – Gas, 1 ½ inch fiberglass/dual wall plastic

Maximum vessel serviced: 2,000 gallons

No other hazardous materials are stored in any significant quantity at this facility.

### **Element 3 – Site Map**

Key Allegro Marina is located on Key Allegro Island in the City of Rockport, Aransas County, Texas. The facility is surrounded by a naturally occurring salt water bay, Little Bay, and sheltered man made canals and structures. Little Bay is surrounded by mixed sand and gravel beaches and sheltered wetlands and is classified by the Texas General Land Office (GLO) as a medium priority waterway. Immediately adjacent to Key Allegro Island is Aransas Bay a large open saltwater bay.

Indigenous to the area are various wildlife species including bird, waterfowl and fish.

Figure 1 - Survey of Key Allegro Marina property located at 37 Mazatlan Drive.

Figure 2 – Schematic of Stormwater flow patterns at Key Allegro Marina facility.

#### **Element 4 – Inventory of Exposed Materials**

No materials or potential pollutants are stored at Key Allegro Marina in open containers or areas that could be affected by precipitation.

#### **Element 5 – Significant Spills and Leaks**

No known spills have occurred at the Facility after the transfer of the marina to Sjoman Group, Inc. (February 2005).

#### **Element 6 – Sampling Data**

No sampling is conducted at this Facility in that no fluids are discharged to state waters from the operations conducted at Key Allegro Marina.

#### **Element 7 – Risk Identification**

In the event of a spill, the response objectives are to prevent personal injury, protect public and private property, and to protect the environment by onsite spill containment. Facility employees will be used to minimize both the potential for injury and the migration of spilled materials offsite. For any spill event beyond the capacity of Facility personnel to contain, the following response/regulatory authorities will be contacted:

- City of Rockport Fire Department Hazardous Material Unit
- Miller Environmental Services (Rapid Response)
- Local Authorities (dial 911)
- Other required regulatory contacts

##### **7.1 Drainage Control**

Stormwater drainage at the Facility is directed by the asphalt/concrete parking areas to concrete lined drainage ditches or drainage pipes to the waterfront. A large spill at the fuel storage area could allow fuel to flow freely towards and eventually reach the waterfront (Little Bay) if not contained. For the case where a spill at the Facility poses a threat to Little Bay, facility personnel will perform initial containment using booms and absorbent pads. If required, other response/regulatory agencies will be contacted to assist with cleanup.

## **Element 7 – Risk Identification cont.**

### **7.2 Fuel Storage Area**

The fuel storage area contains a single 8000-gallon above ground storage tank (AST), which has two separate compartments for storage of 3000 gallons of unleaded gasoline and 5000 gallons of red dyed diesel. The location of the fuel storage area is illustrated in Section 3, Figure 2. Each compartment is equipped with the necessary vents, level controls and overspill protection.

This compartmentalized AST is a double walled welded steel constructed tank manufactured in accordance with API standards and is UL certified. The AST is also equipped with a Fireguard (outer wall) tank, which provides 8,800-gallons capacity of secondary containment, which is sufficient to contain 100% of the volume of the inner tank plus 10%. The double walled construction of the AST meets all of the current state and federal regulations pertaining to secondary containment.

All materials of construction, including fill and product lines, as well as gaskets and fittings, are chemically compatible with long-term contact with gasoline and diesel products, photos 1 – 5. In addition, the aboveground piping and the fill area are protected from potential vehicular damage by bollards.

### **7.3 Fuel Dispensers**

The gasoline and diesel fuel dispensers are located on the fuel dock approximately 350 feet from the AST over the water. Plastic collection pans located under the dock beneath each of the fuel nozzles will contain any small leakage from the pumps and filters. All dispensers are shut off when not in use. The fuel-delivery nozzles are equipped with overfill pressure shut-off triggers to prevent overfilling of vessels. In addition, all dispenser nozzles flow levers must be manually depressed to operate (the flow control lever continuous flow stops have been removed; refer to photo no. 6).

For the case that a marine vessel leaves the dock without removing the fueling nozzle from its tank, the flexible hose will break away from the dispenser, engaging the excess flow valve (shear valve), photo no. 7, to close, which would limit the volume of product discharged to a maximum of one to four gallons. Additionally, an emergency shut off switch located in the Ships Store, photo no. 8, could be used to cut off flow to the dispenser. Facility personnel would immediately address any release that might occur as a result of the above. The Facility Spill Response Kit, photos no. 9 and 10, which contains spill abatement equipment (booms, pads, etc.) is strategically located on the gas dock near the gas and diesel fueling operations.

## **Element 7 – Risk Identification cont.**

### **7.4 Vessel Fueling**

Fueling of the vessels will only be conducted by the vessel's owner or designated representative. Facility personnel will be on site to assist as required in the event of a spill situation. Photo no. 11 shows the fuel dispenser tool box, which in addition to providing funnels and various nozzles, has a variety of absorbent and clean up materials to clean up any small miscellaneous drips or splashes that may occur during normal fueling operations.

### **7.5 Bulk Fuel Delivery**

Bulk fuel delivery transports must conform to unloading procedures outlined in Title 49 CFR Parts 171, 173, 174, 177, and 179 established by the United States department of transportation (US DOT). These regulations provide for the prevention and control of spills in connection with the delivery of bulk fuel to the Facility.

As a matter of policy, bulk fuel transfers at the Facility will be limited to 4,950 gallons and 2,590 gallons per delivery for diesel and gasoline to their compartments, respectively. A liquid level gauge will be monitored visually during bulk fuel deliveries to prevent tank overflow. No bulk fuel transfer operations will be performed during heavy rainfall events to minimize the possibility of a spill being carried offsite with storm water runoff.

The tank truck fuel unloading area is located in a swale leading to a drain, photos no. 12 and 13. As part of the fuel spill containment precautions, a rubber mat located adjacent to the fill line connection boxes, photo no. 3, will be placed over the stormwater drain to block the opening during off loading operations.

A spill from the fuel delivery trucks in the unloading area would be held in the fuel fill containment area, before potentially overflowing to the storm water drainage ditch potentially leading to the waterfront. Facility personnel will monitor all tank truck un-loadings, and respond accordingly. For the case of a non-controllable spill, the Team leader will be notified and response procedures will be put into effect immediately.

## **Element 8 – Measures and Controls**

Regular monthly inspections of the bulk storage areas and related equipment shall be conducted for detection of leaks, structural or mechanical deterioration, damage, and equipment malfunctions. The Facility SWPPP Team Leader is responsible for conducting the inspections and implementing appropriate corrective action in the event a deficiency is noted. In addition, any potential release situations noticed by Facility personnel during day-to-day operations shall be immediately reported to the SWPPP Team Leader.

Each weekday a brief visual inspection of the bulk storage areas shall be conducted to ensure that there are no obvious signs of spills, or impending equipment failure. The following items are to be addressed:

- Bulk Fuel Storage Area and Fuel Dispensing Areas are to be inspected to identify evidence of leakage around gaskets, rivets, welds, and other points of weakness.
- The exterior of each tank is to be inspected for signs of corrosion, rust, or other signs of possible structural failure.
- The oil-water separators are to be inspected for signs of accumulated product and rainwater, and to ensure that the oil-water separator is cleaned out on a regular basis.
- Tank gauges are in place and the level of fuel is noted.
- The Vapor Alarm system is noted to be operating, and fuel levels are compared with those noted on the tank gauges.
- The Fuel Dispenser Area is inspected for signs of equipment damage or spills, and the flexible hose is inspected for signs of kinks, tears, twists or sharp bends.
- The Maintenance Shop Area is inspected for spills, signs of container failure, and leaks.

On a monthly basis, a comprehensive inspection of all the bulk storage areas shall be conducted. Inspection checklists shall be completed during the monthly inspection and maintained on file with the Facility Environmental Plans. The SWPPP Team Leader will address and deficiencies noted during the inspection.

## **Element 8 – Measures and Controls cont.**

### **General Response procedures:**

- 1) Ensure that all personnel are safe
- 2) Identify source
- 3) Control source
- 4) Implement complete control measures
- 5) Contain the discharge to the immediate area
- 6) Notification to proper authorities
- 7) Implement collection of spill
- 8) Evaluate occurrence

In order to minimize the potential environmental impact of a spill, immediate measures will be taken through the use of absorbent pads, absorbent pillows and booms to contain the spill to the immediate area of the discharge. By containing the spill to the immediate area of the marina facility, the potential for negative environmental effects will be minimized due to the location of the marina with respect to local wetlands and due to the use of full concrete bulk heading throughout the facility.

The primary containment will occur through the use of booms placed in a suitable manner to surround the spill and prevent its movement. By observing the wind direction and tides, the booms are to be adjusted in order to maintain control of the spill. Absorbent pads and pillows will be utilized to pick up and remove the spill from the controlled area. The contaminated absorbent materials will then be placed and stored in a suitable container to provide for proper disposal and prevent further contamination of the surrounding areas.

This methodology for containment is adequate for this facility due to the nature of a potential spill situation and the relative maximum size/quantity of the spill.

Once the spill is controlled and contained, the proper authorities are to be notified:

|  |                     |
|--|---------------------|
| <b>Texas General Land Office (GLO)</b>       | <b>800-832-8224</b> |
| <b>Nat'l Response Center</b>                 | <b>800-424-8802</b> |
| <b>US Coast Guard - Corpus Christi Group</b> | <b>361-749-5217</b> |
| <b>Miller Environmental Services</b>         | <b>361-289-9800</b> |
| <b>Corrigan Consulting</b>                   | <b>281-922-4766</b> |
| <b>EMS/FIRE</b>                              | <b>911</b>          |

## **Element 9 – Employee Training**

All employees of Key Allegro Marina are instructed in basic emergency procedures as outlined in the Policy Manual, Local Emergency Response Plan and the Spill Response Plan. As part of establishing a proper response to an emergency situation, routine drills are conducted at least on an annual basis in order to insure the proper actions are taken with respect to an emergency situation at the marina facility. Furthermore, employees are instructed as follows with respect to personal actions to be taken in the event of an emergency:

- 1) Instruction as to the location, contents of, and proper deployment of components contained in the Spill Prevention Kit; including but not limited to absorbent pads, booms, and fire extinguishers.
- 2) Employees should keep non-marina personnel clear of the danger and instruct them as to the location of the safe areas.
- 3) Employees are instructed to work within their personal physical capabilities in an emergency situation and to not put their personal well being in jeopardy.
- 4) The proper authorities should be contacted as soon as practical or instruct an alternate individual in attendance to make the proper emergency contacts.

## **Element 10 – Record Keeping and Internal Reporting**

Environmental and Inspection records for Key Allegro Marina are maintained at the marina office located at 37 Mazatlan Drive Rockport, Texas 78382.

## **Element 11 – Sediment and Erosion Control**

Stormwater drainage at the Facility is directed by asphalt/concrete parking areas to concrete lined drainage ditches or drainage pipes on the waterfront. No apparent soil erosion occurs in the unpaved areas of the Facility due to the placement of grass and landscaping to minimize excessive drainage through these areas.

**Element 12 - Annual Comprehensive Site Compliance Evaluation**

A comprehensive Site Compliance Evaluation shall be conducted on at least an annual basis to insure that the description of potential pollutant sources is accurate, the drainage map reflects current conditions, and the pollution control measures are being implemented and are accurate. Appendix A

**Element 13 – Consistency with Other Plans**

The Stormwater Pollution Prevention Plan (SWPPP) for Key Allegro Marina has been prepared to coincide and complement the Oil Spill Prevention and Response Program (OSPRA), the Spill Prevention Control and Countermeasure Plan (SPCC), and the Local Emergency Response Plan with which the Facility operate under.

**Approved by:**

**Signature:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## **Appendix A**