MOUNT
ENGINEERING
Civil and Environmental Consultants

February 11, 2012

Mr. Jay McMann
Island Fuel Inc.
44 Evelyn Way
Vineyard Haven, MA 02568

Subject: SPCC Plan

Dear Jay,

Attached please find the certified SPCC Plan for your Tisbury Island Fuel Facility.

Please complete the process by:

- Signing the Management Approval on page 5
- Signing the Substantial Harm Criteria Checklist in Attachment 7
- Inserting MSDS's of the fuel oil and diesel fuel in Attachment 8

It was a pleasure working with you on this project. Please feel free to contact me should you have any questions concerning this plan, or should you have any SPCC related needs in the future.

Good luck to you with your new facility, and happy heating season!

Sincerely,

Alan F. Mount, P.E.

27 Bayberry Lane • Weymouth, MA 02188
~~PH: (781) 812-1315 • FAX: (781) 812-1316~~
Website: www.mountengineering.com
Email: afmount@mountengineering.com

Spill Prevention Control
And
Countermeasure Plan

(SPCC Plan)

Island Fuel, Inc.

44 Evelyn Way
Tisbury, Massachusetts 02568

February 2012

Prepared by Mount Engineering
Weymouth, MA 02188

Table of Contents

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(SPCC Plan)

For
Island Fuel, Inc.
44 Evelyn Way
Tisbury, MA 02568

Part I

PROFESSIONAL ENGINEER (PE) CERTIFICATION

In accordance with 40 CFR Sec. 112.3(d)

I hereby certify that:

i. I am familiar with the requirements of the SPCC Rules, 40 CFR 112, as amended to be effective on January 14, 2010.
ii. I visited and examined the facility on January 27, 2012.
iii. I have prepared the SPCC Plan in accordance with good engineering practice, including consideration of applicable industry standards with the requirements of the amended SPCC Rule in mind.
iv. Procedures for required inspections and testing have been established and are in practice.
v. This Plan is adequate and satisfies the needs for this facility. Plan implementation is the responsibility of the facility Owner or Operator.

ALAN F. MOUNT
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Date: 2/11/12 Registration No. 39838 State: MA

COMMONWEALTH OF MASSACHUSETTS
ALAN F. MOUNT
CIVIL
No. 38838
REGISTERED
PROFESSIONAL ENGINEER

Affix Stamp Above

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(SPCC Plan)

For
Island Fuel, Inc.
44 Evelyn Way
Tisbury, MA 02568

Part II

5-YEAR REVIEW AND EVALUATION
CERTIFICATION PAGE

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, Island Fuel Inc. will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Review Date: 2/11/12 Signature: _____

Review Date: 2/9/17 Signature: _____

Review Date: 2/8/22 Signature: _____

Review Date: _____ Signature: _____

Review Date: _____ Signature: _____

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(SPCC Plan)

For
Island Fuel, Inc
44 Evelyn Way
Tisbury, MA 02568

Part III

MANAGEMENT APPROVAL

This SPCC Plan has the complete support of the management at Island Fuel, Inc., and will be implemented as herein described. I am at a management level with authority to commit the necessary resources to fully implement this SPCC Plan, such as the manpower, equipment and materials required to expeditiously control and remove any quantity of oil that may be harmful.

Signature: James E McMann
Name: James E McMann "JAY"
Title: president

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(SPCC Plan)

For
Island Fuel, Inc
44 Evelyn Way
Tisbury, MA 02568

Part IV

EMERGENCY CONTACT INFORMATION

Spill Prevention Control Coordinator:

Jay McMann, Facility Co-owner	(Work) 508-696-5959 (Cell) 508-560-3594

Alternates:

Brian McBride, Facility Co-owner	(Cell) 917-402-9432
Carmen Ciminski, Office Manager	(Cell) 801-214-3377

Other Telephone Numbers:

Local Fire Department	911
Environmental Protection Agency Region 1	617-918-1111
MA Department of Environmental Protection	888-304-1133 (24 hr)
National Response Center	800-424-8802
Response Environmental	866-577-5274
Herrygers Environmental	877-547-2748
Martha's Vineyard Hospital	508-693-0410

INFOTRAC 1-800 535-5053
See next page ID 114085

INFOTRAC
THE HAZMAT SOLUTION COMPANY℠

200 North Palmetto St. • Leesburg, Florida 34748
1-352-323-3500

October 26, 2020

ISLAND ENERGY INC
ALAN CIMINSKI
44 EVELYN WAY
TISBURY, MA 02568

Hello Alan,

ISLAND ENERGY, INC is now an authorized user of the emergency response telephone number as required by DOT 49CFR 172.604.

The emergency response telephone number you are authorized to use is **1-800-535-5053**. This number is good throughout North America and may be utilized on Shipping Papers. The contract number associated with your plan is **114085**.
In the coming days you will be receiving shipping papers. You may choose to not use these shipping papers but please ensure the emergency response telephone number appears on the shipping papers you will be utilizing.

If you have any questions or concerns please feel free to reach out to INFOTRAC, 24/7/365, No Exceptions. We are always here to help.

Stay Safe,

Randy B. Lee
www.infotrac.net
Director of Global Marketing & Branding
Official NASCAR Partner & Supplier

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC Plan)

For
Island Fuel, Inc
44 Evelyn Way
Tisbury, MA 02568

Part V

SPPC Plan

112.7 General Requirements for Spill Prevention, Control and Countermeasure Plans

The information contained in this SPCC Plan has been developed in accordance with the "General Requirements for Spill Prevention, Control, and Countermeasure Plans" as described in 40 CFR 112.7 and 112.8 as amended to be effective on January 14, 2010.

112.7(a)(1) Discussion of Facility's Conformance

This Plan has been prepared in accordance with good engineering practices and is subject to the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. The information is presented in the same alpha-numeric sequence as specified in 40 CFR 112.7 and 112.8.

112.7(a)(2) Compliance with Requirements

The Island Fuel Tisbury Massachusetts facility and this SPCC Plan comply with all applicable requirements of this part.

112.7(a)(3) Facility Description

Name & Location:

Island Fuel, Inc.
44 Evelyn Way
Tisbury, MA 02568

Island Fuel is a full service provider of heating oil to homes and businesses through out Martha's Vineyard in addition to providing direct fleet diesel fueling services.

Located at 44 Evelyn Way in the town of Tisbury, MA, Island Fuel has recently completed the installation of a new 9980-gallon split compartment storage tank for the bulk storage of #2 Fuel Oil and Diesel Fuel. There is a 275-gallon Roth double wall heating oil tank behind the office building that holds heating oil for the office. There are no mobile or portable oil storage containers and no underground storage tanks at this facility. The 1/3 acre facility is owned by Island Fuel, and is bordered to North by Parcel 22-C-7 (owned by Abigail Bailey Limited), to the East by Parcel 22-C-5.1 (owned by Island Fuel), and to the South by Parcel 22-C-7.2 (owned by Raymond Bilodeau Jr.).

The nearest bodies of water to the facility are Rhoda Pond to the West and Lagoon Pond to the East, which are both connected to Vineyard Sound. Due to the location of the facility on an island and it's proximity to the navigable waters described above, Island Fuel is required to prepare and implement a Spill Prevention , Control and Countermeasure Plan.

A Facility Site Plan is included as Figure 1, showing the location of the single aboveground storage tank, the 275- gallon heating oil tank, the fuel loading and unloading area, containment pad and existing structures.

Operations at Island Fuel consist of receiving bulk tanker deliveries of #2 fuel oil and diesel fuel into the split compartment storage tank, and then loading these fuels into delivery tank trucks for local distribution to customers on the island. All transfer operations take place at the loading/unloading area which itself is located within the 4,300 gallon containment dike.

112.7(a)(3)(i) **Types of Oil & Storage Capacity**

There is one fixed bulk container and one 275-gallon heating oil tank at this facility that fall under the SPCC regulations. The aboveground storage tank is a two compartment 9,980 gallon Highland Fireguard tank that holds a maximum of 5,000 of #2 fuel oil and 4,980 gallons of diesel fuel. The 275-gallon Roth tank is located behind the Island Fuel office building. The location of both tanks is shown on the Facility Site Plan, included as Figure 1. There are no mobile or portable oil storage containers in use at this facility.

112.7(a)(3)(ii) **Discharge Prevention Measures**

Discharges at the facility are prevented by adherence to a combination of periodic visual inspection procedures, employee training on oil handling and associated equipment, and strict following of Island Fuel's Fuel Loading/Unloading Procedure, included as Attachment 2.

Inspection Procedures- Periodic facility inspections include visual observations of the storage tanks, piping, secondary containment and loading/unloading areas. Inspection documentation is maintained in a separate file and retained for three years. Visible oil leaks from tank seams, gaskets, rivets and bolts causing a visible stain and/or an accumulation of oil are repaired immediately. The Inspection Form is included as Attachment 4.

Employee Training- Each employee is responsible for recognizing the potential for an occurrence of any spill and for calling this to the attention of appropriate personnel. Depending on the situation, appropriate personnel at the facility are maintenance employees, supervisors, or the Spill Prevention Control Coordinator. The training of oil-handling employees will address the following topics:

- The operation and maintenance of equipment to prevent discharges;
- Discharge procedure protocols (including spill communication procedures)
- Applicable pollution control laws, rules and regulations
- General facility operations; and
- The contents of the SPCC Plan.

Personnel receiving training at the facility include maintenance and operational personnel that are involved in activities involving oil storage, operating equipment using oil, oil transfer operations, and emergency response/spill coordination. All employee training is documented on a Training Record, sample included as Attachment 5.

Fuel Loading/Unloading Procedure – Please refer to Attachment #2.

112.7(a)(3)(iii) **Drainage/ Discharge Controls**

The loading/unloading area and the adjacent bulk storage tank are both within a concrete containment pad that provides 4,300 gallons of containment volume.

The facility receives bulk deliveries via multiple compartment tanker trucks with the largest compartment being 2650 gallon (typically) and loads into delivery trucks with the largest compartment volume of 1000 gallons. Considering the largest volume of a single compartment typically in use at this facility being 2650 gallons, and the unlikelihood of a tanker failure involving more than a single tank truck compartment, the containment volume provided by the loading/unloading pad of 4,300 gallons is adequate for this facility. The facilities use of the Scully system and the spill and overfill protection it provides makes a release in excess of the containment capacity very unlikely.

The containment pad has a 4” drain pipe and valve at the North East corner of the pad that is normally closed. This valve allows accumulated precipitation and snow melt that is contained by the pad to be drained -after inspection- onto the ground adjacent to the containment pad.

The Highland Fireguard tank is a double-wall tank design that provides secondary containment for the entire tank volume.

112.7(a)(3)(iv) **Countermeasures for Discharge Discovery**

Releases from a leak or overfill would initially be contained by the containment pad that provides a secondary containment volume of 4,300 gallons. Should a release occur that exceeds the containment volume, it could potentially flow over the containment curb and flow by gravity following local contours toward the North and away from the property. Upon the discovery of any discharge, Island Fuel's Oil Spill Response Plan, included as Attachment 3, will be activated to ensure no release of fuel oil or diesel fuel escapes the containment pad or migrates off the facility property.

112.7(a)(3)(v) **Methods of Disposal of Recovered Materials**

Any leaks or minor spills will be cleaned up with absorbents and shipped offsite to a licensed facility for disposal. Spill cleanup contractors would be used to handle larger spills. A larger spill would be removed via a vacuum truck from the containment area and sent offsite for oil reclamation or disposal at a licensed facility. Contact numbers for spill response contractors for larger spills are included on page 5 above under Emergency Phone Numbers, in addition to being listed in the following section.

112.7(a)(3)(vi) **Contact List and Phone Numbers**

In the event of a spill, discharge, fire, explosion or other emergency, the following company personnel have been designated to serve as "Spill Prevention Control Coordinators". The Coordinators are familiar with all aspects of this plan, the activities, operations, and layout of the Island Fuel facility and the locations of the emergency equipment within the facility. The Coordinators are authorized to commit the full resources needed to respond to an emergency situation and are listed in the order which they are to be notified.

Spill Prevention Control Coordinator:

Jay McMann, Facility Co-owner	(Work) 508-696-5959 (Cell) 508-560-3594

Alternates:

Brian McBride, Facility Co-owner	(Cell) 917-402-9432
Carmen Ciminski, Office Manager	(Cell) 801-214-3377

Other Telephone Numbers:

Local Fire Department	911
Environmental Protection Agency Region 1	888-372-7341
MA Department of Environmental Protection	888-304-1133 (24 hr)

National Response Center	800-424-8802
Response Environmental	866-577-5274
Herrygers Environmental	877-547-2748
Martha's Vineyard Hospital	508-693-0410

112.7(a)(4) **Response Plan**

A Facility Response Plan in accordance with 112.20 is not required for this Facility as Island Fuel does not meet the substantial harm criteria that would require a response plan, however related information and requirements for mitigating and reporting a discharge are given in the Island Fuel's Oil Spill Response Plan, included as Attachment 3.

112.7(a)(5) **Plan Organization**

All procedures described in Island Fuel's Oil Spill Response Plan for use when a discharge occurs are readily accessible and useable to all facility employees.

112.7(b) **Spill Potential**

There are two major potential sources of spills at the Island Fuel Tisbury facility. The primary source being the activities associated with the loading and unloading area, and the second being the aboveground bulk storage tank itself.

The facility loading and unloading area has the highest potential for a spill or release of oil/diesel from a tank truck, hose connection, piping or equipment failure. Releases from a leak or tank overfill would initially be contained by the containment dike. A catastrophic failure that went undetected could exceed the 4,300 gallon capacity of the containment dike and would overflow the dike wall. Once beyond the containment dike, a spill would follow local ground contours leading off the facility property. Due to the largest compartment of delivery trucks loaded/off loaded at this facility being 2,650 gallons, the chances of a spill event exceeding 4,300 gallons is very unlikely.

The newly installed split compartment storage tank is also a potential source of a leak or spill at the facility, although the double wall design of the tank makes the chances of a tank failure leading to a spill very unlikely. The largest spill expected from a tank failure would be the total loss of a single compartment, or roughly 5,000 gallons. The chance of a failure of both tank compartments at the same time is very unlikely. As with a loading/unloading spill, a storage tank failure in excess of the 4,300 gallon containment dike would escape over the dike wall and follow local ground contours away from the facility.

The Roth 275-gallon heating oil tank is a double wall design so that a leak of the primary tank would be contained by the outer shell. Should a leak manage to get through both tank walls it would spill onto the ground behind the office building. The chances of a breach of the Roth tank is very unlikely due to the design of the tank and the galvanized steel construction.

112.7(c)(1) **Containment and/or Diversionary Structures**
(Onshore Facilities)

The concrete containment pad provides 4,300 gallons of secondary containment capacity for leaks or spills that may occur during loading/unloading operations. Secondary containment for the bulk storage tank is provided by its double wall design, which provides 100% containment of the primary tank contents.

Secondary containment for the heating oil stored in the Roth tank is provided by the double wall design of the galvanized steel tank.

Absorbent materials are readily available to contain minor spills. Larger spills, once contained by the concrete containment pad, would be removed by pumps and/or vacuum trucks. Absorbent materials to contain minor spills are kept in strategic locations within the facility.

112.7(c)(2) **Containment and/or Diversionary Structures**
(Offshore Facilities)

N/A

112.7(d) **Practicability of Installed Containment Structures**

The use of the passive in-place secondary containment pad in combination with active containment measures such as the use of readily available spill response equipment is a practical and effective means at this facility to prevent discharged oil from reaching navigable waters.

112.7(e) **Inspections, Tests, and Records**

Continuous visual inspection is made of the storage tank, the Roth heating oil tank, piping, fittings, gaskets, pumps and loading/unloading equipment by facility personnel while they are in the process of performing their routine functions. A documented inspection of the tanks and all related equipment is performed once per month. A signed record is kept of these inspections for a period of three years. A sample Inspection Form is included as Attachment 4.

112.7 (f) **Personnel, Training, and Discharge Prevention Procedures**

112.7(f)(1) **Personnel Training**

All facility personnel are trained to operate and maintain the equipment used in oil operations to prevent discharges. Training includes discharge procedure protocols, applicable pollution control laws, rules, and regulations, general facility operations, and the contents of the Island Fuel Facility SPCC Plan. Training is the responsibility of the

Spill Prevention Control Coordinator. Employees are required to immediately report all malfunctioning equipment and any other potential cause of an oil spill. Review of oil handling and spill prevention procedures are held annually for all employees and prior to the start of work for new employees. Documentation of this training is recorded on the Training Record, included as Attachment 5.

112.7(f)(2) **Designated Person**

The Spill Prevention Control Coordinator is responsible for ensuring that all workers complete the training program outlined above, in addition to having the overall responsibility for oil spill prevention at the facility. The current Spill Prevention Control Coordinator is Jay McMann.

112.7(f)(3) **Discharge Prevention Briefings**

Scheduled discharge prevention briefings for the operating personnel are conducted at least once a year to assure adequate understanding of the SPCC Plan. New employees receive training before they begin operational activities. The briefings will highlight and describe any known discharges that have occurred since the last briefing, along with any failures, malfunctioning components and any recently developed precautionary measures. All briefings and training is documented on the Training Record, included as Attachment 5.

112.7(g) **Security**

112.7(g)(1) **Perimeter Fencing**

There is no perimeter fence at the Tisbury facility to secure and control access to the facilities loading/unloading area or bulk storage tank, however its proximity to Evelyn Way allows for visibility by local police during routine patrols, which discourages unauthorized and off-hours access.

112.7(g)(2) **Master Flow and Drain Valves**

There are no master flow or drain valves on the bulk storage tank that if opened would permit direct outward flow of the products stored to the surface ground or containment pad. There is a drain line and valve for the containment pad that is normally closed and locked to prevent unauthorized release of the containment pad contents.

112.7(g)(3) **Pump Controls**

Control of the loading/offloading pumps is restricted by the Scully electronic terminal and tank truck control system installed at the facility. The facilities pumps can only be operated when interlocked connections to the Scully system, the pumps, and the delivery or offloading vehicle are properly made. Any failed connection prevents the pumps from being operated. The Scully system only allows pump operation in conjunction with