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NSY PORTSMOUTH
5090.3a

LETTER REGARDING ACTIONS TAKEN TO PREVENT OIL DISCHARGES PER THE
CONSENT AGREEMENT AT NSY PORTSMOUTH ME
10/19/1993
PORTSMOUTH NAVAL SHIPYARD



DEPARTMENT OF THE NAVY
PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

FILE

IN REPLY REFER TO **Checked by**

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Scott D. Whittier, Director
Division of Oil and Hazardous Waste Facilities Regulation
Bureau of Hazardous Materials and Solid Waste Control
Department of Environmental Protection
Augusta, ME 04333

Dear Mr. Whittier:

On 28 July 1993 Portsmouth Naval Shipyard entered into a Consent Agreement with the State of Maine Department of Environmental Protection (DEP). By executing the Consent Agreement the Shipyard agreed to take certain actions that would help prevent oil discharges. The following is the list of those actions and their current status.

[Signature]
248

1. Develop and implement preventative maintenance requirements for oil handling equipment/machinery which minimize the potential for occurrence of oil discharges;

The Shipyard performs preventive maintenance on its oil handling equipment. All shops have been directed to assure preventative maintenance procedures are properly documented. Where the shops conduct a visual check of their equipment, the attributes the shop must inspect will be identified and certified as part of a pre-requisite check-off list, prior to system use. Expected completion: 30 Nov 1993.

2. Revise as appropriate, and implement its standard operating procedures for the transfer of oil at the Shipyard which minimize the potential for the occurrence of oil discharges. The procedures must outline the steps to be taken prior to the commencement of oil transfers and monitoring procedures to be implemented during oil transfers. The procedures must be posted or otherwise be made readily available in areas where oil transfers are likely to occur. Personnel involved or likely to be involved in oil transfers will be required to review the procedures annually and within 5 working days after a spill event which results in the discharge of oil to a sanitary sewer or surface water;

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Operating procedures for the Shipyard oil transfer evolution's are covered by various instructions. Recently the Shipyard issued Process Instruction 965, Oily Waste Handling, which has contributed to the reduction of Shipyard spills. This instruction covers step by step procedures to be taken prior to oil transfer operations and monitoring procedures that are implemented during oil transfers. Currently some of these instructions are in the process of being updated to identify discharge prevention procedures and to provide check-off lists to assure pollution prevention attributes are certified prior to system use. They will also include procedures for ensuring that personnel review the procedures annually and within 5 working days after a spill event that enters a sanitary sewer or surface water. In the interim the Shipyard will issue a Shipyard Notice by 30 Nov 1993 to all shops and codes enforcing the required review procedures. Following is a list of these instructions and their expected completion dates for the above mentioned changes.

- ✓ a. Shipyard Notice requiring all shops and codes to comply with required review procedures for oil discharges entering a sanitary sewer or surface water.
Expected completion: 30 Nov 1993
- ✓ b. Process Instruction 965, Oily Waste Handling *done*
Complete except for review procedures: issued 29 Jan 1993
- c. Fuel Operations Manual (5090.1) *SUPPORT*
Complete except for review procedures: issued 1 Sep 1993
- d. Process Instruction 229, Hydraulic Oil System Flushing
Expected completion: 1 Jan 1994 *Code 260*
- ✓ e. Process Instruction 463, Diesel Oil Handling
Expected completion: 1 Jan 1994 *Chop*
- ✓ f. Process Instruction 464, Lubricating Oil Handling
Expected completion: 1 Jan 1994 *done*
- g. Process Instruction 968, Oily Waste Processing Unit (draft)
Expected completion: 1 Jan 1994 *draft*
- h. Shop 03 Instruction on Handling of Diesel Oil
Expected completion: 1 Jan 1994 *BILLEN BARGE*
- ✓ i. Procedures for Receiving #6 Fuel Oil
Expected completion: 1 Jan 1994

3. Submit a schedule for evaluating all oil handling equipment and machinery to determine if such equipment has been effective in preventing oil discharges and also submit a schedule for repairing or replacing any equipment determined by the Shipyard to be ineffective in preventing oil spills. The Shipyard shall evaluate the feasibility of installing and using overfill alarms and automatic shut-off devices for its oil handling equipment, and shall also submit a schedule for repairing or replacing any equipment determined by the Shipyard to be ineffective in preventing oil spills;

The Shipyard has completed its evaluation of all past oil spills to determine what oil handling equipment and machinery was involved and to identify any equipment deficiencies. The review showed:

- a. The hose used for diesel fuel oil operations was not suited for prolonged fueling use. Procurement specification for higher quality hose was prepared and procurement of the new hose will be by 30 November 1993.
- b. There is no institutionalized standard for secondary containment of hoses or equipment. Much of the containment is provided by shop personnel. Engineering evaluated secondary containment methods and will add to the checkoff list that mechanical joints on hoses will be bagged.
- c. The internals of the "Wilden" pumps used for diesel fueling could not be verified as fuel oil compatible. As a precautionary measure, the Temporary Service Shop has ordered fuel compatible material from the manufacturer. Expected procurement date of 1 Jan 1994.
- d. There is no institutionalized standard for rigid support of hoses over water to prevent sagging or strain of hoses. Engineering evaluated the use/method of strain relief and will add to the checkoff list and process instruction that hoses will be placed on brows where possible and where impossible cable will be used for strain relief.
- e. The Shipyard has installed alarms and automatic shut-offs on various systems such as the Pipe Shop flushing barge and the Oily Waste Processing Unit. The Shipyard has determined that other systems do not require such action due to the fact that floats and alarms introduce added potential for failure as operators tend to rely on these devices for fail-safe operations. Tanks are equipped with sight glasses to enable visual monitoring. The Shipyard believes the most effective method to prevent overflow is alert monitoring, which enables immediate corrective action to be taken during

oil transfers. The Shipyard will continue visual monitoring as the primary method to prevent overflow, and will include this as part of the operating check-off list discussed in Para 2.

f. The Shipyard determined that the transportable oily waste tanks were ineffective to prevent oil spills. All but three of the large transportable oily waste tanks have been modified as follows: heater coil removed and blanked off, sight level gauge installed, new quick-disconnect fittings installed, fill line stenciled on the outside of the tank, and covers repaired and modified so they cannot be left open. The three remaining tanks are not in use at this time and will remain out of service until modified. Expected completion: 30 Nov 1993.

4. Submit to the Department for its review and approval a spill reporting and containment plan, within 60 days of signature of this agreement. The plan shall include a procedure for providing the Department with an immediate verbal report (within 2 hours) of each discharge along with a description of all measures the Shipyard will use to clean up the discharge. The plan will also address procedures to comply with the verbal reporting requirements when a prohibited discharge occurs during shifts other than the day shift, including weekends. These procedures will address the contents of the report as well as the issue of when and where the verbal reporting must be done during the non-business hours of the Department. The Department may require the Shipyard to revise the plan in order to approve the plan;

The Shipyard submitted its Oil and Hazardous Substance Spill Contingency Plan NAVSHIPYD PTSMHINST (5090.5A) on 20 July 1993 to Mr. Steve Eufemia from the Department of Environmental Protection, Portland ME office and to Ms. Stacey Ladner of the Augusta office. In the plan the Shipyard addresses the measures it will take during various types of oil spills and the notification procedures including "within 2-hour notification" during normal working hours. The Shipyard failed to address notification during shifts other than day shift, weekends and holidays. Enclosure 1 is the Shipyard procedure for addressing other than normal shift hours. This procedure will be added to 5090.5A during the next update, scheduled for 1 Jan 1994.

5. Upon approval of the spill reporting and containment plan by the Department immediately implement the plan.

The Shipyard has implemented the Contingency plan (5090.5A) and is in the process of making the first update. We have implemented the new "within 2-hour notification" procedures and will modify the Contingency Plan (5090.5A) accordingly.

Portsmouth Naval Shipyard has in the past two years accomplished many actions to minimize the potential for oil spills. The Shipyard has modified seventeen Transportable Oily Waste Tanks, published a Process Instruction for handling oily waste, revised our Oil Spill Prevention Control and Countermeasure Plan, revised our Oil and Hazardous Substance Spill Contingency Plan, and issued a Fuel Operations Manual (5090.1). The Shipyard has instructed over 4,500 personnel in environmental awareness; the training emphasized spill prevention and included a legal briefing on the importance of oil spill prevention.

These efforts have successfully lowered our oil spill rate when compared to past years. It is the intention of the Shipyard to continue to emphasize those actions that minimize the potential for oil spills and of course to continue to monitor the Shipyard's effectiveness for oil spill prevention.

L. C. HORNE
Captain, USN

Enclosure:

(1) NAVSHIPYD PTSMH NOTICE 5090

Blind copy to:

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DEPARTMENT OF THE NAVY

PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N. H. 03804-5000

IN REPLY REFER TO:

NAVSHIPYD PTSMHNOTE
5090 (120)
18 Oct 93

NAVSHIPYD PTSMH NOTICE 5090

From: Commander, Portsmouth Naval Shipyard

Subj: SPILL NOTIFICATION GUIDELINES FOR STATE OF MAINE
AND THE NATIONAL RESPONSE CENTER.

Encl: (1) State of Maine Spill Report
(2) National Response Center Spill Report

1. Purpose. To establish the procedure for reporting spills to the State of Maine and the National Response Center (NRC) on after normal shift hours, and on weekends and holidays.

2. Cancel. None

3. Effective Date. 20 Oct 1993

4. Scope. This notice pertains to all security personnel who are responsible for making spill notification to the State of Maine (within 2 hours) and the NRC on after normal shift hours, and on weekends and holidays.

5. Responsibilities

5.1 Security personnel will use enclosure (1) to report spills to the State of Maine (within 2 hours) and enclosure (2) for Spills reported immediately to the NRC.

5.2 Code 122.5 will provide information about enclosure (1) and (2) upon request.

6. Cancellation. This notice is cancelled on 01 Oct 1994.

PAUL L. CLARK
By direction

Distribution:

106, 120, 121, 122, 500, 560, 563, 860, 862 (15), 1710, 1740

Enclosure 1

STATE OF MAINE
SPILL REPORT
1-800-452-4664

This call is to notify you of a oil discharge which occurred at (time) _____ on (date) _____. The spill location was the Portsmouth Naval Shipyard. The approximate quantity spilled was _____. My name is _____ My telephone number is area code (207) 438-2230

Note: This information must be reported to the State of Maine immediately at 1-800-452-4664 after a discharge of oil to the river, storm drain, or a sanitary sewer.

Note: This notification must not be delayed for lack of information and must be made within 2 hours.

Note: Fax this completed form to Code 122 at extension 5173

Enclosure 1

**NATIONAL RESPONSE CENTER
SPILL REPORT**

**1-800-424-8802 or
1-202-267-2675**

This call is to notify you of a 1. oil discharge or, 2. hazardous substance spill (material if known), which occurred at (time) _____ on (date) _____. The spill location was the Portsmouth Naval Shipyard. The spill was on 1. water, 2. air, 3. ground. The approximate quantity spilled was _____. Cause of the spill (if known) _____.
My name is _____ My telephone number is _____ area code (207) 428-2230.

Note: This information must be reported to the NRC at 1-800-424-8802 or 1-202-267-2675 immediately after;

- 1. Discharge of oil or hazardous substance to the river, storm drain, or sanitary sewer.*
- 2. Immediately after a discharge of a hazardous substance to air or ground.*

Note: Notification must not be delayed for lack of information and must be made immediately.

Note: Fax this completed form to Code 122 at extension 5173

Enclosure 2