

Revision Date: Nov 2015

Review Date:

Information Requests Downstream User

Procedure #

P-004

Purpose - Provide SARA Title III facilities with a means of securing a list of downstream user for use in their various planning requirements.

Scope – Provide a list of downstream users to SARA Title III facilities while providing security for the general public and facilities in the dissemination of this information.

Downstream Notification List Requirements

Industrial and commercial installations which have the potential for causing accidental pollution of air, land or water, or the endangerment of public health and safety are required to develop and implement Preparedness, Prevention and Contingency (PPC) Plans. A PPC Plan is required for any NPDES Application for Storm Water Discharge General Permits or Water Management Permits.

In the case of regulated storage tank facilities, with aggregate aboveground storage capacity > 21,000 gallons, a Spill Prevention Response (SPR) plan is required. This SPR plan, in addition to the contents of a PPC plan, requires a specific downstream notification requirement. Those storage tank facilities that already have a PPC plan need only update the PPC plan and include the downstream notification requirement.

Pennsylvania Department of Environmental Protection strongly recommends that regulated facilities consolidate all required plans into one single document. For those facilities required to develop plans under SARA Title III, the Department will support deviation from the format suggested in the Development and Implementation of Environmental Emergency Response Plans (400-2200-001) guidance document to ensure consistency with the SARA Title III plans provided that all required information is included in the one plan.

Downstream Notification Requirement for Storage Tanks

The requirement includes a 20-mile downstream notification list, an annual notification requirement, and an annual notification list update.

Downstream Notification List shall include all municipalities and surface water users within 20 downstream miles of the tank facility. Surface water users include drinking water companies, and industries that utilize surface water intakes; and municipalities include each county, township, city and borough located within this downstream corridor.

An **Annual Written Notification** must be given to downstream water users and municipalities on the notification list. This written notification at a minimum must include a detailed inventory of the type and quantity of material in storage at the facility.

An **Annual Update** must be developed each year. This notification list update will show any changes in contacts, users, telephone #'s needed for emergency downstream notification and the annual written notification. Also, any changes in the emergency response organization (such as telephone numbers) should be updated.

Procedure

The LEPC has developed a list of downstream water users for the Delaware County area. The listing of potential downstream users is available to SARA Title III facilities for planning purposes. This list may not include those areas north or south of the Delaware County line. For SARA Title III facilities or a contractor working for the facility to obtain the list the following procedure will be followed:

- 1) The requesting SARA facility (contractors will not have access to the list unless requested by the SARA facility representative) will complete the Downstream User request form and email it to the LEPC Coordinator at jdirocco@lepc.org or mail the request to the LEPC at 360 North Middletown Road, Media, PA 19063. The requestor will provide a contact number so the Coordinator can contact them.
- 2) The completed form will be reviewed and if approved the list will be emailed to the requestor.
- 3) Requestor must note that the list is subject to change as facilities change with business exigencies. The list should be checked before submitting in the plan.

Downstream User List Request Form

Please read the attached procedure before completing this form. Failure to provide specified information may result in a denial of your request.

Contractors will not have access to the list unless requested by the SARA facility representative.

Requestor Name: _____

Address: _____

Phone number: _____

Fax number: _____

E-mail address: _____

Reason for Requesting to read this information: Again, please provide sufficient information to support your request. If you are affiliated with any organizations, your reason for the review, your intention or use for the information after review, etc.

Signature:

Company Representative:

Date:

Cc: LEPC File