

**Sent Via Electronic Mail**

July 17, 2020

Mr. Kyle Ruf  
Chairman, Water Authority of Dickson County  
101 Cowan Road  
Dickson, Tennessee 37055

Re: Titan Partners LLC Terminal  
Dickson, Tennessee

Dear Mr. Ruf:

Titan Partners, LLC (Titan) understands that the Water Authority of Dickson County (WADC) has questions regarding the planned petroleum terminal to be constructed in Dickson County, Tennessee. Titan would like to take this opportunity to provide additional information regarding these areas of concern:

**Terminal Description**

The terminal will consist of six (6) aboveground storage tanks that will be used to store Gasoline, Distillate, and Transmix. These tanks will be constructed inside a secondary containment dike that has sufficient capacity to contain the contents of the largest tank plus a rainwater volume calculation. Several smaller tanks will be used to contain the fuel additives that are blended into the gasoline and diesel at the loading rack as the tanker trucks are loaded. One (1) fire water tank will be constructed onsite to supply the site fire suppression systems.

**Spill Prevention, Control, and Countermeasures (SPCC) Plan**

Titan is in the process of preparing a SPCC Plan for the terminal in accordance with the requirement of Federal Regulation 40 CFR 112. As prescribed in the federal regulation, the final version of the SPCC Plan will be completed and certified by a Tennessee Professional Engineer (PE) when a site inspection of the constructed terminal is completed, and final surveying of the completed containment areas are verified. Titan has previously agreed to provide the WADC Executive Director with a draft version of the SPCC based on the current design criteria by August 7, 2020. Following that submittal, Titan will meet with the WADC staff in mid-August to review the plan and other technical submittals that were requested. Titan staff and consultants are prepared to communicate with the WADC and its consulting engineers throughout the development process of the SPCC Plan for the terminal until the final version is certified. Titan will submit the finalized and PE Certified version of the SPCC Plan to the WADC and TDEC and will notify the agencies of any modifications once the terminal is operational.

Spill prevention equipment at the terminal includes tank overflow protections via multiple gauging alarms, automatic and manual shutdown features at the loading rack, and a separate containment system for trucks at the loading rack.

## **Additional Plans**

In addition to the SPCC Plan, Titan will prepare an Emergency Response Action Plan (ERAP), Fire Pre-Plan, and Storm Water Pollution Prevention Plan (SWPPP) or Best Management Practices Plan (BMP). Titan will contract regional and national oil spill response contractors (OSROs) to provide response and recovery readiness for the terminal. Titan and the OSRO contractors will stage emergency response equipment at the terminal and complete spill response drills. The Titan emergency response plans identify sensitive receptors that could potentially be impacted by an incident at the terminal. Protective measures for those receptors are incorporated into the protection and response strategies. The WADC water intake in Turbull Creek is one of the sensitive receptors identified for the Titan Terminal and will be planned for accordingly in cooperation with WADC.

## **Fire Planning**

The fire prevention and suppression planning for the terminal is being completed by a Titan Fire Safety Engineer and ESDC Engineering. Titan is coordinating this planning with the Dickson County, Dickson City, and Burns Fire Departments. Dickson County Emergency Management will be requested to provide review and oversight of the terminal Fire Pre-Plan that will be developed during facility construction. Titan is evaluating the feasibility of utilizing a fluorine-free and PFAS-free foam suppression agent that is approved by Dickson County Emergency Management for the Dickson Terminal project. There continues to be development and approval of agents that are more effective, and environmentally friendly and we are following these developments to select the best agent, although this may not occur until 2021. Our design also includes testing capability of the foam system that can be achieved with water instead of using foam concentrate.

## **Construction Impact to the Watershed**

Titan understands that WADC has concerns regarding the impact on the watershed during construction based on previous projects completed by others in the region. Titan has developed a Construction Storm Water Pollution Prevention Plan (SWPPP) and submitted to the TDEC. The SWPPP includes the use of Best Management Practices (BMPs) to prevent sediment or other material from impacting the surface water near the site, primarily tributaries to Nails Creek. Titan will obtain pre-construction baseline water quality samples of Nails Creek and will complete additional sampling during construction to ensure effectiveness of the project BMPs. Titan will complete inspections of the tributaries and Nails Creek during construction activities at the site and will notify WADC of any anomalies.

## **Tanker Truck and Pipeline Oversight**

The design of the Titan Terminal will provide spill containment and fire suppression for the tanker trucks while they are at the loading rack. Titan response plans include the potential for a tanker truck incident at the loading rack, but outside of the terminal the trucks fall under the jurisdiction of the Department of Transportations (DOT). The pipeline that the terminal is proposed to connect with is an interstate pipeline under the jurisdiction of the Pipeline Hazardous Materials and Safety Administration (PHMSA).

## **Site Conceptual Model**

Currently Titan is utilizing data collected during two (2) soil boring programs to construct a Site Conceptual Model of the terminal site. This process is designed to provide a more detailed characterization of the site subsurface to assist with response planning purposes. Titan will review the results of this study with the WADC when it is completed later this summer.

### **Additional Information**

As you know, Titan is a subsidiary of Buckeye Partners, LP (Buckeye). The Titan Terminal will have the full support and resources of Buckeye during the construction and operation of the facility. Buckeye has an internal notification process in addition to regulatory notification procedures that are required under Buckeye operating permits. All spills, some even measured in ounces that do not meet the state reportability requirements are reported internally and documented. This allows us to identify trends and other opportunities for improvement.

Buckeye has an internal Asset Integrity program and staff that continuously monitor the integrity of our assets to prevent spills. All of our field employees receive incident management training using the Incident Command System (ICS), and we train and drill with local emergency responders and contracted cleanup companies.

In the event of an incident, Buckeye initiates the appropriate emergency plan for that location and situation. Field locations are authorized to mobilize whatever response equipment they need. Corporate Buckeye HSSE staff and Operation staff from the Buckeye District Office, as well as other Districts, respond to assist in the event of a spill or incident. We utilize equipment, boats, and aircraft as needed to quickly address the situation. Buckeye Field and Corporate staff are trained in Incident Command and work in cooperation with the regulatory and response agencies to protect the public and the environment.

Buckeye has set up site specific emergency plans for all of its terminals. The plans required for each facility vary depending on the nature of the operations, and whether product is transported to and from the site by pipeline, tanker trucks, railcars, or marine vessels. Plans, exercises, drills and inspections are completed in cooperation with the agencies that regulate the operation of our terminals. As part of all of these plans, the Buckeye facilities perform integrity inspections, file reports with the agencies, and are subject to regulatory inspections. This entire program is continually being enhanced and improved as we learn, and new innovations come online to make our operations better.

I hope the information in this letter is helpful in addressing questions regarding the Titan Terminal. Our Project Manager (Mark Fetchko) will continue regular communications with Mr. Michael Adams, Executive Director at WADC, and I encourage you to contact Mark or myself with any questions. Our intent is to work in partnership with WADC and other agencies as we move forward with the project.

I can be reached at [nmchugh@buckeye.com](mailto:nmchugh@buckeye.com) (723-259-9520), and Mark Fetchko can be reached at [mfetchko@buckeye.com](mailto:mfetchko@buckeye.com) (484-408-5365).

Sincerely,



Neal McHugh  
Manager, Environmental Project Support

C: Mr. Michael Adams, WADC