

## Doss, Gary

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**From:** Rivera, Nelson A <Nelson.A.Rivera@hud.gov>  
**Sent:** Thursday, February 05, 2015 3:36 PM  
**To:** Smith, Lawrence  
**Cc:** 'Pettit, Chris'; 'NJERRQUESTIONS (NJERRQUESTIONS@icfi.com)'; Doss, Gary; 'Jerri Weigand'; 'William Lindner'; 'Kim McEvoy'; Furda, Michael R; Fretwell, Therese J  
**Subject:** RE: SBL39754 Yank Marine Services

Lawrence,

Greetings,

The proposed language in your email below is acceptable to the U.S. Department of Housing and Urban Development following the standards under the regulation 24 CFR Part 51 Subpart C.

Thanks

Nelson

NELSON A. RIVERA, R.E.M.  
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U.S. Department of Housing and Urban Development  
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**From:** Smith, Lawrence [mailto:lismith@Dewberry.com]  
**Sent:** Thursday, February 05, 2015 12:52 PM  
**To:** Rivera, Nelson A  
**Cc:** 'Pettit, Chris'; 'NJERRQUESTIONS (NJERRQUESTIONS@icfi.com)'; Doss, Gary; 'Jerri Weigand'; 'William Lindner'; 'Kim McEvoy'; Furda, Michael R; Fretwell, Therese J  
**Subject:** RE: SBL39754 Yank Marine Services

Nelson,

Thanks for the info. We can increase the distance from 100 to 110 feet for the proposed locations for tanks 1-5. We can also expand upon the language for Tank 6, stating that the tank must be diked and thermal mitigation measures will need to be incorporated, and that those mitigation measures must be approved by HUD. Below is the updated language (additions are in blue) that will be included in the EA.

Please confirm that this language is acceptable and thank you for the help.

The applicant will be expanding the size of their dock to accommodate larger boats. While none of the on-site buildings will be increased in size, the applicant has stated that the project will enable them to increase the number of employees they hire (as a result of increased business operations from the larger dock facilities). The property has the following above-ground storage tanks:

1. 275 gallon diesel fuel (in use)

2. 500 gallon gasoline (not in use)
3. 275 gallon used oil (periodically in use)
4. Approx. 1,000 gallon diesel fuel (periodically in use - used as a holding tank when ships are docked)
5. Approx. 500-gallon "spare" tank (not in use)
6. 275 gallon heating oil tank (in use)

Attached is a map showing the locations of these tanks (see ASD Map). Tanks 1-3 are within a bermed concrete block diked enclosure, measuring approximately 20 feet by 15 feet by 2 feet high. Tank 4 is within a separate secondary containment system, adjacent to tanks 1-3 (see photo "TankPic1"). Based on our previous consultations with you, Tank 4's containment system can be considered a "dike" for the purposes of Acceptable Separation Distance calculations. The containment for this tank measures approximately 15 feet by 8 feet by 2 feet high. We have calculated the ASD for these two tank enclosures to be 94 feet and 63 feet, respectively, for Thermal Radiation for People. The proposed expanded docks are within this area. Tank 5 is not in use and is located about 100 feet southeast of tanks 1-4 (see TankPic 2).

Since these tanks are only periodically in use and/or not used, we recommended to the applicant (and they agreed) that they store Tanks 1-5 permanently in an alternative location on the property (see map for suggested locations). We acknowledge that operations may require the tanks to be located in proximity to the docks while in use; therefore, we suggest that the tanks only temporarily remain in their current location. The new alternative location will need to be bermed in a manner that is sufficient to contain any spill (similar to the existing location). **Based on the size and capacity of the tanks, the proposed location's diked area must be at least 12 feet by 36 feet by 12 inches high, and located at least 110 feet from any building.** In addition, we suggest placing the tanks on the central or eastern portion of the property, outside of the 100-year floodplain. The applicant has indicated that they are willing to meet these recommendations, and these recommendations will be incorporated into our report.

Tank 6 provides heating oil to the main building (see "TankPic3"). As a result, this tank cannot be relocated; however, this tank is not located in the floodplain. We do recommend that the tank be placed within secondary containment **that serves as a diked enclosure and is sufficient to capture any release.** We also recommend that the applicant construct a **thermal mitigation barrier** (such as a concrete block wall) between this tank and the main building to mitigate ASD concerns. Any mitigation measure proposed would need to be approved by HUD prior to construction.

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**From:** Rivera, Nelson A [<mailto:Nelson.A.Rivera@hud.gov>]

**Sent:** Thursday, February 05, 2015 10:59 AM

**To:** Smith, Lawrence

**Cc:** 'Pettit, Chris'; 'NJERRQUESTIONS ([NJERRQUESTIONS@icfi.com](mailto:NJERRQUESTIONS@icfi.com))'; Doss, Gary; 'Jerri Weigand'; 'William Lindner'; 'Kim McEvoy'; Furda, Michael R; Fretwell, Therese J

**Subject:** RE: SBL39754 Yank Marine Services

Lawrence,

Greetings,

Thanks for your inquiry,

Before providing any specific guidance, let's breakdown the total volume capacity of the tanks being assessed, following the mitigation plan as presented in your email below as follow:

1,275 gallons of diesel fuel – This is volume capacity for storage of tanks number 1 and 4. The “periodically used” I must consider them as “in use” for Acceptable Separation Distance calculations

1,000 gallons – Volume capacity of a not in use gasoline tank (tank number 2) and a not in use “unknown content” tank (tank number 5)

275 gallon – Used oil tank (tank number 3)

275 gallon – heating oil tank (tank number 6)

So the total tank volume being relocated to an alternative location is 2,550 gallons.

**Since the tank (s) are being proposed to have a secondary containment unit, the tank (s) area should encompass an area no less than 12 feet by 36 feet by 12 inches high.**

Since the fuel, held in stationary, aboveground containers pose a thermal radiation hazard to the proposed HUD-assisted project location, for buildings and people, Acceptable Separation Distance (ASD) assessment is required to be accomplished for thermal radiation, but not for blast overpressure since the assessed product is not under pressure.

The ASD assessment results are as follow:

ASD for thermal radiation for people – 108.93 feet

ASD for thermal radiation for buildings – 18.03 feet

**In accordance with the provided email, you specified that the new proposed location will be at least 100 feet away from any building. In accordance with my calculations, if you make that distance greater than 108.93 feet, then the new location of the tanks will meet the standard for thermal radiation for people and buildings, and no additional mitigation measure would be required.**

Regarding the tank number 6, holding 275 gallons, also pose a thermal radiation hazard to the proposed HUD-assisted project location, for buildings and people, Acceptable Separation Distance (ASD) assessment is required to be accomplished for thermal radiation, but not for blast overpressure since the assessed product is not under pressure.

**The ASD assessment results are as follow without a dike, since I do not know how far the tank will be from the dwelling (need of space to accommodate the dike area between the tank and the dwelling):**

ASD for thermal radiation for people – 161.52 feet

ASD for thermal radiation for buildings – 27.68 feet

**The proposal will require either of thermal mitigation or a dike with enough distance between the dike and the dwelling to mitigate the thermal radiation from the tank's contents in case this one caught on fire.**

I am available for discussion of the mitigation proposal for this project, any question regarding the content of this guidance, please let me know

Thanks

Nelson

NELSON A. RIVERA, R.E.M.  
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<http://www.hud.gov/offices/cpd/environment/index.cfm>

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**From:** Smith, Lawrence [<mailto:lismith@Dewberry.com>]  
**Sent:** Tuesday, February 03, 2015 1:02 PM  
**To:** Rivera, Nelson A  
**Cc:** Pettit, Chris; NJERRQUESTIONS ([NJERRQUESTIONS@icfi.com](mailto:NJERRQUESTIONS@icfi.com)); Doss, Gary; Jerri Weigand; 'William Lindner'; Kim McEvoy  
**Subject:** SBL39754 Yank Marine Services

Nelson,

We are currently preparing an environmental assessment on behalf of the New Jersey Department of Environmental Protection (NJDEP) for the above HUD-funded CDBG-DR project. The project is located at 487 Main Street in Dorchester, Maurice River Township, Cumberland County, New Jersey. The Yank Marine Services facility builds and services private, commercial and government-owned boats. The proposed activities at the site include the demolition of an existing damaged pier and replacement with two new piers to support a larger boat lift. In addition, a berthing pier will be constructed at the site. The project has received permit approvals from the New Jersey Division of Land Use Regulation (DLUR) as well as the U.S. Army Corps of Engineers (USACE). For your reference, we have attached the approved permits, which include a complete description of project activities and site plans. We note that in December 2014, both permits were granted extensions.

The applicant will be expanding the size of their dock to accommodate larger boats. While none of the on-site buildings will be increased in size, the applicant has stated that the project will enable them to increase the number of employees they hire (as a result of increased business operations from the larger dock facilities). The property has the following above-ground storage tanks:

1. 275 gallon diesel fuel (in use)
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Attached is a map showing the locations of these tanks (see ASD Map). Tanks 1-3 are within a bermed concrete block diked enclosure, measuring approximately 20 feet by 15 feet by 2 feet high. Tank 4 is within a separate secondary containment system, adjacent to tanks 1-3 (see photo "TankPic1"). Based on our previous consultations with you, Tank 4's containment system can be considered a "dike" for the purposes of Acceptable Separation Distance calculations. The containment for this tank measures approximately 15 feet by 8 feet by 2 feet high. We have calculated the ASD for these two tank enclosures to be 94 feet and 63 feet, respectively, for Thermal Radiation for People. The proposed expanded docks are within this area. Tank 5 is not in use and is located about 100 feet southeast of tanks 1-4 (see TankPic 2).

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Tank 6 provides heating oil to the main building (see "TankPic3"). As a result, this tank cannot be relocated; however, this tank is not located in the floodplain. We do recommend that the tank be placed within secondary containment sufficient to capture any release. We also recommend that the applicant construct a barrier (such as a concrete block wall) between this tank and the main building to mitigate ASD concerns. Any mitigation measure proposed would need to be approved by HUD prior to construction.

Please let us know your thoughts. If you require any further information or supporting documentation, don't hesitate to contact us.

Take Care,

Larry

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