

Southwestern University

Spill Prevention Control and

Countermeasure Plan





Goal:

- 1. To prevent oil discharges from reaching storm drains and surface waters
- 2. To establish proactive prevention measures and inspections to meet goal #1
- 3. To establish effective and timely reactive response to an oil discharge with proper spill control media and trained personnel to meet goal #1

EPA Regulation: 40CFR Part 112



# U.S. ENVIRONMENTAL PROTECTION AGENCY TIER I QUALIFIED FACILITY SPCC PLAN TEMPLATE

# Instructions to Complete this Template

This template is intended to help the owner or operator of a Tier I qualified facility develop a self-certified Spill Prevention, Control, and Countermeasure (SPCC) Plan. To use this template, your facility must meet all of the applicability criteria of a Tier I qualified facility listed under §112.3(g)(1) of the SPCC rule. This template provides every SPCC rule requirement necessary for a Tier I qualified facility, which you must address and implement.

You may use this template to comply with the SPCC regulation or use it as a model and modify it as necessary to meet your facility-specific needs. If you modify the template, your Plan must include a section cross-referencing the location of each applicable requirement of the SPCC rule and you must ensure that your Plan is an equivalent Plan that meets all applicable rule requirements of 40 CFR 112.6(a)(3).

You may complete this template either electronically or by hand on a printed copy. This document is a reformatted version of the template found in Appendix G of 40 CFR part 112.<sup>a</sup> No substantive changes have been made. Please note that a "Not Applicable" ("N/A") column has been added to both Table G-10 (General Rule Requirements for Onshore Facilities) and Table G-11 (General Rule Requirements for Onshore Oil Production Facilities). The "N/A" column should help you complete your self-certification when a required rule element does not apply to your facility. Use of the "N/A" column is optional and is not required by rule.

All Tier I qualified facility self-certifiers must complete Sections I, II, and III. Additionally, the owner or operator of an:

- Onshore facility (excluding production) must complete Section A.
- Onshore oil production facility (excluding drilling and workover facilities) must complete Section B.
- Onshore oil drilling and workover facility must complete Section C.

Complete and include with your Plan the appropriate attachments. You should consider printing copies of the attachments for use in implementing the SPCC Plan (e.g. Attachment 3.1 - Inspection Log & Schedule; Attachment 4 - Discharge Notification Form).

To complete the template, check the box next to the requirement to indicate that it has been adequately addressed. Either write "N/A" in the column or check the box under the "N/A" column to indicate those requirements that are not applicable to the facility. Where a section requires a description or listing, write in the spaces provided (or attach additional descriptions if more space is needed).

Below is a key for the colors used in the section headers:

Sections I, II, and III: Required for all Tier I qualified facilities
Section A: Onshore facilities (excluding production)
Section B: Onshore oil production facilities (excluding drilling and workover facilities)
Section C: Onshore oil drilling and workover facilities
Attachments: 1 - Five Year Review and Technical Amendment Logs 2 - Oil Spill Contingency Plan and Checklist 3 - Inspections, Dike Drainage and Personnel Training Logs 4 - Discharge Notification Form

After you have completed all appropriate sections, certify and date your Plan, and then implement it by the compliance date. If your facility was in operation before August 16, 2002, and you do not already have a Plan, then implement this template immediately. Conduct inspections and tests in accordance with the written procedures that you have developed for your facility. You must keep with the SPCC Plan a record of these inspections and tests, signed by the appropriate supervisor or inspector, for a period of three years.

Do not forget to periodically review your Plan (at least once every five years) or to update it when you make changes to your facility. You must prepare amendments within six months of the facility change, and implement them as soon as possible, but not later than six months following preparation of any amendment.

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

<sup>&</sup>lt;sup>a</sup> Please note that the use of this template is not mandatory for a Tier I qualified facility. You may also meet the SPCC Plan requirement by preparing a satisfactory Tier II qualified facility Plan, preparing a satisfactory Plan that is certified by a Professional Engineer, or by developing an equivalent Plan for a Tier I qualified facility. Further information on the requirements of these methods can be found in 40 CFR part 112.6(a)(1). If you use any of these alternative methods you must include a cross reference in your Plan that shows how the equivalent Plan meets all applicable 40 CFR part 112 requirements.

# Tier I Qualified Facility SPCC Plan

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in \$112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

#### **Facility Description**

Facility Name	Southwestern University				
Facility Address	1001 E. University Ave.				
City	Georgetown	State	Texas	ZIP	78626
County	Williamson	Tel. Number	512-863-1677		
Owner or Operator Name	Southwestern University				
Owner or Operator Address	1001 E. University Ave.				
City	Georgetown	State	Texas	ZIP	78626
County	Williamson	Tel. Number	5128631677		

#### I. Self-Certification Statement (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

#### I Bob Mathis

certify that the following is accurate:

- 1. I am familiar with the applicable requirements of 40 CFR part 112;
- 2. I have visited and examined the facility;
- 3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
- 4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
- 5. I will fully implement the Plan;
- 6. This facility meets the following qualification criteria (under §112.3(g)(1)):
  - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
  - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
  - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
- This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
- 8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

- 1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
- To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
- 3. Optional use of a contingency plan. A contingency plan:
  - a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and;
  - b. Must be prepared for flowlines and/or intra-facility gathering lines which do not have secondary containment at an oil production facility, and;
  - c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature		Title:	AVP for Facilities & Campus Services
Name	Bob Mathis	Date:	8 / 25 / 2011

## **II. Record of Plan Review and Amendments**

#### Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation, and complete the Five Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or	
maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines.	Х
Examples include adding or removing containers, reconstruction, replacement, or installation of piping	
systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to	
standard operating procedures.	
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.	V
[§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	X

## **III. Plan Requirements**

## 1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities					
This table includes a complete list of all oil storage containers (aboveground containers <sup>a</sup> and completely buried					
tanks <sup>o</sup> ) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.					
<b>Oil Storage Container</b> (indicate whether aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (ga	allons)		
Cullen - Elevator Reservoir – A	Hydraulic	110			
Mood – Elevator Reservoir – A	Hydraulic	110			
Fondren Jones #1 – Elevator Reservoir – A	Hydraulic	165			
Fondren Jones #2 – Elevator Reservoir – A	Hydraulic	195			
Smith Library #1 – Elevator Reservoir – A	Hydraulic	75			
Smith Library #2 – Elevator Reservoir – A	Hydraulic	110			
McCombs Center #1 – Elevator Reservoir – A	Hydraulic	165			
McCombs Center #2 – Elevator Reservoir – A	Hydraulic	165			
Fine Arts #1 – Elevator Reservoir – A	Hydraulic	110			
Fine Arts #2 – Elevator Reservoir – A	Hydraulic	75			
Fine Arts #3 – Elevator Reservoir – A	Hydraulic	110			
FW Olin – Elevator Reservoir – A	Hydraulic	110			
Mabee Hall – Elevator Reservoir – A	Hydraulic	110			
Brown Cody – Elevator Reservoir – A	Hydraulic	110			
Robertson #1 – Elevator Reservoir – A	Hydraulic	75			
Robertson #2 – Elevator reservoir – A	Hydraulic	75			
Mundy Hall – Elevator Reservoir – A	Hydraulic	75			
McCombs Center – Loading Dock – A	Kitchen Grease	180			
Physical Plant – yard – A	Diesel Fuel	250			
Physical Plant – yard – A	Gasoline	500			
Tota	al Aboveground Storage Capacity $^{\circ}$	2875 ga	llons		
Total Co	ompletely Buried Storage Capacity	<u>0</u> ga	llons		
	Facility Total Oil Storage Capacity	_2875 ga	llons		

<sup>a</sup> Aboveground storage containers that must be included when calculating total facility oil storage capacity include: tanks and mobile or portable containers; oil-filled operational equipment (e.g. transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

<sup>b</sup> Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

<sup>c</sup> Counts toward qualified facility applicability threshold.

# 2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment <sup>a</sup> is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to paying able waters or adjoining shorelines.	x
The entire secondary containment system, including walls and floor, is capable of containing oil and is	
constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape	
the containment system before cleanup occurs.	

<sup>a</sup> Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge						
Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method <sup>a</sup>	Secondary containment capacity (gallons)	
Bulk Storage Containers and Mobile/Portable	le Containers <sup>®</sup>					
Physical Plant Yard – Diesel	Container rupture, leak, overfill	1 - 250	North	Sized double walled	275	
Physical Plant Yard – Gasoline	Container rupture, leak, overfill	1 - 500	North	Sized double walled	550	
Oil-filled Operational Equipment (e.g., hydra	ulic equipment, transformers) <sup>c</sup>	1				
Campus Buildings Listed in Table G-2	Container leak, spill during filling	1 - 195 each	Campus Map	Curbing/Plugged Drains	Attachment	
Piping, Valves, etc.					•	
na						
Product Transfer Areas (location where oil is	s loaded to or from a container, pipe or	other piece of e	quipment.)	1	1	
Physical Plant Yard – Diesel	Container rupture, leak, overfill	1 - 250	North	Sized double walled	275	
Physical Plant Yard – Gasoline	Container rupture, leak, overfill	1 - 500	North	Sized double walled	550	
Other Oil-Handling Areas or Oil-Filled Equipment (e.g. flow-through process vessels at an oil production facility)						
na						

<sup>a</sup> Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials. <sup>b</sup> For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall

<sup>b</sup> For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

<sup>c</sup> For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

Facility Name: Southwestern University

# 3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Record keeping and Personnel Training	
An inspection and/or testing program is implemented for all aboversund bulk storage containers and piping at	
this facility $[88112.8(c)/6)$ and $(d)(4)$ 112.9(c)(3) 112.12(c)(6) and $(d)(4)$	x
The following is a description of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and/or testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and testing program (e.g. reference to industry standard utilized, scope, frequencies of the inspection and testing program (e.g. reference to industry standard utilized, scope, frequencies of testing program (e.g. reference to industry standard utilized, scope, frequencies of testing program (e.g. reference to industry standard utilized, scope, frequencies of testing program (e.g. reference to industry standard utilized, scope, frequencies of testing program (e.g. reference to industry standard utilize	uencv.
method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at t	this
facility:	
Written tank/container inspection procedure: consists of monthly visual inspection by SPCC and facility trained	d
personnel to look for, report and assign responsibility to correct for : signs of deterioration, discharges or accumula	ations
of oil inside diked areas including tanks, piping, dispenser hoses, fittings, tank/container support and foundations,	
corrosion of tank/container systems and components. Ensure good housekeeping practices are maintained in an	d
around the tank/container area so there is no accumulation of leaves, trash or debris, ensure drain valves/fittings	are
fully closed and capped. Leak conditions should be promptly reported, repaired and "wet oil conditions, oil stainin	g
cleaned up completely. Signs of corrosion should be repaired and re-painted/coaled as necessary. Ensure that secondary containment system (curbing, etc.) are in good condition and canable of preventing oil discharges outs	ide of
containment system prior to clean-up. Inspection logs will be signed and kept on file for a minimum of three years	
gasoline and diesel fuel storage tanks	
Scope/Frequency: monthly to follow written inspection procedures and inspection log checklist	
Method: visual inspections recorded on Inspection log based on inspection standards from STI SP001.	
Personnel: Small Engine Mechanic, back-up Grounds Supervisor	
elevator oil reservoirs	
Scope/Frequency: monthly to follow written inspection procedures and inspection log checklist	
Method: visual inspections recorded on Inspection Log - Attachment 3.1 based on inspection standards from STI	
SP001.	
Method: visual	
Personnel: Kone Elevator employees, back-up Central Plant Operators	
kitchen grease drums	
Scope/Frequency: monthly to follow written inspection procedures and inspection log checklist	
Method: visual inspections recorded on Inspection Log - Attachment 3.1 based on inspection standards from STI	
SP001.	
Personnel: Sodexho employees, back-up HVAC Mechanic for McCombs	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility.	
Records of inspections and tests kept under usual and customary business practices will suffice for purposes of	x
this paragraph. [§112.7(e)]	
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years.	x
[§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]	
Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	x
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges;	v
discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility	^
operations; and, the contents of the facility SPCC Plan. $[\$112./(t)]$	
A person who reports to facility management is designated and accountable for discharge prevention.	х
Name/Title: Joe LePage – Director of Physical Plant	
Discharge provention briefings are conducted for all handling hereennel annually to essure adequate	
understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable	x
discharges or failures, malfunctioning components, and any recently developed precautionary measures	
[§112.7(f)]	
[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]	

Facility Name: Southwestern University

## 4. Security (excluding oil production facilities) §112.7(g):

#### Table G-6 Implementation and Description of Security Measures

Security measures are implemented at this facility to prevent unauthorized access to oil handling, p	processing,	~
and storage area.		X
The following is a description of how you secure and control access to the oil handling processing	and storage a	reas:

I he following is a description of how you secure and control access to the oil handling, processing and storage areas secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

**Gas & Diesel storage tanks:** Physical Plant yard is completely fenced and locked after normal hours. The fuel tanks are in open view of physical plant personnel during normal hours and unauthorized access could be easily noticed and reported to Southwestern University Police. Fuel tank fill pipes are capped and locked when not in use by fuel vendor. Fuel dispensers (pump control) are locked when not in use and power is switched "off" after hours. Keys are given out only to employee requesting fuel from Front Desk, a log of fuel used and record of employee name is also recorded. Security lighting is present which illuminates the fuel storage tanks within the fenced yard. Campus police officer makes nightly rounds across campus. Evening shift Central plant operators visit the Physical Plant approximately every four to eight hours as well. A security camera is also in use that could provide information and identification of unauthorized access.

**Elevator oil reservoirs:** elevator mechanical rooms are locked and require a mechanical room key for authorized personnel including the Kone Elevator personnel. Upon completion of maintenance the Kone Elevator personnel return the mechanical room key back to the Physical Plant. Facilities are generally locked late night after typical student use of the facilities (midnight).

**Kitchen grease:** the kitchen grease container is stored inside the loading dock, Sodexho personnel frequently access the loading dock during working hours, the loading dock doors are closed and locked after working hours. Housekeeping personnel also use this loading dock area for trash disposal day, evening and night shifts. Security lighting is present outside the loading dock.

## 5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):

#### Table G-7 Description of Emergency Procedures and Notifications

The following is a description of the immediate actions to be taken by facility personnel in the event of a **discharge to navigable waters** or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]: <u>this means that oil has entered</u> a drain line (storm drain)

**#1** – Eliminate all potential sources of ignition, sparks, etc. from area. Secure the area to protect people. Provide fire extinguishers near the spill area in case of ignition. Shut down /control source (fuel tank truck) if safe to do so. Use spill control media (socks, pads, granules,) to control spill area and prevent spread of oil spill to storm drains or surface water. Call Physical Plant front desk to notify Director of Physical Plant, AVP for Facilities and Director of Campus Safety to help assess conditions and corrective actions.

**#2** – Inspect storm drain line system manholes following our SPCC campus plans (yellow routes are storm lines – subsurface, blue lines are surface water pathways) to try to determine how far oil has reached. Use a spotlight to help visually inspect for oil sheen – if located, insert oil spill control media (socks) ahead at the next cut-off point (orange cut-off points on campus map) in an effort to prevent oil from reaching Smith Creek.

**#3** – Contact Georgetown Fire Dept. – (911) to report and ask for assistance

**#4** – Assess conditions and prepare and conduct clean-up plan. Use spill control media as well as oil vacuum spill cleanup equipment (located at Central Plant) for in-house oil clean-up projects. Contact oil spill clean-up contractor if needed for a larger more significant oil spill. Clean Harbors Environmental 1-800-645-8265.

**#5** – Director of Campus Safety will call and notify the National Response Center (NRC) at 1-800-424-8802 – after completing attachment #4 – discharge notification form<sup>\*</sup> (for any reportable harmful quantity to navigable waters that would violate water quality standards or cause oil sheen)

\*If oil spill to navigable waters is greater than 1,000 gals or two incidents greater than 42 gals each have occurred in one year Southwestern **must also report to EPA and State of Texas** – see Section 6 for contact information in SPCC plan.

### For spill response to events that do not reach navigable waters (no storm drains) follow step #1.

Spill control media and equipment location:

- 1. located in each elevator mechanical room for elevator oil
- 2. McCombs loading dock for kitchen grease
- 3. Physical Plant warehouse hazardous waste storage area for fuel tanks
- 4. Central Plant extra inventory and oil pump vacuum equipment

NOTE:

Fuel Tank/Container Spill – Minor overspill during fuel filling – assist and clean-up with Tex-Con Oil personnel if safe to do so.

Tank leak or major spill from fuel truck – Call 911 and secure area to protect people. Place spill control media to prevent spread of fuel into retention pond (if safe to do so).

\*Wear appropriate personal protective equipment (gloves, safety glasses, protective suit).

# 6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List				
Contact Organization / Person	Telephone Number			
National Response Center (NRC) – Federal (for any reportable harmful quantity to navigable waters that would violate water quality standards or cause oil sheen)	1-800-424-8802			
Cleanup Contractor(s) Clean Harbors Environmental Houston, TX 77034 (formal contract is not required)	1 (800) 645-8265			
Key Feelity Personnel				
Designated Person Accountable for Discharge Prevention:				
Joe LePage – Director of Physical Plant	512-863-1914 - office			
	512-818-0042 – cell			
Bob Mathis – AVP for Facilities	512-863-1425 – office			
	Emergency: 512-966-4336 – cell			
Michael DeLance – Director of Campus Safety	512-863-1677			
	Emergency: 512-818-0696			
	Office:			
	Emergency:			
State Oil Pollution Control Agencies				
State of Texas Spill-Reporting Hotline and the SERC (State Emergency Reporting Commission)	Spill Reporting:1-800-832-8224			
Other State, Federal, and Local Agencies				
Local Fire Department Georgetown Fire Department	512-930-3473 or 911 for emergency			
Local Police Department Georgetown Police Department	512-930-3510 or 911 for emergency			
Hospital St. Davids Georgetown Hospital	512-943-3000			
Other Contact References (e.g., downstream water intakes or neighboring facilities)				
City of Georgetown Emergency Management	512-930-3510			

## 7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure				
In the event of a discharge of oil to navigable waters or adj in Attachment 4 will be provided to the National Response discharge to navigable waters or adjoining shorelines [See [§112.7(a)(4)]	joining shorelines, the following information identified Center immediately following identification of a Discharge Notification Form in Attachment 4]:	X		
<ul> <li>The exact address or location and phone number of the facility;</li> <li>Date and time of the discharge;</li> <li>Type of material discharged;</li> <li>Estimate of the total quantity discharged;</li> <li>Estimate of the quantity discharged to navigable waters;</li> <li>Source of the discharge;</li> </ul>	<ul> <li>Description of all affected media;</li> <li>Cause of the discharge;</li> <li>Any damages or injuries caused by the discharge</li> <li>Actions being used to stop, remove, and mitigate effects of the discharge;</li> <li>Whether an evacuation may be needed; and</li> <li>Names of individuals and/or organizations who he also been contacted.</li> </ul>	e; the ave		

## 8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve month period

You must submit the following information to the RA:

- (1) Name of the facility;
- (2) Your name;
- (3) Location of the facility;
- (4) Maximum storage or handling capacity of the facility and normal daily throughput;
- (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
- (7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

\* \* \* \* \*

**NOTE:** Section A only applies to Southwestern University.

# A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in \$\$12.8(c)(4) and 112.12(c)(4), listed below. In cases where a provision is not applicable, write "N/A".

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and 112.12(b)(1)]		X
Valves of manual, open-and-closed design are used for the drainage of diked areas. [§§112.8(b)(2) and 112.12(b)(2)]		X
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. [§§112.8(c)(1) and $112.12(c)(1)$ ]	x	
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]	x	
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: $[\$\$112.8(c)(3) \text{ and } 112.12(c)(3)]$		
Bypass valve is normally sealed closed		Х
<ul> <li>Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines</li> </ul>		x
Bypass valve is opened and resealed under responsible supervision		Х
<ul> <li>Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]</li> </ul>		Х
<ul> <li>For completely buried metallic tanks installed on or after January 10, 1974 at this facility [§§112.8(c)(4) and 112.12(c)(4)]:</li> <li>Tanks have corrosion protection with coatings or cathodic protection compatible with local soil</li> </ul>		x
Begular leak testing is conducted		x
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]:		
<ul> <li>Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.</li> </ul>		x
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.21 (6)(12,8(c)(6) and 6112,12(c)(6)(i))	x	
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or		
accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]	X	
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.12(c)(6)(ii)]		X

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Each container is provided with a system or documented procedure to prevent overfills for the container. Describe:	x	
<b>Gas &amp; Diesel tanks:</b> Fuel vendor personnel visually inspect tank and fuel levels with a calibrated dip stick and presets the quantity of fuel to be transferred from the tank truck to help ensure there is no overspill. In the event of an overspill, the tank has a built in seven (7) gallon spill containment bucket designed to capture "overspill" and drain in back into the tank/container. In addition, inside the tank there is a drop tube with a spill limiter/overfill prevention valve, which closes the fill pipe at 90% capacity. Prior to fuel truck starting the fill operation, Southwestern personnel (Small Engine Mechanic or Grounds Supervisor) is responsible to place spill control dike board in front of retention pond drain path to prevent oil/fuel from reaching retention pond in the event of a spill.		
<b>Elevator oil reservoirs:</b> only authorized Kone Elevator personnel hand fill the elevator reservoirs with a 5 gal bucket as needed. Labeled spill control media is readily available inside each elevator mechanical room to promptly clean-up any overspill.		
<b>Kitchen grease drums:</b> authorized personnel from Sodexho (food vendor) manually transfer kitchen grease from small portable containers into the drums which sit inside a secondary containment container. Labeled spill control media is readily available inside the loading dock.		
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]		
Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. [ $\$\$12.8(c)(10)$ and $112.12(c)(10)$ ]	x	
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. [See Inspection Log and Schedule in Attachment 3.1] [ $\S$ 112.8(d)(4) and 112.12(d)(4)]	x	
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]		x

# **ATTACHMENT 1 – Five Year Review and Technical Amendment Logs**

# **ATTACHMENT 1.1 – Five Year Review Log**

I have completed a review and evaluation of the SPCC Plan for this facility, and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility							
Review Date	Plan An	nendment	Name and signature of person authorized to review this				
	Will Amend	Will Not Amend	Plan				
Sept 2016							
Sept 2021							
Sept 2026							
Sept 2031							
Cant 0000							
Sept 2036							

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# ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

	Table G-15 Description and Certification of Technical Amendments							
Review	Description of Technical Amendment	Name and signature of person certifying this						
Date		technical amendment						

## ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist - NOT APPLICABLE

An oil spill contingency plan and written commitment of resources *is required for:* 

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment. NOT APPLICABLE

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written	NI/A
commitment of manpower, equipment and materials required to expeditiously control and remove any quantity	IN/A
of oil discharged that may be harmful is attached to this Plan.	

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Rem           Contingency Plans (§109.5) <sup>a</sup>	ioval
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	
<ul> <li>(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.</li> <li>(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.</li> </ul>	
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	
(2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	
(6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	

<sup>a</sup> The contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

## **ATTACHMENT 3** – Inspections, Dike Drainage and Personnel Training Logs

# **ATTACHMENT 3.1 – Inspection Log and Schedule**

Table G-16 Inspection Log and Schedule           This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and           112.12(d)(4), as applicable.						
Date of Inspection	Container / Piping / Equipment	Describe Scope (or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately <sup>a</sup>	
					X - Use our own inspection logs.	

<sup>a</sup> Indicate in the table above if records of facility inspections are maintained separately at this facility.

# **ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):**

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule						
Container Size and Design Specification	Inspection requirement					
Portable containers (including drums, totes, and intermodal bulk containers (IBC)) <i>McCombs Campus Center – kitchen grease drums</i>	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas					
55 to 1,100 gallons with sized secondary containment <i>Gasoline and diesel tanks</i> <i>Elevator oil reservoirs</i> 1,101 to 5,000 gallons with sized secondary containment and a means of leak detection <sup>a</sup>	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards					
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection <sup>a</sup>	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards					

<sup>a</sup> Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

# ATTACHMENT 3.3 – Dike Drainage Log \* Not Applicable

	Table G-18 Dike Drainage Log								
Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector			

# ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

	Table G-19 Oil-Handling Persor	nnel Training and Briefing Log
Date	Description / Scope	Attendees
Sept. 1, 2011	Training covers components of our site specific SPCC plan, overview of SPCC regulations, preventive inspection procedures and responsibilities, notification procedures in event of a spill, spill response and clean-up procedures, location of spill control media and equipment, storm sewer drainage plans, responsibilities for inspection logs and reporting oil discharges.	See sign-in log attached.

## **ATTACHMENT 4 – Discharge Notification Form**

In the **event of a discharge of oil to navigable waters** or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 7 of the Plan]**:

Table G-20 Information pr	rovided to the National R	esponse Center in the Ev	ent of a Discharge
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-			
Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity	Gallons/Barrols
rype of material discharged		discharged	Gallons/Darreis
Source of the discharge		Media affected	
			Water (specify)
			Other (specify)
Actions taken			
Damage or injuries	□ No □ Yes (specify)	Evacuation needed?	No Yes (specify)
Organizations and individuals	National Response C	Center 800-424-8802 Time	
Contacted	Cleanup contractor (	Specify) Time	
	Facility personnel (S	pecify) Time	
	State Agency (Speci	fy) Time	
	Other (Specify) Time	•	

# Southwestern University Monthly SPCC Plan Inspection Log

Inspector Name:

Signature:

Date:

## Above Ground Storage Tanks: Physical Plant Yard - Diesel and Gasoline Storage Tanks

Inspection Item	Yes	No	NA	Problem Identified	Corrective Action Taken
Is tank exterior structure (secondary containment wall) free of signs of damage, cracks in concrete/steel, free of corrosion and free of fuel discharges?	Yes	No*			
Are piping, hoses, fittings, valves free of signs of leaks and free of signs of damage or deterioration?	Yes	No*			
Tank mounts, support system, foundation floor or ground free of signs of leaks, damage or deterioration?	Yes	No*			
Drain pipes and valves in fully closed position and free of signs of leaks?	Yes	No*			
Water able to drain away from tank foundation to prevent erosion?	Yes	No*			
Venting pipes free of obstructions?	Yes	No*			
Tank openings are properly sealed, capped and locked when not in use?	Yes	No*			
Perform primary tank leak test – remove cap, insert gauge stick into leak detector tube until it strikes the bottom. Remove gauge stick. Is gauge stick free of fuel and/or fuel odors?	Yes	No*			
Good housekeeping routinely maintained in this area so area is free of leaves, trash and debris?	Yes	No*			
Spill prevention (retention pond curb) in good condition and in place prior to fueling and removed immediately after fueling?	Yes	No*			
Are overfill protective devices and procedures implemented during fueling?	Yes	No*			
Spill control media labeled, stored and maintained at or near full inventory levels near tank during fueling?	Yes	No*			

\*Any Yes\* or No\* answer circled indicates the need for a corrective action to fix the problem noted.

### Inspection Log and Schedule

This log is intended to document compliance with \$112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Inspection records are maintained separately at each facility.

# Southwestern University Monthly SPCC Plan Inspection Log

Inspector Name:

Signature:

Date:

**Operational Oil-filled Equipment: Elevator Oil Reservoirs** 

Building: \_\_\_\_\_

Locations Inspected:

Inspection Item	Yes	No	NA	Problem Identified	Corrective Action Taken
				Identified	
Tank structure and support system	Yes	No*			
in satisfactory condition?					
Is the hydraulic oil tank, seams,	Yes	No*			
pad and floor area "free" of signs					
of leaks?					
Drain pipes and valves in fully	Yes	No*			
closed position and free of leaks?					
Is the piping, fittings, etc. for	Yes	No*			
hydraulic oil system "free" of					
signs of leaks?					
Water able to drain away from	Yes	No*			
tank foundation to prevent					
erosion?					
Good housekeeping routinely	Yes	No*			
maintained in this area?					
Secondary containment (curbs) in	Yes	No*			
good condition so that oil					
discharge will not reach drain					
prior to clean-up?					
Spill control media labeled, stored	Yes	No*			
and maintained at or near full					
inventory levels near tank?					

\*Any Yes\* or No\* answer circled indicates the need for a corrective action to fix the problem noted.

## Inspection Log and Schedule

This log is intended to document compliance with \$\$12.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Inspection records are maintained separately at each facility.

# Southwestern University Monthly SPCC Plan Inspection Log

Inspector Name:

Signature:

Date:

## Portable Container – Kitchen Grease drums – McCombs Campus Center Loading Dock

Inspection Item	Yes	No	NA	Problem Identified	Corrective Action Taken
Is primary drum (grease container) free of signs of damage, corrosion, free of signs of oil discharge (leaks)?	Yes	No*			
Is outside of secondary container free of signs of damage, corrosion, leakage in the container or on the ground?	Yes	No*			
Is the inside of the secondary container free of water? If water is present and contaminated with grease, the grease/water needs to be separated prior to drain disposal.	Yes	No*			
Water able to drain away from container bottom or supports to prevent corrosion?	Yes	No*			
Good housekeeping routinely maintained in this area so area is free of leaves, trash and other debris?	Yes	No*			
Spill control media labeled, stored and maintained at or near full inventory levels near tank?	Yes	No*			

\*Any Yes\* or No\* answer circled indicates the need for a corrective action to fix the problem noted.

## Inspection Log and Schedule

This log is intended to document compliance with \$112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Inspection records are maintained separately at each facility.