

# THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

# Huntsville, Alabama

# SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

# **NOVEMBER 2016**

**PREPARED BY:** 

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#### THE UNIVERSITY OF ALABAMA IN HUNTSVILLE HUNTSVILLE, ALABAMA SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

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#### THE UNIVERSITY OF ALABAMA IN HUNTSVILLE HUNTSVILLE, ALABAMA SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

#### FACILITY MANAGEMENT APPROVAL

I, Bryce Morgan, the Facility Environmental Manager have read the Spill Prevention, Control, And Countermeasure (SPCC) Plan; and the SPCC plan has full approval of the Facility Management to be implemented.

**By:**\_\_\_

Date\_

Bryce Morgan Facility Environmental Manager

#### **ENGINEER'S CERTIFICATION**

I do hereby certify that this plan has been reviewed and evaluated in accordance with Code of Federal Regulations Title 40, Part 112 and good engineering practice. This certification in no way relieves the owner or operator from fully implementing such plan in accordance with Part 112.7 as required by the U.S. Environmental Protection Agency.

By:\_\_\_

Date\_

Nasser Amiri, PE Al. Registration No. 21540

### SECTION I PURPOSE AND SUMMARY OF SPCC PROGRAM

#### A. PURPOSE AND SUMMARY OF SPCC PROGRAM

This summary is addressed to Alabama firms, persons, corporations, and other agencies, both public and private, which are likely to be affected by the title regulation. An overview of the regulation is followed by some legalistic detail useful to regulated owners.

The U.S. Environmental Protection Agency published, in the Code of Federal Regulations Title 40, Part 112 (revised July 2002) a regulation entitled "Oil Pollution Prevention" which affects numerous Alabama establishments including farms, businesses, industries, State Agencies and institutions, etc. The purpose of the regulation is to prevent oil spillage into U.S. waters.

The regulation governs premises that are involved in drilling, producing, storing, processing, refining, transferring, distributing, or consuming oil or oil products including vegetable or animal oil. These facilities include those having more than 1,320 gallons total above-ground storage capacity, or those having more than 42,000 gallons below-ground storage capacity. Thus, storage *capacity*, not actual or maximum-expected *inventory*, governs. A facility with one 1,200-gallon tank and no other storage, or with up to 24, 55-gallon drums and no other storage, is exempt from the regulation. The regulations do not apply to facilities which cannot reasonably be expected to discharge oil into or upon U.S. waters.

Briefly, the regulation requires owners or operators of governed facilities to implement and maintain a Spill Prevention Control and Countermeasure Plan (SPCC Plan). The Plan must be reviewed and certified by a licensed professional engineer (P.E.). Additionally, the SPCC Plan must be reviewed and evaluated every five (5) years. The owner/operator of the facility must document completion of the review and evaluation, and must sign a statement whether or not the Plan will be amended. The following statement will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (or will not) amend the Plan as a result."

The SPCC Plan must be amended within six months whenever there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for an oil discharge. P. E. certification is required for any technical amendment to the SPCC Plan.

A copy of the SPCC Plan must be kept at the facility. The Plan need not and should not be sent to the Environmental Protection Agency unless the facility experiences either (a) a single oil spill of more than 1,000 gallons into natural waterways or adjoining shorelines or (b) two oil discharges, more than 42 gallons each, which occur within any consecutive 12-month period. If either of these triggering events occurs, the facility must report the release to applicable local, State and Federal regulators and also submit a spill report along with a copy of the SPCC Plan to EPA Region VII in Atlanta, GA within 60 days.. The UAH OEHS has made verbal agreements with the COH. The requirements for reporting to ADEM locally are provided in Section V.

The SPCC Plan should set forth recent spill history at the facility, the kinds of equipment failure that could occur, the predicted movement and amount of major spillage, appropriate containment and/or diversionary structures or equipment (such as dikes, curbs, barriers, drainage systems, retention ponds, sorbent materials) furnished to prevent discharged oil from reaching waterways, and a spill contingency plan which specifies what steps would be taken in event of oil spillage. Further detail can be found in Section 112.7 of the Regulation.

The SPCC Rules and Purpose are as follows:

Spill Prevention, Control, and Countermeasure rule; Part of the Oil Pollution Prevention regulation (40 CFR part 112)

- Includes requirements for Facility Response Plans (FRPs) for certain facilities which pose a greater threat to waterways and the environment
- Purpose To develop plans designed to prevent oil discharges from reaching the navigable waters of the U.S. and adjoining shorelines

#### **B. DEFINITIONS AND AMPLIFICATIONS**

In these regulations, an oil spill is a discharge of oil, no matter how small, into U.S. waters. U.S. waters are the natural surface watercourses, no matter how small or how modified by man, of the United States. Oil spillage on land does not become an oil spill unless and until the oil reaches a waterway.

Oil, as defined in Section 311 (a)(1) of the CWA, can be of any kind or in any form including, but not limited to

- Petroleum and non-petroleum based oils
- Crude Oil
- Refined Products
- Animal Fats, and
- Vegetable oils

Applicability of the Regulation is determined by oil storage capacity, not oil inventory. Only containers of oil with a capacity of 55-gallons or greater are counted in the capacity determination. Oil filled electrical, operating, or manufacturing equipment is not considered an above ground storage containers unless the oil reservoirs are greater than 55 gallons. Empty drums on hand, awaiting pick- up for discard or return to vendor, are not reasonably included.

Plan formulators should closely read Section 112.7, noting that "shall" and "must" provisions are mandatory; "should" provisions are discretionary, not required.

Legalisms are unavoidable wherever any regulation is concerned and owners subject to this Regulation need to be aware of them in their own self-interest. However, owners are encouraged to hold in mind the Regulation's purposes: to prevent oil spills and to be prepared for effective action if spillage does occur. An owner who accomplishes these goals need not worry whether he has inventoried every quart of oil on his premises or has provided every known protective measure in his Plan. Conversely, exempt owners having appreciable oil storage are encouraged to use proper preventive measures and to adopt a good contingency plan notwithstanding their exemption.

The SPCC Rule requires Containment and procedures to *prevent* oil discharges; Proactive *Control* measures to keep an oil discharge from entering navigable waters of the U.S. and adjoining shorelines (containment); and Effective *Countermeasures* to contain, clean up, and mitigate any oil discharge that affects navigable waters of the U.S. and adjoining shorelines (spill response measures).

Navigable Waterways of the U.S. and Adjoining Shorelines:

• Applicability of the SPCC rule is predicated on a reasonable threat of discharge of oil to "navigable waters of the U.S. and adjoining shorelines"

Navigable waters of the U.S. are

- Surface waterways streams, creeks, rivers, lakes
- Wetlands adjacent to a navigable waterway
  - Nexus important
- Can be intermittent streams. Best determination if flowing at least seasonally (3 months or more), depending on several factors (see Rapanos Guidance) http://www.epa.gov/owow\_keep/wetlands/guidance/CWAwaters.html
- Defined flow pathway to truly navigable waters of the U.S. good start in determination don't assume

Reasonable Expectation of an Oil Discharge is as follows:

- Initial determination by the owner/operator based on geographical and location aspects.
- Proximity to water, land contour, drainage
- Exclude manmade features, such as secondary containment dikes around tanks and impoundments, in determination
- Good idea to document determination
  - Particularly if you conclude you are not subject to the rule
  - Not a rule requirement

Facility- any mobile or fixed, onshore or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used, as described in Appendix A to this part. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and types of activity at the site. Contiguous or non-contiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.

Permanently closed: Permanently closed means any container or facility for which:

- (1) All liquid and sludge has been removed from each container and connecting line; and
- (2) All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is permanently closed and noting the date of closure.

Definition of "permanently closed" does not require a container to be removed from a facility.

- Permanently closed containers may be brought back into use as needed for variations in production rates and economic conditions.
- Permanent closure requirements under the SPCC rule are separate and distinct from the closure requirements in regulations promulgated under Subtitle C of RCRA.

- SPCC rule exempts any oil storage container that is permanently closed.
   A tank that has either never stored oil, or has been permanently closed, and arrives at a facility is not counted until the tank is actually used to store oil.

## **SECTION II**

## APPLICABILITY AND CONFORMANCE

#### SECTION II APPLICABILITY AND CONFORMANCE A. APPLICABILITY:

The University of Alabama in Huntsville Campus in Huntsville, Alabama is subject to the requirements of 40 CFR 112. The facility is a non-transportation related, onshore facility engaged in storing and consuming oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, into or upon the navigable waters of the United States or that may affect natural resources belonging to the United States. More than 1,320 gallons above ground and more than 42,000 gallons underground of oil are stored at the subject site.

#### **B. CONFORMANCE AND DEVIATIONS**

This SPCC Plan was developed for the University of Alabama in Huntsville campus in Huntsville, Alabama following the requirements of Part 112.7 General Requirements for Spill Prevention, Control and Countermeasure Plans and Part 112.8 Spill Prevention, Control and Countermeasure Plan Requirements for Onshore Facilities. Any deviations from specific regulatory requirements are addressed in the following table.

With the preparation and full implementation of this SPCC Plan, the University of Alabama in Huntsville campus in Huntsville, Alabama will be in substantial compliance with the requirements of 40CFR, Partll2.

A cross-reference table with 40 CFR 112 specific requirements and the location where addressed in this document is presented below.

## **SECTION III**

## GENERAL FACILITY DATA

#### SECTION III GENERAL FACILITY DATA

#### A. FACILITY DESCRIPTION

| 1. COMPANY NAME:                | University of Alabama in Huntsville          |
|---------------------------------|--|
| MAILING ADDRESS:                | 301 Sparkman Drive                           |
|                                 | Huntsville, Alabama                          |
| TELEPHONE:                      | (256) 824- 2171                              |
| FACSIMILE:                      | (256) 824-6668                               |
|                                 | Bam0027@uah.edu                              |
| UNIVERSITY PRESIDENT:           | Dr. Robert A. Altenkirch                     |
| A.V.P. FACILITIES & OPERATIONS: | Mark Cowherd                                 |
|                                 | CowneardF@uah.edu                            |
|                                 |  |
| FACILITY ENVIRONMENTAL          |  |
| MANAGER:                        | Bryce Morgan                                 |
| 2. FACILITY OPERATION:          | Hours of operation varies in each individual |
|                                 | building, depending on class schedule and    |
|                                 | time of year.                                |
| <b>B. FACILITY LOCATION</b>     |  |
| 1, SITE ADDRESS:                | 301 Sparkman Drive                           |
|                                 | Huntsville, Alabama                          |
|                                 |  |
| 2. LOCATION MAP:                | See Exhibit No. 3                            |
|                                 |  |

#### C. PHYSICAL LAYOUT AND OIL STORAGE LOCATIONS

A general site plan diagram showing the physical layout and the oil storage locations within the facility are presented as Exhibit 4.

#### **D. FACILITY SECURITY AND LIGHTING**

The UAH campus is generally open to the public. All areas where valves, pumps, or other control devices are located are secured by doors or gates that are kept locked when not m use by authorized personnel.

Sufficient lighting is provided throughout the facility to allow for the visual discovery of spills that could occur at any time during any 24-hour period.

#### E. BULK STORAGE CONTAINER DESIGN

Above ground bulk liquid storage containers at this facility consist of painted steel tanks containing diesel fuel. The materials and construction of the liquid storage containers are

compatible with the materials stored and the conditions of storage such as temperature and pressure.

#### SECTION III GENERAL FACILITY DATA

SPCC regulatory requirements for secondary containment and storm drainage control measures are met with impermeable containment structures that provide adequate secondary containment. All bulk storage containers at the facility are manually filled and continually visually monitored during filling operations. Therefore, SPCC regulatory requirements for high level alarms and/or high level liquid pump cutoff devices are not required at this facility.

#### F. BULK STORAGE CONTAINER TESTING PROCEDURES

#### 1. VISUAL INSPECTION

A number of bulk storage tanks are located at the facility. All sides of each bulk container are visible for inspection and any leakage or spillage would be noticeable almost immediately on the concrete floor or storage pad. Additionally, routine safety and housekeeping inspections are conducted in all areas of the facility, including oil storage areas.

Conduct regular inspections of all aboveground valves, piping, and appurtenances

Assess general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces

Conduct integrity and leak testing of buried piping at time of installation, modification, construction, relocation, or replacement

#### 2. BULK CONTAINER TESTING

SPCC regulations require regularly scheduled integrity testing of each above ground container, regardless of size. The frequency and type of testing must consider the container size and design (such as floating roof, skid-mounted, elevated, or partially buried). Visual inspection must be combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, or another system of non-destructive testing.

All regulated aboveground bulk storage tanks shall undergo periodic integrity testing listed above. This testing shall be performed not less than once every 3 years. Records of this tank testing shall be kept in Exhibit No. 7.

Underground storage tanks located at the facility must be regularly leak tested. Inventory control will be utilized to provide leak detection for all underground storage tanks.

#### 3. VALVE AND PIPING

Valving and piping shall undergo visual inspection for corrosion and leaks. Other content loss control measures should include inventory records.

#### G. HISTORY OF ON-SITE SPILL INCIDENTS

There have been no reportable spill incidents within the last three years at the University of Alabama in Huntsville campus in Huntsville, Alabama.

## **SECTION IV**

## POTENTIAL POLLUTION SOURCES, AREAS, CONTAINMENT FACILITIES, AND DRAINAGE PATTERNS

#### SECTION IV POTENTIAL POLLUTION SOURCES, AREAS, CONTAINMENT FACILITIES, AND DRAINAGE PATTERNS

#### A. POTENTIAL POLLUTION SOURCES

| GOUDGE   | DECONTION  | BEST MANAGEMENT   |
|----------|--|---|
| SOURCE   | DESCRIPTION  | PRACTICES   |
| Source 1 | Underground Storage Tanks<br>5000 gal. diesel fuel Engineering Bldg<br>emergency generator tank<br>2500 gal. diesel fuel Library C (old)<br>emergency generator tank<br>2000 gal. unleaded gasoline physical plant<br>Tank (Overflow Protection)<br>1000 gal. diesel fuel physical plant tank<br>10000 gal. diesel fuel Roberts Hall<br>emergency generator tank<br>5000 gal. diesel fuel University Center<br>emergency generator tank<br>8000 gal. diesel fuel Von Braun Research<br>Hall emergency generator tank   | <ul> <li>Leak detection by integrity control or automatic gauging equipment</li> <li>Check all piping, valves and nozzles at regular intervals for leaks</li> <li>Continuously monitor the tank filling operations</li> <li>Have absorbent material on hand for immediate spill clean-up</li> </ul>   |
| Source 2 | Above Ground Storage Tanks<br>800 Gal. Diesel Fuel; Nursing Building<br>6,000 Gal. Diesel Fuel; Central Plant<br>800 gal diesel fuel Central Plant<br>800 gal. diesel fuel Cramer Hall (annex)<br>600 gal. diesel fuel Cramer Hall (weather)<br>300 gal. diesel fuel Cramer Hall (computer)<br>180 gal. diesel fuel Technology Hall<br>500 gal. diesel fuel Von Braun Research<br>Hall<br>500 gal. diesel fuel Shelby Center<br>Intermodal (capacity unknown)<br>180 gal. diesel fuel Business Admin.<br>Building<br>300 gal. diesel fuel Wilson Hall<br>250 Gallon; Spragin Hall; Day Tank. | <ul> <li>Continuously monitor the filling of the tanks</li> <li>Periodically inspect the tank integrity and check for leaks</li> <li>Check all nozzles and valves after each use and at other regular intervals for closure and leaks</li> <li>Verify that there are no leaks from loading equipment</li> <li>Have absorbent material on hand for immediate spill clean-up</li> </ul> |
| Source 3 | Electrical Transformers  | Periodic inspection of the  |
|          |  | transformer   |
|          | 200 gal. Administrative Bid. transformer   | Have absorbent material on hand   |
|          | 416 gal. Bevel Center transformer  | in the area for immediate spill   |
|          | 141 gal. Business Center transformer   | clean-up  |

|          |   | BEST MANAGEMENT                              |
|----------|---|--|
| SOURCE   | DESCRIPTION   | PRACTICES                                    |
|          | Electrical Transformers                             | • Leak detection by integrity                |
| Source 3 | 172 gal- Central Campus Residence Hall T-I          | control or automatic                         |
|          | transformer   | gauging equipment                            |
|          | 172 gal. Central Campus Residence Hall T-           | • Check all piping, valves                   |
|          | 11 transformer                                      | and nozzles at regular                       |
|          | 140 gal. Central Receiving transformer              | intervals for leaks                          |
|          | 416 gal. Cramer Hall (side) transformer             | <ul> <li>Continuously monitor the</li> </ul> |
|          | 425 gal. Cramer Hall (front) transformer            | tank filling operations                      |
|          | Est. 200 gal. Credit Union transformer              | Have absorbant material on                   |
|          | 200 gal. Engineering Bid. transformer               | • Have absorbent material of                 |
|          | 538 gal. Fitness Center transformer                 | aloon up                                     |
|          | 300 gal. Johnson Research Center                    | clean-up                                     |
|          | transformer   |  |
|          | 164 gal. Library Phase I transformer                |  |
|          | 538 gal. Library Phase n transformer                |  |
|          | 34/ gal. Madison Hall transformer                   |  |
|          | 357 gal. Morton-Hall-n transformer                  |  |
|          | 225 gai. North Campus Residence Hall I              |  |
|          | 173 gal North Campus Residence Hall H               |  |
|          | transformer   |  |
|          | 300 gal Nursing Building transformer                |  |
|          | Est. 100 gal. Physical Plant transformer            |  |
|          | Est. 500 gal. Roberts Hall transformer              |  |
|          | Est. 250 gal. Shelbie King Hall transformer         |  |
|          | 74 gal. Southeast Housing Bid. 600 transformer      |  |
|          | 89 gal. Southeast Housing Bid. 604 transformer      |  |
|          | 89 gal. Southeast Housing Bid. 608 transformer      |  |
|          | Est. 89 gal. Southeast Housing Bid. 700 tranf.      |  |
|          | Est. 89 gal. Southeast Housing Bid. 704 transformer |  |
|          | 538 gal. Spragins Hall (back) transformer           |  |
|          | 1408 gal. Spragins Hall (tennis court) transformer  |  |
|          | 480 gal. Technology Hall (east) transformer         |  |
|          | 140 gal. Technology Hall (west) transformer         |  |
|          | 366 gal. University Center transformer              |  |
|          | Est. 250 gal. VonBraun Research Institute           |  |
|          | transformer   |  |
|          | 205 gal. Wilson Hall transformer                    |  |
|          | Shelby Center for Science and Technology (Capacity  |  |
|          | NA)   |  |
|          | Charger Village (Capacity NA)                       |  |
|          | Example $(Capacity NA)$                             |  |
|          | SWIRLL Facility                                     |  |
|          | Nursing Building                                    |  |
|          | Greenway/Student Services                           |  |
|          | Charger Union                                       |  |
|          | Charger Village                                     |  |
|          |   |  |

#### SECTION IV POTENTIAL POLLUTION SOURCES, AREAS, CONTAINMENT FACILITIES, AND DRAINAGE PATTERNS

| COUDCE   |   | BEST MANAGEMENT                                |
|----------|---|--|
| SOURCE   | DESCRIPTION                                 | PRACTICES                                      |
| Source 4 | Elevator Hydraulic Tank                     | <ul> <li>Periodic inspection of the</li> </ul> |
|          |   | transformer                                    |
|          | 115 gal. Administrative Science elevator 1  | • Have absorbent material on                   |
|          | 115 gal. Administrative Science elevator 2  | hand in the area for                           |
|          | 73 gal. Bevel Center elevator 1             | immediate spill                                |
|          | 73 gal. Bevel Center elevator 2             | clean-up                                       |
|          | 112 gal. Engineering Bid. elevator          |  |
|          | 116 gal. Environmental Bid. elevator        |  |
|          | 120 gal. Library Phase I elevator 1         |  |
|          | 147 gal. Library Phase n elevator 2         |  |
|          | 91 gal. Library Phase HI elevator 3         |  |
|          | 155 gal. Madison Hall elevator              |  |
|          | 197 gal. Material Science elevator          |  |
|          | 82 gal. NSSTC elevator 1                    |  |
|          | 82 gal. NSSTC elevator 2                    |  |
|          | 89 gal. Nursing Bid. elevator               |  |
|          | 173 gal. Optics Bid. Elevator 1             |  |
|          | 173gal. Optics Bid. Elevator 2              |  |
|          | 228 gal. Optics Bid. Elevator 3             |  |
|          | 109 gal. Research Hall elevator             |  |
|          | 163 gal. Residence Hall elevator 1          |  |
|          | 163 gal. Residence Hall elevator 2          |  |
|          | 163 gal. Residence Hall elevator 3          |  |
|          | 159 gal. Technology Hall elevator           |  |
|          | 115 gal. University Center elevator 1       |  |
|          | 119 gal. University Center elevator 2       |  |
|          | 102 gal. University Fitness Center elevator |  |
|          | 108 gal. WilsonHall elevator                |  |
|          | Shelby Center for Science (Capacity NA)     |  |
|          | Intermodal Facility (Capacity NA)           |  |
|          | 2 Tanks, each 100 Gal. Charger Village      |  |
|          |   |  |

#### SEE EXHIBIT 4b FOR LOCATIONS

#### **B. CONTROL AND CONTAINMENT FACILITIES**

|        |              | BEST MANAGEMENT PRACTICES  |  |
|--------|--------------|--|--|
| SOURCE | DESCRIPTION  |  |  |
| 1      | USTs         | Not Applicable for Underground Storage   |  |
|        |              | Tanks  |  |
| 2      | ASTs         | Central Plant AST has concrete containment<br>capable of holding<br>100% of the tank and anticipated rainfall. The<br>other ASTs have<br>integrated outer shells which provide<br>secondary containment. |  |
| 3      | Transformers | None.  |  |
| 4      | Elevators    | Secondary containment provided by the  |  |
|        |              | buildings or elevator shaft  |  |
|        |              | the hydraulic system is located in   |  |

#### C. DRAINAGE AND RUNOFF DATA

Runoff from the University of Alabama in Huntsville Campus is received by drainage ditches or the underground storm water collection system. The storm water is directed to the pond on the west side of the campus and is eventually received by McDonald Creek. Should a release enter the storm water collection system it could most likely be held within the pond before to leaving the site.

# D. DETAILS CONCERNING POTENTIAL POLLUTION SOURCES AND FAULT ANALYSIS

The storage facilities at which receiving, unloading and handling occur and the existing containment and control practices at University of Alabama in Huntsville Campus are described as follows:

| SOURCE | DESCRIPTION  |
|--------|--------------|
| 1      | USTs         |
| 2      | ASTs         |
| 3      | Transformers |
| 4      | Elevators    |

**Source 1** is the underground storage tanks (USTs) located on the site. Nine regulated USTs are located throughout the campus ranging in size from 1000 to 10000 gallons.

Worst case - The worst case scenario would be a release from the 10,000 gallon diesel fuel tank at Roberts Hall. The released material would be absorbed into the ground. A release from any of the facility's USTs is not expected to result in an impact to surface water. If a spill occurs, the Emergency Coordinator should be notified, and all procedures specified in the Contingency Plan shall be followed.

**Source 2** is the aboveground storage tanks (ASTs) located on the site. Nine regulated ASTs are located throughout the campus ranging in size from 180 to 800 gallons. Each of the tanks has secondary containment cable of holding greater than 100% of the tank contents.

Worst case - The worst case scenario would be full Central Plant or Cramer Hall diesel fuel tank failure, releasing the total contents of one of the tank (800 gallons). The entire contents of the tank would be held within the secondary containment. If a spill occurs, the emergency coordinator should be notified, and all procedures specified in the Contingency Plan shall be followed.

**Source 3** is the electrical transformers located on the site. Thirty-eight (38) regulated oilcontaining electrical transformers are located throughout the campus. The transformers are generally located in open areas with no secondary containment.

Worst case - The worst case scenario would be the failure of the largest transformer (Spragins Hall -tennis court) releasing the entire contents of the transformer to the surrounding ground surface. The catastrophic failure of this nature would cause a power failure immediately notifying campus personnel that there may be a problem with the transformer. The released material would likely pool on the ground surrounding the transformer. The power failure would provide immediate notification of the release and allow appropriate campus personnel to respond. If a spill occurs, the emergency coordinator should be notified, and all procedures specified in the Contingency Plan shall be followed.

**Source 4** is the elevator hydraulic units located on the site. Thirty (30) regulated hydraulic units are located throughout the campus. Each of these units are located in mechanical rooms or elevator shafts within campus buildings. These room and elevator shafts provide sufficient secondary containment to hold 100% of the unit's capacity.

Worst case - The worst case scenario would be the failure of one of the facility's hydraulic units, releasing the entire contents. The entire contents of the hydraulic unit would be held within the building where it could be cleaned up. If a spill occurs, the emergency coordinator should be notified, and all procedures specified in the Contingency Plan shall be followed.

# E. CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

If the facility does not meet the substantial harm criteria listed in Attachment C-I to Appendix C of 40 CFR Part 112, the owner or operator shall complete and maintain at the facility a certification of the applicability of the substantial harm criteria form. A signed Certification Form is presented as Exhibit 1.

#### F. RISK SUMMARY

The University of Alabama in Huntsville Campus has a low risk for spills to occur and run offsite. The major areas for potential environmental releases to occur would be the aboveground storage tanks. Each of these sources is equipped with secondary containment. Unloading operations are carefully monitored to prevent a major release if a spill or leak occurs and to ensure that it will be contained and cleaned up quickly.

## **SECTION V**

## **CONTINGENCY PLAN**

#### SECTION V CONTINGENCY PLAN

#### A. RESPONSIBILITIES

Oils are used throughout The University of Alabama in Huntsville. Oils include petroleum products, vegetable oils, hydraulic and mineral oils, etc. Through their use, or through the use of oil-containing machinery and equipment, the potential exists to release oil to the environment.

This document summarizes spill/release clean-up and reporting requirements for these materials. Everyone is responsible for spill prevention, reporting, and sometimes, clean-up. Through the use of good handling procedures, we can minimize risk to ourselves, others, and the environment. If UAH has spills or other releases, they must be reported to the proper regulatory agencies. Environmental Health and Safety (EHS) performs all regulatory notifications, and ensures that the environmental cleanup meets the regulatory requirements and standards. Anyone that causes a spill/release is responsible for cleaning up the spill/release or for ensuring that others perform the clean-up. Anyone that comes across an unattended or orphaned spill/release is responsible for reporting that spill/release to a responsible party for clean-up and/or to EHS. If Environmental Health and Safety is called when a spill/release occurs (see When to Report), they will provide oversight, assistance and/or clean-up, depending on the material and/or quantity. EHS also has spill control materials and protective clothing available that can be used in the event that a spill or release cannot be controlled by the materials on site.

#### When to Report

When deciding whether a spill release must be reported to EHS, the first consideration is whether it can reach surface waters (storm water drains, streams, channels, ditches, etc.). Any spill/release to surface waters must be reported immediately, no matter what the quantity. In addition, spills/releases of oil containing materials must be reported to EHS if they exceed one quart with the exception of spills/releases that are confined to areas inside buildings that do not have floor drains. Spills/releases of less than one quart must be cleaned up immediately.

For spills/releases that threaten the environment and cannot be readily handled by the facility, the initial notification should be made to the Office of Public Safety at 6911. Please make sure that someone remains near the scene to provide information to the responders.

#### **B. SPILL NOTIFICATION PROCESS**

1. Any employee observing a spill of oils or any related material of any quantity no matter how small that may come into contact with any natural surface water course, is required to first take immediate action to contain the spill by placing absorbent material around the spill or by diking of drains. Specific procedures for each source are included in Section IV and general procedures are included in part D of this section. This operation should only be carried out without jeopardizing an employee's safety or the safety of other employees. After action is taken to contain spill the employee is to notify his immediate supervisor, the Department of Public Safety, and provide the information outlined below (#2).

2. For each spill, written documentation of the spill is required. The following information is to be included in this documentation:

- a) Date and time of spill (actual/discovered)
- b) Area where spill occurred
- c) Type of spill (oil, lubricant, etc.)
- d) Estimated volume
- e) Did any spill leave the property?
- 1). If so, where was it discharged?
- f) i^^ ^e dit?into which the spm has> or ^yente^

i; suspected failure that caused spill

- g) Assessment of imminent danger to personnel or property
- n) Damage and injuries caused by spill
- i) Actions taken to contain, stop, remove or cleanup spill
- J) Identification of any local emergency unit(s) contacted

#### 3. Department of Public Safety Shall:

Send police unit to assist in securing the area

Contact Environmental Health and Safety (E.H.S.) primary or secondary contact as listed

| Name          | Title                                | Telephone             |
|---------------|--------------------------------------|-----------------------|
| Bryce Morgan  | Director of Environmental Health and | 256 824 6053 (office) |
|               | Safety Manager                       | 256 275 5071 (mobile) |
|               | (Emergency Coordinator)              |                       |
| Christy Olive | Chemical Hygiene Officer             | 256 824 2171 (office) |
| -             |                                      | 256 335 3425 (mobile) |

Contact Facilities Director, James Davis at 256 824 6482

NOTE: All home phone and cell phone numbers for the above listed personnel are on file with police dispatch.

NOTE: If E.H.S personnel cannot be contacted:

Call CleanHarbours Environmental Services for spill response.

The listing below provides venders, response companies and agencies that may be required during a release and clean up of an oil spill. The E.H.S. office will normally contact these companies. These numbers are provided as additional information to ensure that an appropriate response is coordinated between the University police and Facilities and Operations personnel in the event that EHS personnel in not available.

| Stericycle                          | 256) 552-0625 |                           |
|-------------------------------------|---------------|---------------------------|
| Huntsville Fire Department (HazMaT  | 256-851-4022  | Main Desk                 |
| Response)                           |               |                           |
| Grainger (spill supplies)           | 256-830-2150  |                           |
| Robins Rents                        | 256-883-9312  |                           |
| Alabama Department of Environmental | 334-271-7700  | Spill Notification Office |
| Management                          |               |                           |
| Huntsville Hospital                 | 256 265 8133  | Emergency Room            |
| HEMSI-Ambulance                     | 256-722-7158  | Dispatch Center           |

#### **Contacts, Vendors and Agencies**

#### 4. Environmental Health and Safety Shall:

- Further evaluate the spill, and determine the appropriate measures to take in accordance with the Environmental Protection Agency (EPA) and Alabama Department of Environmental Agency (ADEM) regulations and Guidelines.
- Contact Regulatory Agencies when required.

#### **Regulatory Agency Notifications**

A spill or release of oil that exceeds the EPA Contingency Plan Oil and Hazardous Materials List reportable quantity (RQ) (RQ for oil is 10 gallons) in a 24-hour period and enters the environment must be reported to ADEM within designated time limits. For spills or releases exceeding 10-gallons in a 24-hour period, this notification must be made with 2 hours of spill/discovery. During business hours, call the ADEM Spill Reporting Hotline at (334) 271-7700. After hours follow the voice mail instructions or cal1 the Capital Police at (334) 242-0700.

**In the event of a spill of any body of water**, the UAH policy is to **immediately** inform the ADEM of the location of the spill as much as is known of the extend of the situation. The Director of the Office of Environmental Health and Safety and the Hazardous Materials Specialist must respond in a timely manner and perform the reporting requirements included this Plan.

The following table summarizes reporting requirements for oil spills that impact surface waters of United States:

| Substance | Quality impacting waters of the U.S.          | EPA Reporting<br>required | State or local reporting requirements |
|-----------|---|---------------------------|---------------------------------------|
| Oil       | > 1,000 gallons single<br>event               | Yes                       | No                                    |
|           | 42 gal./ two events in any<br>12 month period | Yes                       | No                                    |

EPA reporting is not required for an oil spill less than 1,000 gallons for a single event or less than 42 gallons in each of two events within a 12 month period or for an oil spill that does not flow off-site or otherwise impact the surface waters of the United States. This plan outlines specific agreements UAH has with state and local regulators. Any oil spill must be cleaned up immediately to eliminate the potential for contact with storm water that could transport oil contamination to impact the waters of the United States.

All other oil and/or chemical spills shall be reported to the appropriate local, state and federal agencies listed below as required.

| Agency  | Location            | Telephone           |
|---|---------------------|---------------------|
| National Response Center                          | Washington, D.C.    | (800) 424-8802      |
| Huntsville Fire Department<br>(HazMat Response)   | Huntsville, Alabama | 256 851 4022<br>911 |
| Alabama Department of<br>Environmental Management | Montgomery, Alabama | 334 271 7700        |
| Huntsville Police Department                      | Huntsville, Alabama | 911                 |

#### ADEM.

A spill or release of oil that creates a sheen on a surface water or that exceeds the EPA Contingency Plan for Oil and Hazardous Materials List reportable quantity (RQ) of 10 gallons in a 24-hour period and enters the environment must be reported to the Alabama Department of Environmental Management. For spills or releases resulting in a sheen or exceeding 10-gallons in

a 2-hour period, this notification must be made within 2 hours of the spill/release discovery.

- a. During business hours: (334) 271-7700
- b. After hours call the Capital Police at: (334) 242-0700

#### City of Huntsville

If it is anticipated that an oil spill or release exceeding the RQ may result in a discharge to the sanitary sewer system in the metro Huntsville area, the City of Huntsville Water Pollution Control office must be notified of the release.

a. During normal business hours:

Pat Morgan: (256) 883-3756

b. After hours: COH - Wastewater Operator on Duty (256) 883-3666

#### SECTION V CONTINGENCY PLAN

If it is anticipated that an oil spill or release exceeding the RQ may result in a discharge to any surface waters or navigable water ways in the metre Huntsville area, the City of Huntsville Department of Natural Resources and Environmental Management should be provided a courtesy notification of the release.

a. During normal business hours:

#### DannyShea (256)427-5750

#### C. SPILL CONTROL AND CONTAINMENT EQUIPMENT INVENTORY

Maintenance area and laboratories with the potential for oil leaks and spills shall be equipped with spill absorbent materials which may include absorbent pads, absorbent booms or socks mops shovels, brooms, and loose absorbent material for cleanup of spills.

#### **D. PROCEDURES FOR CONTAINMENT AND CLEANUP**

In the event of an oil spill incident, regardless of size or scope, the employee who discovers the spill should take the immediate actions:

1. If any person is injured, contact the local emergency service for assistance.

2. Locate the source of spill.

3. Try to stop and/or contain the spill or leak by using absorbent material to contain the spill or by plugging drains without jeopardizing his or her safety.

4. Notify the appropriate supervisor.

The appropriate supervisor, after being notified, will investigate the spill and take the following actions:

1. Organize the appropriate employees to start procedures for containment and cleanup of the spill.

2. The spill response team will act immediately to prevent the spill from leaving the facility property via floor drains and drainage ditches.

3. Clean up residual spills by using absorbent material mops, brooms, etc. Large spills should be pumped into spare tanks, empty drums or vacuum trucks (if available). A licensed waste disposal contractor should be contacted for proper disposal and/or recycling of liquid and absorbent wastes, when necessary.

4. Provide appropriate information to the Environmental Manager.

When the Supervisor has the appropriate clean-up operations in progress, he shall then notify the Emergency Coordinator to provide information on what has happened and what actions are in progress to stop, contain, and clean-up the spill.

#### **E. CORRECTIVE ACTIONS**

After the spill has been cleaned up and the material disposed of properly the Emergency Coordinator plant supervisors and any other appropriate personnel shall thoroughly inspect the cause of the spill and take the necessary actions to correct the problem. Additional preventative measures shall also be evaluated, and implemented as necessary. A written report noting the date, what repairs were performed, who made the repairs and test(s) performed after the repairs, were made to verify the problem has been corrected, will be maintained with this plan.

#### F. SPILL REPORT RECORD

A written report of reported spill information and all actions taken to contain and cleanup the spill shall be prepared and maintained on-site with the SPCC Plan. If required, a copy of the report will be sent to the relevant Federal (EPA Regional Administrator), State and local agencies.

Federal regulations require that a facility discharging into navigable waters more than 1000 gallons of oil in a single event, or two discharges (over 42 gallons) of oil in any 12 month period to file a spill event report with the EPA Regulation Administrator, State, and local agencies in charge of water pollution control activities within 60 days, providing the following information:

- 1. Facility name and address
- 2. Owners name and address
- 3. Facility location
- 4. Date and year of initial facility operation
- 5. Maximum facility storage or handling capacity and normal daily throughput
- 6. Facility description, including maps, flow diagrams and topographical maps

7. A complete copy of the SPCC Plan with any amendments

8. Spill causes(s), including a failure analysis of system or subsystem in which failure occurred.

9. Corrective actions and countermeasures taken, including an adequate description of equipment repairs or replacement.

10. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.

11. Other information required by the Regional Administrator as reasonably pertinent to the plan or spill event.

## **SECTION VI**

# PERSONNEL TRAINING AND USE OF THE SPCC PLAN

#### SECTION VI PERSONNEL TRAINING AND USE OF THE SPCC PLAN

#### A. PERSONNEL TRAINING

It is critical that all oil handling employees are familiar with the requirements of the Spill Prevention Control and Countermeasure Plan. To accomplish this, the following procedures shall be considered and implemented:

1. All managerial and supervisory personnel are required to read, and be conversant with, the contents of the SPCC Plan and the impact if a spill occurs.

2. All oil handling employees are to be familiar with:a) The requirement for reporting all spills to their supervisor.b) The Contingency Plan.c) The materials available for control and clean-up of spills

3. A meeting of managerial and supervisory personnel to discuss the "Spill Prevention Control and Countermeasure Plan" should be held annually to evaluate the "Plan" and make recommendations for revisions.

4. To keep Spill Prevention a high priority issue, short meetings should be held at regular intervals at least annually to "update" the Plan and to instruct any new employees of the requirements.

5. The date and those in attendance at each "SPCC Plan" meeting should be recorded and those records kept with the "SPCC Plan."

#### **B. SPILL PREVENTION PROCEDURES TRAINING**

All appropriate oil handling personnel are to be properly instructed in the following items:

1. Equipment operation and maintenance to prevent water pollutant discharges-Each oilhandling employee is to be re-instructed annually in the prevention of accidental releases or discharges of water pollutants. New oil-handling employees are to be given training in spill prevention procedures and emergency response procedures before starting work at the facility as appropriate.

2. All oil handling employees are to be aware that applicable pollution control laws, rules and regulations have been considered in development of the training provided.

3. All oil handling personnel are to be specifically instructed periodically on the contents of this SPCC Plan. The Director of Environmental Health and Safety is accountable for all spill prevention measures. As part of its standard facility operating procedures, UAH employees are to be instructed to be observant for signs or evidence of deterioration, leaks, or accumulation of oil and other regulated materials during their normal daily routine. They are required to immediately report any problems that they find to their supervisor and begin corrective action in accordance with the SPCC plan, other facility plans and good, safe practices.

Scheduled prevention briefings for the appropriate personnel are required at least once annually to assure adequate understanding of the SPCC Plan. During these meetings, personnel are to be re-instructed on the proper operation and maintenance of facility equipment. A copy of the "Personnel Response Training Log" is presented in Exhibit 8. Personnel training records must be maintained at the facility for a minimum of three years.

## SECTION VII INSPECTION AND RECORDS

#### SECTION VII INSPECTION AND RECORDS

#### A. GENERAL INSPECTION CHECKLIST AND SCHEDULE

Written inspection checklists and schedules are included in the compliance section and are used to detect operator error, equipment malfunctions and deterioration before they result in harm to human health and the environment.

Inspections of all oil equipment and storage areas covered by this SPCC plan shall be performed routinely as a matter of operational practice. Copies of the "Inspection Record" for each source are found in Exhibit 6. All records of the inspections are to be maintained as part of this Plan. The purpose of the inspections is to ensure that the facility is properly maintained in accordance with the facility's SPCC Plan.

Conduct inspections and tests in accordance with written procedures developed by the facility or by the engineer who certifies the facility Plan

Keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years

#### **B. INSPECTION**

Daily safety/housekeeping inspections should be routinely conducted at this facility. These daily safety/housekeeping inspections shall include visual inspection of potential pollution areas.

A stormwater inspection should be conducted after each stormwater event. The inspection should include inspection of each outdoor containment system and drainage structures, prior to discharge of stormwater from the containments. Each discharge should be documented on the Controlled Discharge Report Form or equivalent.

A monthly SPCC inspection shall be conducted and documented by the Emergency Coordinator or his/her responsible designee. At a minimum, the inspection should include visual inspection of all potential pollution sources and areas. Leaks from any source should be corrected immediately to avoid future problems. Other items to be inspected include the presence of sufficient absorbent materials for a spill cleanup.

A "Monthly SPCC Inspection" form or equivalent form shall be completed during the inspection and maintained with the SPCC Plan. Any problems found during the inspections are to be immediately reported for resolution.

#### **C. INSPECTION PROCEDURES**

Inspections are to be conducted by properly trained personnel. The inspection form lists all items to be inspected, the frequency of inspection, and the types of problems to look for during the inspection. All observations, including the time of inspection, are recorded on the appropriate checklist. At a minimum, the inspection checklists used by the inspector shall include all of the equipment. The checklist is signed and dated by the individual performing the actual inspection. Any deficiencies detected during the inspection are noted on the inspection form (unless the deficiency is corrected immediately in the presence of the inspector) and reported to the Director of Environmental Health and Safety.

It is the responsibility of the Director of Environmental Health and Safety or his /her responsible designee to initiate a response to each identified deficiency. Abatement and remedial actions are taken immediately whenever threats to human health or environment are present. Other concerns are to be addressed promptly.

#### **D. INTEGRITY TESTING**

SPCC regulations require regularly scheduled integrity testing of each above ground container, regardless of size. The frequency and type of testing must consider the container size and design (such as floating roof, skid-mounted, elevated, or partially buried). Visual inspection must he combined with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, or another system of non-destructive testing.

Each of the Permanent aboveground bulk storage tanks shall undergo periodic integrity testing listed above. This testing shall be performed not less than once every three years. Records of this tank testing shall be kept with the SPCC Plan. The Director of Mechanical and Electrical Maintenance is responsible for insuring this testing is conducted.

The SPCC may deviate from the tank testing requirements, if equivalent environmental protection is provided by some other means of spill prevention control or Countermeasure. Because drums and totes are only used on a temporary basis, visual inspection alone will be sufficient for these containers.

#### E. RECORD KEEPING AND DOCUMENTATION OR CORRECTIVE ACTIONS

Records of each inspection shall be maintained at the facility for a period of not less than three years. The inspection record must indicate:

- 1. Date of inspection;
- 2. Time of inspection;
- 3. Name of inspector,
- 4. Observations made,
- 5. Nature of repairs/remedies; and
- 6. Date of repairs/remedies.

#### F. PERSONNEL TRAINING

A copy of the "Personnel Response Training Log" is included as Exhibit 8. Records of personnel training shall be maintained at the facility for a minimum of three years.

Train oil-handling personnel

- Operation/maintenance of prevention equipment
- Discharge procedure protocols
- Applicable pollution control laws, rules, and regulations
- General facility operations
- Contents of the facility SPCC Plan
- Designate person accountable for discharge prevention and who reports to facility management
- Schedule/conduct <u>at least one</u> briefing/year:
  - Known discharges and failures, malfunctioning components, new precautionary measures

## **SECTION VIII**

## **EXHIBITS**

## CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

#### EXHIBIT NO. 1 CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

#### UNIVERSITY OF ALABAMA IN HUNTSVILLE HUNTSVILLE, ALABAMA SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than of equal to 42,000 gallons?

Yes \_\_\_\_\_ No \_\_\_X\_\_\_\_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground oil storage tank area?

Yes \_\_\_\_\_ No \_\_\_X\_\_\_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-II to Appendix C of 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and II to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E of Part 112, Section 13 for availability) and the applicable Area Contingency Plan.

Yes \_\_\_\_\_ No \_\_\_X\_\_\_

4. Does the facility have a total oil storage capacity greater than 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C of 40CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes \_\_\_\_\_ No \_\_\_\_X\_\_\_\_

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes \_\_\_\_\_ No \_\_\_X\_\_\_

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe (hat the submitted information is true, accurate, and complete.

Mark Cowherd Assistant Vice President of Facilities and Operations

Date

## CONTROLLED DISCHARGE REPORT FROM

#### EXHIBIT NO. 2 CONTROLLED DISCHARGE REPORT FROM

#### UNIVERSITY OF ALABAMA IN HUNTSVILLE HUNTSVILLE, ALABAMA CONTROLLED DISCHARGE REPORT FORM

Note: This form to be completed each time a secondary containment structure is inspected and found to contain accumulated precipitation and/or oil. If this accumulated water is to be released, this form must be completed and retained.

| TANK /CONTAINMENT:  |
|---|
| DATE OF INSPECTION  |
| INSPECTOR:  |
| CONDITION OF CONTAINMENT AREA:                                      |
| ACCUMULATED WATER PRESENT: YES NO (Circle One)                      |
| EVIDENCE OF OIL RELEASE IN DRAINAGE SYSTEM: YES NO (Circle One)     |
| IF YES. CORRECTIVE ACTION MUST BE TAKEN BEFORE RELEASE              |
| CORRECTIVE ACTIONS TAKEN:   |
| ESTIMATED VOLUME RELEASED:  |
| APPEARANCE OF WATER RELEASED:                                       |
| DRAIN VALVE CLOSED FOLLOWING RELEASE: YES NO (Circle One)           |
| DRAIN VALVE MUST BE RETURNED TO THE CLOSED POSITION                 |
| IF USED, WAS SORBENT REMOVED AND CONTAINERIZED: YES NO (Circle One) |
|   |
|   |

SIGNATURE:.\_\_\_\_\_

DATE:\_\_\_\_\_

#### FACILITY LOCATION MAP



## SITE PLAN, FACILITY DRAINAGE, AND POTENTIAL POLLUTION SOURCES

## **COMPLIANCE CHECKLIST**

#### EXHIBIT NO. 5 COMPLIANCE CHECKLIST

#### UNIVERSITY OF ALABAMA IN HUNTSVILLE HUNTSVILLE, ALABAMA SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

- If a spill occurs, follow all procedures and clean up immediately.
- Conduct oil handling employee training yearly or sooner as needed for new oil handling employees and record in Personnel Training Log.
- Conduct daily safety/housekeeping inspections and Monthly SPCC inspections as indicated by the Plan and record on the Inspection Checklist that follows
- Conduct source inspection as necessary but not less than once a month and note in the Source Inspection Records that follow.
- Review and evaluate the SPCC Plan annually.
- Professional Engineer Certification of the SPCC Plan every five years.
- Amend and recertify (PE) the SPCC Plan within six months whenever there is a change in the facility design, construction, operation, or maintenance that materially increases its potential for an oil discharge.
- Report to the EPA Regional Administrator any single spill greater than 1,000 gallons or any two spills greater than 42 gallons each within any consecutive 12 month period into a natural water way.

## MONTHLY SPCC INSPECTION CHECKLIST

Inspection Date:-----am/pm

| UST Area Inspection for SPCC                                      |         |                          |  |  |  |
|---|---------|--------------------------|--|--|--|
| Source 1- 5000 gal. diesel fuel Engineering Bldg emergency genera | tor tan | k                        |  |  |  |
| 2500 gal. diesel fuel Library C (old) emergency generator tank    |         |                          |  |  |  |
| 2000 gal. unleaded gasoline physical plant tank                   |         |                          |  |  |  |
| 1000 gal. diesel fuel physical plant tank                         |         |                          |  |  |  |
| 10000 gal. diesel fuel Roberts Hall emergency generator tank      |         |                          |  |  |  |
| 5000 gal. diesel fuel University Center emergency generator tank  |         |                          |  |  |  |
| 8000 gal. diesel fuel VonBraun Research Hall emergency generator  | tank    |                          |  |  |  |
| 7500 gal. diesel fuel WH-Old Wing emergency generator tank        |         |                          |  |  |  |
| Yes No Inspection Section Comme                                   | ents    | <b>Corrective Action</b> |  |  |  |
| Any visible spills, residue, or leakage in                        |         |                          |  |  |  |
| the area?   |         |                          |  |  |  |
| Is there any leakage around fittings?                             |         |                          |  |  |  |
| Are product piping valves locked and                              |         |                          |  |  |  |
| keys maintained by appropriate                                    |         |                          |  |  |  |
| personnel?  |         |                          |  |  |  |
| Is there enough absorbent materials                               |         |                          |  |  |  |
| available to contain possible spills?                             |         |                          |  |  |  |
|   |         |                          |  |  |  |
| OTHER OBSERVATIONS:   |         |                          |  |  |  |
|   |         |                          |  |  |  |
|   |         |                          |  |  |  |
|   |         |                          |  |  |  |
|   |         |                          |  |  |  |
|   |         |                          |  |  |  |
| Inspected by:   |         |                          |  |  |  |
| Printed Name  |         |                          |  |  |  |
|   |         |                          |  |  |  |
|   |         |                          |  |  |  |
| Signature:  |         |                          |  |  |  |

All problems and questionable conditions shall be noted on the inspection form and immediately reported to the Environmental Manager. All necessary corrective action shall be undertaken in a timely manner and shall be recorded. All inspection record shall be maintained for a minimum of three years.

#### **AST Area Inspection for SPCC**

Source 2- 800 gal. diesel fuel Central Plant 800 gal. diesel fuel Cramer Hall (annex) 600 gal. diesel fuel Crammer Hall (weather) 300 gal. diesel fuel Cramer Hall (computer) 180 gal. diesel fuel Technology Hall 500 gal. diesel fuel VonBraun Research Hall

| Yes                 | No | Inspection Section   | Comments | <b>Corrective Action</b> |  |  |
|---------------------|----|--|----------|--------------------------|--|--|
|                     |    | Any visible oil residue or leakage from  |          |                          |  |  |
|                     |    | the storage tanks?   |          |                          |  |  |
|                     |    | All transfer pipes properly labeled?   |          |                          |  |  |
|                     |    | Any visible spills, residue, or leakage in containment areas?                        |          |                          |  |  |
|                     |    | Is there any leakage around fittings?  |          |                          |  |  |
|                     |    | Are product piping valves locked and<br>keys maintained by appropriate<br>personnel? |          |                          |  |  |
|                     |    | Is there any leakage around piping?  |          |                          |  |  |
|                     |    | Is there enough absorbent materials available to contain possible spills?            |          |                          |  |  |
| OTHER OBSERVATIONS: |    |  |          |                          |  |  |
|                     |    |  |          |                          |  |  |
| Inspected by:       |    |  |          |                          |  |  |
| Signat              |    | Printed Name   |          |                          |  |  |
| Signature:          |    |  |          |                          |  |  |

All problems and questionable conditions shall be noted on the inspection form and immediately reported to the Environmental Manager. All necessary corrective action shall be undertaken in a timely manner and shall be recorded. All inspection record shall be maintained for a minimum of three years.

#### **Transformer Area Inspection for SPCC**

Source 3- 200 gal. Administrative Bid. Transformer, 416 gal. Bevel Center transformer, 141 gal. Business Center transformer, 172gal- Central Campus Residence Hall T-I, transformer 172 gal. Central Campus Residence Hall T-11 transformer, 140 gal. Central Recieving transformer, 416 gal. Cramer Hall (side) transformer, 425 gal. Cramer Hall (front) transformer Est., 200 gal. Credit Union transformer, 200 gal. Engineering Bid. Transformer, 538 gal. Fitness Center transformer, 300 gal. Johnson Research Center, transformer 164 gal. Library Phase I transformer, 538 gal. Library Phase n transformer, 347 gal. Madison Hall transformer, 357 gal. Morton-Hall-n transformer, 223 gal. North Campus Residence Hall I transformer, 173 gal. North Campus Residence Hall H transformer, 300 gal. Nursing Building transformer, Est. 100 gal. Physical Plant transformer, Est. 500 gal. Roberts Hall transformer, Est. 250 gal. Shelbie King Hall transformer 74 gal. Southeast Housing Bid. 600 transformer, 89 gal. Southeast Housing Bid. 604 transformer 89 gal. Southeast Housing Bid. 608 transformer, Est. 89 gal. Southeast Housing Bid. 700 tranf. Est. 89 gal. Southeast Housing Bid. 704 transformer, 538 gal. Spragins Hall (back) transformer 1408 gal. Spragins Hall (tennis court) transformer, 480 gal. Technology Hall (east) transformer 140 gal. Technology Hall (west) transformer, 366 gal. University Center transformer, Est. 250 gal. VonBraun Research Institute transformer, 205 gal. Wilson Hall transformer, Shelby Center for Science and Technology (Capacity NA), Intermodal Facility (Capacity NA), Charger Village (Capacity NA)

| Yes           | No    | Inspection Section                        | Comments | <b>Corrective Action</b> |  |  |  |
|---------------|-------|---|----------|--------------------------|--|--|--|
|               |       | Any visible oil residue or leakage from   |          |                          |  |  |  |
|               |       | the transformer?                          |          |                          |  |  |  |
|               |       | Any visible evidence of physical damage   |          |                          |  |  |  |
|               |       | to the transformer?                       |          |                          |  |  |  |
|               |       | Any visible oil residue or leakage on the |          |                          |  |  |  |
|               |       | ground surrounding the transformer?       |          |                          |  |  |  |
|               |       | Is there enough absorbent materials       |          |                          |  |  |  |
|               |       | available to contain possible spills?     |          |                          |  |  |  |
| OTHE          | R OBS | ERVATIONS:                                |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
| Inspected by: |       |   |          |                          |  |  |  |
| Printed Name  |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
| Signature:    |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |
|               |       |   |          |                          |  |  |  |

All problems and questionable conditions shall be noted on the inspection form and immediately reported to the Environmental Manager. All necessary corrective action shall be undertaken in a timely manner and shall be recorded. All inspection record shall be maintained for a minimum of three years

#### **Elevator Hydraulic Unit Inspection for SPCC**

**Source 4-** 115 gal. Administrative Science elevator 1, 115 gal. Administrative Science elevator 2, 73 gal. Bevel Center elevator 1, 73 gal. Bevel Center elevator 2, 112 gal. Engineering Bid. Elevator, 116 gal. Environmental Bid. Elevator, 120 gal. Library Phase I elevator 1, 147 gal. Library Phase n elevator 2, 91 gal. Library Phase HI elevator 3, 155 gal. Madison Hall elevator, 197 gal. Material Science elevator, 82 gal. NSSTC elevator 1, 82 gal. NSSTC elevator 2, 89 gal. Nursing Bid. Elevator, 173 gal. Optics Bid. Elevator 1, 173 gal. Optics Bid. Elevator 2, 228 gal. Optics Bid. Elevator 3, 109 gal. Research Hall elevator, 163 gal. Residence Hall elevator 1, 163 gal. Residence Hall elevator 2, 163 gal. Residence Hall elevator 3, 159 gal. Technology Hall elevator, 115 gal. University Center elevator 1, 119 gal. University Center elevator 2, 102 gal. University Fitness Center elevator, 108 gal. Wilson Hall elevator

| Yes           | No     | Inspection Section                        | Comments | <b>Corrective Action</b> |  |
|---------------|--------|---|----------|--------------------------|--|
|               |        | Any visible oil residue or leakage from   |          |                          |  |
|               |        | the unit?                                 |          |                          |  |
|               |        | Any visible evidence of physical damage   |          |                          |  |
|               |        | to the unit?                              |          |                          |  |
|               |        | Any visible oil residue or leakage on the |          |                          |  |
|               |        | floor surrounding the unit?               |          |                          |  |
| OTHE          | ER OBS | ERVATIONS:                                |          |                          |  |
|               |        |   |          |                          |  |
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|               |        |   |          |                          |  |
| Inspected by: |        |   |          |                          |  |
| Printed Name  |        |   |          |                          |  |
|               |        |   |          |                          |  |
|               |        |   |          |                          |  |
| Signature:    |        |   |          |                          |  |
|               |        |   |          |                          |  |
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All problems and questionable conditions shall be noted on the inspection form and immediately reported to the Environmental Manager. All necessary corrective action shall be undertaken in a timely manner and shall be recorded. All inspection record shall be maintained for a minimum of three years

#### EXHIBIT NO. 7 TANK TESTING AND REPAIR LOG

#### EXHIBIT NO. 7 TANK TESTING AND REPAIR LOG

#### **RECORD OF TANK TESTING AND REPAIRS**

| Tank<br>Identification | Test | Method<br>of Tosting | Problems<br>Noted | Description of    | Date      | Initials |
|------------------------|------|----------------------|-------------------|-------------------|-----------|----------|
|                        | Date | or resulig           | Noteu             | repairs remonined | periormeu |          |
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|                        |      |                      |                   |                   |           |          |

#### EXHIBIT NO. 8 PERSONNEL TRAINING LOG

#### EXHIBIT NO. 8 PERSONNEL TRAINING LOG

| Name | <b>Response Training/Topics</b> | Date and Number of<br>Hours |
|------|---------------------------------|-----------------------------|
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#### EXHIBIT NO. 9 40 CFR PART 112 - OIL POLLUTION PREVENTION