OIL SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

St. Lawrence University

Canton, New York

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Inspections and tests performed in accordance with written procedures. Written procedures and records of inspections and tests signed and kept with Plan for at least three years.	Chapter 4
Personnel Training and Discharge Prevention Procedures	40 C.F.R. § 112.7(f)
(1) Oil-handling personnel trained in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general Facility operations; and the contents of the Facility SPCC Plan.	Section 4.11
(2) Designated person responsible for spill prevention.	Section 1.2 and 4.5.2
(3) Schedule and conduct discharge prevention briefings for oil-handling personnel at least once each year.	Section 4.11.2
Security	40 C.F.R. § 112.7 (g)
(1) Each handling, processing or oil storage Facility fully fenced entrance gates are locked and/or guarded when the Facility is unattended.	Section 4.13
(2) Flow and drain valves that directly discharge out are locked in closed position when not operational.	Section 4.13
(3) Oil pump starter controls locked in “off” position or only accessible to authorized personnel when not in use.	Section 4.13
(4) Pipeline loading/unloading connections capped when not in service.	Section 4.13
(5) Adequate facility lighting to discover spills and prevent vandalism.	Section 4.13
Facility Tank Car and Tank Truck Loading/Unloading Rack	40 C.F.R. § 112.7(h)
(1) Quick drainage systems used in areas without catch basins or treatment facility designed to handle discharges; containment designed to hold at least the maximum capacity of a single compartment of a tank car or tank truck loaded or unloaded at the Facility.	N/A
(2) Warning lights, physical barriers, or other measures used provided to prevent truck departure prior to line disconnection.	Section 4.3
(3) Inspection of drains and outlets prior to filling and departure of tank cars and trucks.	Section 4.3

APPLICABLE REGULATORY REQUIREMENTS	*PLAN SECTION*
Brittle Fracture Evaluation	40 C.F.R. § 112.7(i)
Field-constructed aboveground containers that have undergone repair, alteration, reconstruction, a change in service, or have discharged oil have been evaluated for risk of discharge or failure due to brittle fracture.	N/A
Conformance with Applicable State Regulations	40 C.F.R. § 112.7(j)
Discussion of conformance with applicable requirements of any applicable more stringent State rules, regulations or guidelines.	Section 1.3, Chapter 4, Chapter 5
Facility Drainage	40 C.F.R. § 112.8(b)
(1) Restrain diked drainage areas by valves.	N/A
(2) Use of manual open-and-closed drain valves to drain diked areas.	N/A
(3) Drainage of undiked areas into ponds, lagoons and catch basins to retain oil spills.	N/A
(4) Design of in-plant ditches with diversion systems to return spilled oil to Facility.	N/A
(5) Engineer Facility drainage systems to prevent discharges in case of equipment failure or human error	Section 4.2
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(1) Container materials and construction compatible with products stored and conditions or storage	Section 4.2
(2) Adequate and impervious secondary containment for tanks.	Sections 4.2 and 3.0
(3) Requirements for drainage of diked rainwater bypassing treatment system (valve normally closed, valve opened only during drainage, inspect rainwater, records kept).	N/A
(4) Cathodic protection and regular leak testing for new buried metallic tanks.	N/A
(5) Partially buried metallic tanks	N/A
(6) Integrity test aboveground containers on a regular schedule and when material repairs are done.	Sections 4.5.3 and 4.9
(7) Internal heating coils monitored or treated to prevent leakage	Section 3.1
(8) Containers are engineered or updated in accordance with good engineering practices to avoid discharges: High level alarms, high level pump cutoffs, direct signal communication between the container gauger and the pumping station; fast response system for determining the liquid level of each container; regular testing of devices.	Section 4.2
(9) Plant effluent disposal facilities monitored regularly to detect system upsets.	N/A

APPLICABLE REGULATORY REQUIREMENTS	*PLAN SECTION*
(10) Prompt correction of visible leaks; prompt removal of oil accumulated in diked areas.	Section 4.2, Chapter 6
(11) Portable tanks are positioned or located to prevent a discharge and have been provided with adequate secondary containment.	N/A
Transfer Operations	40 C.F.R. § 112.8(d)
(1) Cathodic protective coating for buried piping, exposed pipes inspected for corrosion.	N/A
(2) Terminal connections on out of service piping capped and marked as to origin.	N/A
(3) Pipe supports properly designed.	Section 3.7
(4) Aboveground valves and piping inspected regularly, integrity and leak testing conducted for buried piping.	Section 4.5
(5) Aboveground piping protected by notifying vehicular traffic entering facility.	N/A
OIL SPILL CONTINGENCY PLAN	40 C.F.R. Part 109
Definition of authorities, responsibilities and duties of all those involved with oil removal operations. § 109.5 (a)	Chapter 6
Notification Procedures	40 C.F.R. § 109.5 (b)
(1) Identification of critical water use areas.	Section 2.2
(2) Names, telephone numbers and addresses of those responsible for handling oil discharge as well as agencies that must be notified.	Chapter 6, Table 5-1
(3) Access to a reliable communications system for timely notification and coordination with other oil removal plans.	Section 6.8
(4) Pre-arranged procedure for requesting assistance during major disaster.	Section 6.7
Provisions to Establish and Commit Necessary Resources	40 C.F.R. § 109.5 (c)
(1) Identify and inventory available equipment, resources and supplies.	Section 6.1
(2) Estimate of equipment, resources and supplies needed to remove maximum anticipated oil discharge.	Section 6.1
(3) Arrangements in advance to acquire necessary materials to respond to a discharge.	Section 6.7
Actions to be Taken After Discovery and Notification of Oil Discharge	40 C.F.R. § 109.5 (d)
(1) Designated oil discharge response operating team.	Section 6.7
(2) Predesignation of a qualified oil discharge response coordinator.	Section 6.7
(3) Response operations center and communications system.	Section 6.8
(4) Varying response efforts depending on oil discharge severity.	Chapter 6
(5) Order of priority for protecting water uses.	Section 6.10

APPLICABLE REGULATORY REQUIREMENTS	*PLAN SECTION*
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Substantial Harm Criteria	40 C.F.R. Part 112 Appendix C
Substantial harm criteria certification to exempt facility from preparing a Facility Response Plan	Section 1.3 and Appendix D

RECORD OF CHANGES

DATE	DESCRIPTION OF CHANGE(S)	Approved by.
10/08	• Removal of grease drums and replacement with bins. • Removal of Inventory of Transformers table and modification of text to reflect no transformers used on site exceed 55 gallons. • Clarification of Compliance Inspection language and requirements • Clarification of Elevator Rooms with floor drains (Section 3.4) • Addition of tank tightness result to text and as Appendix. • Addition of Oil Spill Equipment Locations (Section 6.1) • Revisions to Site Plan and Hydraulic Elevator map	
12/09	• Addition of Addendum to SPCC for Construction Projects, Appendix H • Addition of temporary AST used by maintenance staff for fuel transport, located in grounds equipment shed	

1. GENERAL INFORMATION

1.1 FACILITY INFORMATION

Facility Name ..... St. Lawrence University

Facility Owner ..... St. Lawrence University

Facility Operator ..... St. Lawrence University

Facility Street Address ..... 23 Romoda Drive, Canton, New York 13617

Facility Phone Number ..... (315) 229-5011

Watershed ..... Grass River to the St. Lawrence River
Nearest Surface Water Body ..... Little River
Longitude ..... 75˚ 9' 41" W
Latitude ..... 44˚ 35' 30" N

1.2 FACILITY CONTACTS

Primary Facility Contact ..... Dan Seaman
Director of Facilities Operations
(315) 229-5632
(315) 244-8345 (cell)

Oil SPCC On-site Coordinator ..... Suna Stone-McMasters
Chemical Hygiene/Environmental Compliance Officer
(315) 229-5105
(315) 386-2380 (home)

Oil SPCC Alternate On-site Coordinators…….. Ted Coviello
Director, Contracts, Compliance & Risk Management
(315) 229-5913
(315) 323-1766 (cell)
(315) 386-1400 (home)

Oil SPCC Alternate On-site Coordinators ..... Rick Scott
Facilities Manager
(315) 229-5611
(315) 323-3640 (cell)
(315) 769-7486 (home)

Oil SPCC Alternate On-site Coordinators ..... Jim Kozsan
Trades Manager
(315) 229-5625
(315) 323-0384 (cell)
(315) 769-2267 (home)

Oil SPCC Alternate On-site Coordinators ..... Marcus Sherburne
Grounds Manager
(315) 229-5610
(315) 323-2419 (cell)
(315) 714-2336 (home)

1.3 PURPOSE OF THE PLAN

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by the Saint Lawrence University (SLU) to prevent oil discharges from occurring, and to prepare SLU to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

SLU is a non-transportation-related facility that could reasonably be expected to discharge oil into navigable water of the United States. The facility has an aboveground aggregate oil storage capacity that exceeds the United States Environmental Protection Agency's (USEPA's) 1,320-gallon regulatory threshold. The facility is therefore subject to 40 CFR Part 112. Oil storage covered under 40 CFR Part 112 includes, but is not limited to:

- Aboveground storage tanks (AST) 55 gallons or greater that are used for oil storage (e.g. No. 2 fuel oil, diesel, gasoline, kerosene, food oils and etc.);
- Tanks on or above the floor of underground areas (e.g., basements or tunnels);
- Underground storage tanks (UST) of any size that contain fuel oil (e.g. No. 2, 4, or 6 fuel oil);
- USTs containing oil with a capacity of 110 gallons or less;
- USTs storing non-petroleum oils, such as animal fat or vegetable oil;
- Farm USTs of 1,100 gallons or less capacity used for storing motor fuel (e.g. gasoline or diesel) for noncommercial purposes;
- Portable oil containers 55 gallons and greater, such as drums and skid tanks; and
- Oil-filled operational equipment, such as electrical transformers, that contain greater than 55 gallons of oil.

Oil storage that is exempt from 40 CFR Part 112 includes but is not limited to:

- Any aboveground storage tank/container with a capacity of less than 55 gallons of oil, such as quarts of motor oil;
- Buried oil tanks subject to 40 CFR Part 280 (e.g. diesel and gasoline USTs with storage capacities greater than or equal to 110 gallons);
- Septic tanks and systems for collecting storm water and wastewater;
- Flow-through process tanks;
- Emergency spill and overfill tanks that are expeditiously emptied after use (e.g. USTs that are used for transfer area secondary containment);
- Any UST system holding RCRA hazardous waste; and
- Onboard oil containers used to power the movement of a vehicle.

SPCC Compliance Date

SPCC regulations were first released in 1974. The requirements of the original rule included: sufficient secondary containment for tanks, loading/unloading areas, operating equipment and etc.; the exemption of tanks subject to the requirements of 40 CFR Part 280; and required certain components in each SPCC plan.

The 2002 Amendment, which required compliance for existing facilities by August 18, 2006, contained several signification changes and clarifications. Some of the significant changes and clarifications include:

- Definition of an oil as: oil of any kind or in any form, including (but not limited to): fats, oils, or greases of animal, fish or marine mammal origin; vegetable oils, oil refuse, or oil mixed with waste other than dredged soil.";
- Applicability of the rule to facilities that maintain greater than 42,000 gallons underground storage or 1,320 aboveground oil storage capacities;
- Requirement for a P.E. certification of the plan;
- Requirement the development and implementation of a regular schedule of visual inspections, integrity testing, and/or other testing methods in accordance with industry standard; and
- Requirement to provide loading/unloading rack with secondary containment sufficient to hold the maximum capacity of a single compartment of a tuck loaded/unloaded at the facility.

The 2006 Amendment, which required compliance for existing facilities by July 1, 2009, contained several signification changes and clarifications. Some of the significant changes and clarifications include:

- Allowance for self certification alternative, as discussed below;
- Allowance for an alternative to secondary containment for operating equipment, as discussed below;
- Exemption for motive power containers (the onboard bulk storage container used to power the movement of a vehicle, such as automotive or truck fuel tanks) from the rule.

Self Certification Alternative

A facility that stores less than 10,000 gallons in aggregate aboveground oil storage capacity and meets oil discharge history criteria* may self-certify their SPCC Plan. This option is not available to SLU because their aggregate aboveground oil storage capacity is greater than 10,000 gallons; therefore this plan has been reviewed by a Professional Engineer (PE).

Alternative for Oil-filled Operating Equipment

In additional to bulk storage containers (tanks, drums, and etc.) and unloading areas, the SPCC rule regulates oil-filled operational equipment (transformers, gear boxes, electrical switches and hydraulic systems, and etc. that contain 55 gallons or more of oil). Facilities that meet oil discharge requirements* from the operational equipment and maintain oil-filled operational equipment that do not have sufficient secondary containment may choose to implement the alternative requirements in place of secondary containment and do not need to show impracticability (40 CFR 112.7(k)). The alternative requirements include:

- Implement an inspection and monitoring program to detect equipment failure and/or a discharge;
- Develop an oil spill contingency plan pursuant to 40 CFR Part 109; and
- Provide a written commitment of resources to control and remove oil discharged.

An Oil Spill Contingency Plan has been prepared as part of this SPCC since the facility maintains electrical transformers that are not provided with secondary containment.

*To use these alternatives a facility (or its equipment) must meet requirements for its reportable discharge history. The facility must not have had (1) a single discharge of oil to navigable waters exceeding 1,000 U.S. Gallons or (2) two discharges of oil to navigable waters each exceeding 42 U.S. gallons within any twelve-month period, in the three years prior to the SPCC Plan certification date, or since becoming subject to 40 CFR Part 112 if operating for less than three years. Eligibility for the

oil-filled operational equipment alternative is determined by the discharge history from the equipment, not the entire facility.

In accordance with 40 C.F.R. § 112.20, SLU is also required to determine whether it is a high-risk facility that poses a threat of *substantial harm* to the environment, thereby triggering the Facility Response Plan requirements and associated appendices. The SLU campus does not meet the substantial harm criteria, and is therefore not required to prepare and submit a Facility Response Plan to EPA. An Applicability of Substantial Harm Criteria Checklist and Certification is included in Appendix D.

Each chapter of this Oil SPCC Plan identifies the federal and state laws and regulations it satisfies. A Regulatory Requirements Cross Reference Table, preceding Chapter 1, identifies applicable regulatory requirements and the Plan chapter(s) or section(s) that satisfy them. SLU has adopted this Regulatory Requirements Cross Reference Table because this Plan does not follow the exact sequence specified in 40 C.F.R. § 112.7 of the regulations.

SLU's tanks are also subject to the New York State Department of Conservation (DEC) Petroleum Bulk Storage (PBS) Rules found in 6 NYCRR Parts 612-614. These rules apply to the design and management of petroleum-containing tanks and piping. The applicable portions of the PBS requirements are also addressed in this Plan.

Areas Covered by this Oil SPCC Plan. This Oil SPCC Plan covers all oil storage tanks, containers and oil-containing equipment located on the SLU main campus and the SLU Golf Course as identified in the Tables in Chapter 3, and depicted on Figure 2-2.

Conformance

SLU's campus conforms with the applicable requirements and other effective discharge prevention and containment procedures listed in 40 CFR Part 112 or any applicable more stringent State rules, regulations, and guidelines, except for the following:

- SLU is not equipped with fencing surround the entire campus. However, alternative measures will be employed that will provide adequate environmental protection. Prevention of unknown entry and access to the SLU's oil storage areas is accomplished by several methods as noted in Section 4.13;
- Drums in Facilities must be labeled used oil not waste oil;
- All AST fill pots must be equipped with fill code (white circle with black cross for low unleaded gasoline, yellow hexagon for diesel fuel, #6 fuel oil for #6 fuel oil);
- All NYSDEC regulated PBS tanks must be labeled with Tank ID, Design capacity, and Working capacity; and
- The underground piping associated with the Grass River Pump House's generator AST is not equipped with leak detection and periodic integrity testing has not been completed.

1.4 AMENDMENTS TO PLAN

This is intended to be an integral part of the operations at SLU. To increase its effectiveness, the Oil SPCC Plan will be amended by SLU whenever:

1. It fails in an emergency;

2. The facilities on campus change significantly in design, construction, operation, or maintenance in a manner likely to impact the effectiveness of this plan;
3. Some other circumstance significantly increases the potential for releases of oil products or other changes in the response necessary in any emergency;
4. An exercise or emergency response drill indicates an amendment is necessary;
5. Either the On-site Coordinator, the Alternate On-site Coordinator, or the response equipment list change;
6. The Regional Administrator of the Environmental Protection Agency deems a change to be necessary; or
7. There is a change in applicable statutes or regulations.

1.5 COMPLIANCE INSPECTION AND PLAN REVIEW

In accordance with 40 CFR 112.5(a), SLU periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- Commissioning and decommissioning of containers, including the addition or relocation of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- Change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- Change in the name or contact information of spill response or cleanup contractors.

SLU must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Director of Facilities Operations is responsible for initiating and coordinating revisions to the SPCC Plan.

In addition, a complete review and evaluation of the Oil SPCC Plan will be conducted at least once every five years. The review and evaluation will be documented and SLU will sign a statement in the review log as to whether the Plan will or will not be amended. If warranted based on the review and evaluation, SLU will amend the Oil SPCC Plan within six months of the review to include more effective prevention and control technology if such technology: (1) significantly reduces the likelihood of a spill event from the facility; and (2) has been field-proven at the time of review. SLU will implement such amendments within six months of the preparation of any amendments to the Oil SPCC Plan. The review log for this Oil SPCC Plan is included in Figure 1-1.

1.6 CAMPUS ADMINISTRATION APPROVAL AND COMMITMENT OF RESOURCES

SLU is committed to conducting its operations in a safe and environmentally responsible manner. All employees are expected to promote and foster a safe work environment. Precautionary measures, including the adoption of this Oil SPCC/Oil Spill Contingency Plan, have been taken to minimize the potential for incidents that could result in oil emergencies.

SLU administration and management fully support the adoption and implementation of this Plan. This commitment includes providing the manpower, equipment, and materials required to expeditiously control and remove any harmful quantity of oil that may be discharged. SLU agrees to comply with reasonably determined enforcement measures as provided for by State and local statutes and ordinances.

The Primary Facility Contact and Oil SPCC Coordinators are thoroughly familiar with SLU's operations, oil storage locations, and this Plan. SLU is prepared to implement this Plan during an emergency and is committed to ensuring oil spill preventive measures are addressed during non-emergency times.

Primary Facility Contact:

Dan Seaman
St. Lawrence University
Director of Facilities Operations

1.7 MAINTENANCE AND AVAILABILITY OF PLAN

A complete copy of this Oil SPCC Plan is maintained in SLU's Office of Campus Support Services by Ted Coviello, and shall be made available to the Regional Administrator of EPA, or his or her designee, for on-site review during normal working hours if requested. This Plan is not required to be submitted to EPA or to the New York DEC for review and approval.

1.8 ENGINEER'S CERTIFICATION

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [40 CFR 112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112. This Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment,

containment, and other devices as prescribed in this Plan.I hereby certify that I am familiar with the requirements of 40 C.F.R. Part 112 and this Oil SPCC Plan.

Jeffrey R. Sotek
Name of Registered P.E.

Signature of Registered P.E.

Date

Registration No. 074661-1

State: New York

1.9 FACILITIES, PROCEDURES, METHODS, OR EQUIPMENT NOT YET FULLY OPERATIONAL

There are no facilities, procedures, methods, or equipment that are not yet full operational, therefore this section does not apply.

Figure 1-1: Oil SPCC Review Log

Review #1

"I have completed a review and evaluation of SLU's Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #2

"I have completed a review and evaluation of SLU's Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #3

"I have completed a review and evaluation of SLU's Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #4

"I have completed a review and evaluation of SLU's Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

2. FACILITY DESCRIPTION

2.1 FACILITY LOCATION / OPERATIONS

SLU is a liberal arts university located in Canton, New York. Founded in 1856, SLU is the oldest continuously coeducational institution of higher learning in New York State. SLU enrolls approximately 2,200 undergraduates and 120 graduate students, and offers the following degrees: Bachelor of Arts; Bachelor of Science; Master of Education; and Certificate of Advanced Studies in Educational Administration. There are approximately 178 full-time, and 38 part time faculty at SLU.

The SLU campus consists of approximately 70 buildings spread over 240 acres, and includes: administrative, academic and research buildings; residence halls; theme cottages; dining halls; two libraries; a health center; a bookstore; a new student center; extensive athletic facilities including the Augsbury Physical Education Center, the Leithead Field House, the Newell Field House, the Appleton Ice Arena, the SLU Golf Course, and the Elsa Gunnison Appleton Riding Hall; the Best Western University Inn; a Central Heating Plant; and a Facilities Operations Center.

2.2 DRAINAGE PATHWAY AND DISTANCE TO NAVIGABLE WATERS

Portions of the SLU campus are located on the banks of the Little River and the Grass River. See Figure 2-1. On the southeastern portion of the campus, the ground surface generally slopes to the southeast toward the Little River, which is located approximately 700 feet southeast of the Facilities Operations Center. In the northern and southwestern parts of the campus, the ground surface generally slopes to the west-southwest toward the Grass River, which is located approximately 800 feet southwest of the Appleton Ice Arena. Stormwater runoff from the SLU campus and any potential oil release that may escape secondary containment structures or diversionary systems in place would be intercepted by catch basins and conveyed by way of a separate storm water system that ultimately discharges to the Little River. A stormwater retention basin system was constructed 2006 as part of the New Science Center construction project. Stormwater from the New Science Center building is now diverted into this stormwater retention basin system with regulated overflow discharges into the Little River. SLU's stormwater collection system drawings are provided in Appendix E. Stormwater runoff from portions of the SLU campus and the SLU Golf Course flow into unnamed tributaries of the Little River, or directly into the Little River. The facility site plan, which identifies the location and contents of each oil storage tank and container as required by 40 C.F.R. § 112.7(a)(3), is provided in Figure 2-2.

2.3 IDENTIFICATION OF CRITICAL WATER USE AREAS

The Oil Spill Contingency Plan regulations require that any "critical water use areas" in the vicinity of the campus be identified. While EPA has no formal definition of "critical water use area," the following qualifying categories were provided by EPA Region II Spill Coordinator Christopher Jimenez: 1) a water intake for a power plant or a potable water-providing utility; 2) groundwater wells for public drinking water supply; or 3) sole source aquifers.

As described above, SLU's stormwater retention basin system is located on campus, and the Little and Grass Rivers lie beyond SLU's borders. None of these water bodies would be considered a critical water use area, and the likelihood of an oil release reaching any of them, is extremely low. SLU is supplied with drinking water from the Village of Canton municipal public water supply which is not in the vicinity of the SLU campus. The Oil Spill Contingency Plan is required because the two USTs are unprotected. Therefore, the USTs are the focus of the 40 C.F.R. Part 109 rules as they apply to SLU's oil storage

operations. The probability of a UST oil release reaching a surface water body is much less than a release from an aboveground container. SLU personnel have no specific knowledge of groundwater at the site connecting to any surface water bodies. See 40 C.F.R. § 109.5(b)(1).

Figure 2-1: Site Location Map

Figure 2-2: Oil Storage Locations

Figure 2-3: Hydraulic Elevator Locations

3. OIL STORAGE FACILITIES AND CONTAINMENT

This Section of the Oil SPCC Plan identifies and describes the bulk (i.e., greater than 55 gallons) oil storage tanks and containers, their design, related secondary containment structures, piping, transfer locations, and interior and exterior drainage. This Section of the Plan also identifies the most likely causes of spills, predicted spill pathways and probable direction, estimated maximum spill quantities, rates of flow, and satisfies many of the requirements of 40 C.F.R. § 112.7(b) and (c) and § 112.8.

A variety of petroleum and oil products are stored in several aboveground storage tanks (ASTs), equipment, machinery, and small containers throughout the SLU campus and SLU Golf Course. SLU also currently maintains two underground storage tanks (USTs) at the Central Heating Plant. See Figures 2-2 and 2-3.

Tables 3-1 through 3-4 provide a description of bulk oil storage container locations, capacities, and means of secondary containment.

The likelihood of an oil release discharging into or upon navigable waters of the United States, and waters of New York is low because SLU:

1. provides all bulk oil storage containers with appropriate containment structures and/or diversionary structures or equipment to prevent a discharge;
2. complies with state and federal regulations for the handling and storage of petroleum;
3. performs regular preventive maintenance and inspection of all oil storage facilities; and,
4. employs Best Management Practices to avoid minor spills during routine operations.

A description of all bulk oil storage facilities, including secondary containment, tank construction, installation dates, overspill protection and alarms is provided in this section.

3.1 UNDERGROUND OIL STORAGE TANKS

SLU maintains two (2) 20,000-gallon single–wall steel underground storage tanks (USTs) for the storage of No. 6 fuel oil at the Central Heating Plant (Oil SPCC Plan tank #1 and #2, New York Department of Environmental Conservation (DEC) registration certificate tank #012A and #012B). See Table 3-1 and Figure 2-2. The No. 6 fuel oil is used as a backup fuel source for the heating plant in the event of a disruption in the natural gas service to SLU. The exact installation dates of the two USTs is unknown, but is believed to be 1960. Both USTs pre-date December 27, 1985, and therefore, are considered "existing" UST facilities per 6 NYCRR § 612.1(c)(9). The USTs also pre-date January 10, 1974, and therefore, are not required to be protected against corrosion per 40 C.F.R. § 112.8(c)(4). Based on conversations with personnel at the Central Heating Plant, the USTs at SLU were installed in the 1960 when the boilers were initially installed. The USTs at SLU were tightness tested for tightness in May 2008 using the EZY 3 Locator Method. Both USTs passed the test. Copies of the tightness test are included as Appendix G.

The USTs have not been substantially modified or reconditioned, and therefore, are not subject to 6 NYCRR Part 614, *Standards for New and Substantially Modified Petroleum Storage Facilities* regulations. Because the tanks are used to store "heating oil for consumptive use on the premises where stored," they are not subject to federal Resource Conservation Recovery Act (RCRA) regulations for

USTs under 40 C.F.R. Part 280. See 40 C.F.R. § 280.12. The USTs are, however, subject to the Oil SPCC requirements in 40 C.F.R. §§ 112.7 and 112.8.[1]

The fill ports to the USTs are locked when not in use and are located in an area on campus that is not subject to regular vehicular traffic. The tanks are equipped with internal steam-heating coils to pre heat the No. 6 fuel oil. The pressure of the heating system is monitored and controlled. The heating coils act as a closed loop system and condensation is returned to the flow of make-up water for the boiler. Any oil contamination in the condensation would be immediately identified by the heating plant personnel via daily visual inspections. The heating coil system is contained within a vaulted area constructed of concrete.

Both USTs are equipped with meters that measure product that is removed from the tanks. Leak monitoring of the tanks is conducted through daily and monthly written inspections, meter inventories, and periodic integrity and leak test testing of the tanks, valves and piping. See Section 4.9 for a full discussion of the specific leak monitoring, inspections, and periodic testing conducted by SLU on the two USTs.[2] Spill response equipment is located in the USTs' general area.

3.1.1 Impracticability of Secondary Containment

The installation of new UST secondary containment systems for the two 20,000 gallon USTs at SLU as specified under 6 NYCRR § 614.4 and 40 C.F.R. § 112.8(c)(2) for new tank systems (the installation of either double walled tanks, a vault, cut-off walls, or an impervious underlayment) is not immediately feasible or practicable because it would require the excavation and closure of both tanks that are located adjacent to and below the Central Heating Plant. There are space and geographic limitations at the facility that makes the installation of either double walled tanks, a vault, cut-off walls, or an impervious underlayment beneath the existing USTs impracticable. This Plan institutes a schedule for periodic integrity testing and leak testing to ensure that the USTs remain intact. The periodic tightness testing protocol, beginning within one year of certification of the Plan, will ensure that if any part of the two UST systems are not tight, those components of the systems, including the tanks, will be promptly replaced or repaired. Unless there is an evidence of a leak, the closure of these existing USTs, which are used to store No 6 fuel oil for consumptive use on the premises, is not required under federal or state UST regulations (40 C.F.R. Part 280, and 6 NYCRR Parts 612 through 614).

Under 40 C.F.R. § 112.7(d), where the installation of secondary containment is not practicable, the owner/operator is allowed to deviate from the secondary containment requirement, provided that:

1. an oil spill contingency plan following the provisions of 40 C.F.R. Part 109 is provided in the Oil SPPC Plan;

[1]Completely buried storage tanks that are subject to all of the technical requirements of 40 C.F.R. Part 280, are partially exempt from the Oil SPCC requirements. See 40 C.F.R. § 112.1(d)(2) and (d)(4). Facilities with underground oil storage capacity not subject to the federal UST regulations in 40 C.F.R. Part 280, are subject to the requirements of the SPCC program. 67 Fed Reg 47064 (July 17, 2002).

[2] The USTs are exempt from the monthly inventory monitoring requirements outlined in 6 NYCRR § 613.4, as well as the testing and monitoring requirements outlined in 6 NYCRR § 613.5 because the tanks store No. 6 fuel oil. However, SLU is instituting a program of leak monitoring, periodic integrity and leak testing as requirement of this Oil SPCC Plan per 40. C.F.R. § 112.7(d), and § 112.8(c)(4).

2. the Plan includes a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful; and
3. for bulk storage containers, such as these USTs, both periodic integrity testing of the containers and periodic testing and leak testing of the valves and piping are conducted. The UST periodic testing protocol and schedule is detailed in section 4.9.

See 40 C.F.R. §§ 112.7(d).

The SLU Oil Spill Contingency Plan, that includes the specified criteria outlined in 40 C.F.R. § 109.5, is provided in Chapter 6 of this Oil SPCC Plan. The written commitment of manpower, equipment and materials to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Section 1.6 of the Plan. The specific details on the periodic integrity testing of the USTs, and the periodic testing and leak testing of the associated valves and piping are provided Section 4.9.

3.2 ABOVEGROUND OIL STORAGE TANKS

SLU maintains: five (5) ASTs for the storage of No. 2 fuel oil, diesel and unleaded gasoline on the main campus; a single diesel AST at the Grass River Pump House; and three (3) ASTs for the storage of gasoline and diesel oil at the SLU Golf Course. See Table 3-1 and Figure 2-2.

3.2.1 Central Heating Plant AST

The Central Heating Plant maintains a 1,000 gallon AST (tank #3, DEC tank # 022) for the storage of No. 2 fuel oil. This AST was installed in 2001, and is used to flush the #6 fuel oil lines to the boiler and an emergency generator. The tank is double walled and equipped with an interstitial monitoring system, product level gauge, overfill spill protection around the fill port, and an emergency shut-off switch. The fill port on the tank is locked when not in use. The AST is located inside the heating plant building. Spill response equipment is located in the ASTs' general area.

3.2.2 Facilities Operations Center ASTs

The Facilities Operations Center maintains a 1,000 gallon unleaded gasoline AST (tank #4, DEC tank #017) and a 500 gallon diesel AST (tank #5, DEC tank #018) for fueling SLU Facilities Department vehicles and equipment. These ASTs were installed in 1996. The tanks are double walled and equipped with interstitial monitoring systems, product level gauges, overfill spill protection around the fill ports, and emergency shut-off switches. All piping associated with the ASTs is above ground. The emergency shut-off switch is located inside the fleet maintenance shop on the wall opposite the tanks. The fill ports on the tanks, and dispensers are locked when not in use. The tanks are mounted on a concrete pad surrounded by bollards to protect the ASTs from vehicular traffic. Only designated SLU personnel have access to dispense fuel from the tanks. Spill response equipment is located adjacent to the AST's.

3.2.3 Emergency Generator AST

SLU maintains three (3) stationary diesel generators; one is outside of the old indoor firing range at Madill Hall, and is fueled by a 100 gallon AST (tank #10). The other two (2) generators, #11 at Brown Hall (200 gallon double walled JRS) and #12 at the Student Center, are located just outside each building. The AST's are mounted into the base of the generator units and any release from a fuel line would be

contained within the generator's containment system. The tank fill ports are located within the generator units. Spill response equipment is located in the ASTs' general area.

3.2.4 Mobile AST

SLU maintains one mobile above ground storage tank that is stored on the back side of the Grounds equipment shed in a lean-to where the generators are stored. This mobile tank is a 200 gallon steel AST that stores diesel fuel. The AST is mounted to a trailer so that diesel fuel can be transported to the emergency generators in case their main fuel supply is interrupted. The tank fill port is located on the top of the AST. Spill response equipment is located in the ASTs' general area.

3.2.5 Grass River Pump House AST

SLU maintains a 285 gallon AST (tank # 9) that stores diesel fuel for an irrigation pump. The AST is located inside the Grass River Pump House Building adjacent to the Grass River. The building is locked when unoccupied. The AST is located adjacent to the pump within a diked concrete secondary containment structure.

3.2.6 Golf Course ASTs

One 300 gallon AST storing unleaded gasoline (tank #6) and one 300 gallon AST storing diesel (tank #7) are located on the SLU Golf Course adjacent to the Maintenance Building. These ASTs are used to fuel golf course equipment and vehicles, as well as an interim staging area for the transfer of fuel to the Golf Course Pump House AST. These ASTs are located within a diked concrete secondary containment structure to prevent a potential release of oil. The ASTs are equipped with hand pump dispensers used to transfer the oil to the golf course equipment and into 5 gallons containers for transport to the pump house ASTs.

A single 500 gallon AST is located within the Golf Course Pump House Building that is used to fuel a diesel irrigation pump. The AST is located adjacent to the generator within a diked concrete secondary containment structure. The piping between the AST and the generator is underground and copper. The building is locked when unoccupied.

3.3 OIL FILLED TRANSFORMERS

There are a total of sixteen (16) oil filled transformers on the SLU campus in nine different locations at the campus. None of the transformers at SLU contain PCBs or are reported to be greater than 55 gallons in capacity. As such, the transformers at SLU are not subject to SPCC requirements under 40 C.F.R. § 112.

3.4 HYDRAULIC OIL ELEVATORS

Fifteen elevators containing hydraulic oil at SLU are located in buildings across campus as identified in Table 3-2 and Figure 2-3. The volume of oil stored in each elevator is approximate based on measurements of potential capacity in the hydraulic reservoir tank. Secondary containment to control a potential spill from the hydraulic reservoirs servicing these elevators is provided within the elevator rooms. Ten elevator rooms do not have floor drains, however, five of the elevator rooms / locations are improved by nearby floor drains. These floor drains will be sealed, except during floor cleaning, by an

expandable plug. Oil-filled electrical, operating, or manufacturing equipment is not considered a "bulk storage container" per 40 C.F.R. § 112.2, and therefore, the hydraulic oil tanks associated with the elevators at SLU are only subject to the general secondary containment and/or diversionary structure equipment requirements of 40 C.F.R. § 112.7(c). The bulk oil storage container requirements of 40 C.F.R. § 112.8(c) do not apply to the elevator hydraulic oil tanks.

3.5 55 GALLON OIL DRUMS

SLU maintains three (3) 55 gallon drums to store used oil on campus. One used oil drum is located in the Central Heating Plant and two drums are located in the Facilities Operations Center garage bay. See Table 3- and Figure 2-2. All used oil drums are located on spill control pallets that provide sufficient secondary containment to control a potential release from these drums. Two (2) 55-gallon drums are also maintained in the Facilities Operations Center garage bay for the storage of motor oil. These drums are also stored on a spill control pallet to prevent a potential release of oil. Spill response equipment is located in the general area.

3.6 WASTE GREASE STORAGE

Waste cooking oil/grease is stored in the Dana Dining Hall at SLU in a 300 gallon mobile storage container located on the truck loading and unloading landing. Used waste cooking oil/grease is also stored in the new Student Center at SLU in a 300 gallon mobile storage container located on the truck loading and unloading landing. In addition, there is a 220 gallon capacity waste grease interceptor tank located in the Dana Dinning Hall kitchen that is part of the wastewater collection system discharging to the sewer system. See Table 3-4 and Figure 2-2. Spill response equipment is located in the ASTs' general area.

3.7 TANK PIPING SYSTEMS

The piping associated with the Central Heating Plant AST is single-walled above ground copper tubing enclosed in an insulating wrap. The AST piping is self-supported and has been properly designed and installed. The piping associated with the Facilities Operations Center AST is single-walled and above ground. The piping is painted steel. The piping associated with the Grass River Pump House AST is single-walled underground copper tubing. The piping associated with the Golf Course Pump House AST is single-walled aboveground copper tubing.

Fill ports are marked with the appropriate color and symbol code of the American Petroleum Institute (API).

3.8 TRANSFER AREAS

The oil transfer areas (i.e., the tank fill ports, waste kitchen grease and used oil drum storage area locations) at SLU are maintained and operated to prevent potential releases from entering drains or surface water. Specifically, prior to oil transfers where catch basins are located in the nearby vicinity, catch basin covers are employed to provide containment by the asphalt surfaces and prevent a spill or release from entering the storms ewer system. Also, oil transfers are monitored (see Section 4.3) and countermeasures are immediately taken if a release is imminent or occurring. Spill response equipment is located in each of these areas. The bulk fuel transfer areas for the Central Heating Plant and the Facilities Operations Center are identified on the Facility Diagram in Figure 2-2. SLU does not have any oil loading/unloading racks and is therefore not subject to the requirements 40 C.F.R. § 112.7(h).

Table 3-1: St. Lawrence University Petroleum Bulk Oil Storage Tanks

Site Plan # (DEC Reg #)	Location	Total Storage (gallons)	Contents	Material of Construction	Means of Secondary Containment	Means to Prevent Spill	Direction and Rate of Flow of Potential Spill
Underground Storage Tanks							
1 (012A)	Central Heating Plant	20,000	No. 6 Fuel Oil	Single Wall Steel	None	Regular inspection and testing, and electronic metered level indicator.	Oil released from the tank into the surrounding soil would flow downward into groundwater and then to the southeast towards the Little River. An oil spill during loading/unloading activities would flow down gradient to the south towards the storm drain approximately 90 feet away.
2 (012B)	Central Heating Plant	20,000	No. 6 Fuel Oil	Single Wall Steel	None	Regular inspection and testing, and electronic metered level indicator.	Oil released from the tank into the surrounding soil would flow downward into groundwater and then to the southeast towards the Little River. An oil spill during loading/unloading activities would flow down gradient to the south towards the storm drain approximately 90 feet away.
Aboveground Storage Tanks							
3 (022)	Central Heating Plant	1,000	No. 2 Fuel Oil	Double Wall Steel	Double walled tank w/ interstitial monitoring system	Regular inspection and testing, interstitial space alarm, automatic shutoff valve and overfill alarm.	Release from tank would flow into tank's interstitial space. Spill during loading/unloading activities would flow to the south towards the storm drain approximately 90 feet away. Rate of flow ≅ 2 fps.
4 (017)	Facilities Operations Center	1,000	Diesel	Double Walled Steel	Double walled tank w/ interstitial monitoring system	Regular inspection and testing, interstitial space alarm, automatic shutoff valve and overfill alarm.	Release from tank would flow into tank's interstitial space. Spill during loading/unloading activities would flow onto pavement to the northeast towards a catch basin approximately 25 feet away. Rate of flow ≅ 2 fps.

Site Plan # (DEC Reg #)	Location	Total Storage (gallons)	Contents	Material of Construction	Means of Secondary Containment	Means to Prevent Spill	Direction and Rate of Flow of Potential Spill
5 (018)	Facilities Operations Center	500	Unleaded Gasoline	Double Walled Steel	Double walled tank w/ interstitial monitoring system	Regular inspection and testing, interstitial space alarm, automatic shutoff valve and vent whistle.	Release from tank would flow into tank's interstitial space. Spill during loading/unloading activities would flow onto pavement to the northeast towards a catch basin approximately 25 feet away. Rate of flow ≅ 2 fps.
6	Golf Course	300	No. 2 Fuel Oil	Single Walled Steel	Concrete Dike	Regular inspection and testing, and vent whistle.	Spill from tank would be contained within secondary containment dike.
7	Golf Course	300	Diesel	Single Walled Steel	Concrete Dike	Regular inspection and testing and vent whistle.	Spill from tank would be contained within secondary containment dike.
8	Golf Course Pump House	500	Diesel	Single Walled Steel	Concrete Dike	Regular inspection and testing and vent whistle.	Spill from tank would be contained within secondary containment dike.
9 (019)	Grass River Pump House	285	Diesel	Single Walled Steel	Concrete Dike	Regular inspection and testing and vent whistle.	Spill from tank would be contained within secondary containment dike. Spill during loading/unloading activities would flow to grassy area in vicinity of tank and then west to groundwater and/or to the Grass River. Rate of flow ≅ 2 fps.
10 (020)	Outside Madill Hall	100	Diesel	Single Walled Steel	Generator built-in containment	Regular inspection and testing and vent whistle.	Spill from tank would be contained within the generator containment system. Spill during loading/unloading activities would flow to the parking lot where spill could be contained. Rate of flow ≅ 2 fps.

Site Plan # (DEC Reg #)	Location	Total Storage (gallons)	Contents	Material of Construction	Means of Secondary Containment	Means to Prevent Spill	Direction and Rate of Flow of Potential Spill
11 **(021)**	Student Center Generator	150	Diesel	Single Walled Steel	Generator built	Regular inspection and testing and vent whistle.	Spill from tank would be contained within the generator containment system. Spill during loading/unloading activities would flow between the student center and Heating Center where spill could be contained. Rate of flow ≅ 2 fps.
12 **(022)**	Brown Hall Blue Generator for Johnson Hall	150	Diesel	Single Walled Steel	Generator built	Regular inspection and testing and vent whistle.	Spill from tank would be contained within the generator containment system. Spill during loading/unloading activities would flow to a grass landscaped area where spill could be contained. Rate of flow ≅ 2 fps.
N/A	Grounds Equipment shed	200	Diesel	Single Walled Steel	None	Regular inspection and testing and vent whistle.	Spill from tank would flow onto the unpaved gravel road and grass/soil outdoor equipment storage area where spill could be contained. Rate of flow ≅ 2 fps.

Table 3-2: St. Lawrence University Hydraulic Elevators

Site Plan	Building	Total storage (gal)*	Oil Type	Floor Drains in Vicinity	Secondary Containment	Direction and Rate of Flow of Potential Spill
E1	Newell Fieldhouse	80	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E2	Appleton Ice Arena	80	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E3	Madill Science Library	81	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E4	Dana Dining Hall	80	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E5	Hepburn	110	Hydraulic Oil	Yes	Elevator room with expandable plugs in floor drain(s)	Oil would be contained within building. Rate of flow ≅ 2 fps.
E6	Whitman	190	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E7	New Student Ctr.	140	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E8	Bewkes	190	Hydraulic Oil	Yes	Elevator room with expandable plugs in floor drain(s)	Oil would be contained within building. Rate of flow ≅ 2 fps.
E9	Brewer Bookstore	80	Hydraulic Oil	Yes	Elevator room with expandable plugs in floor drain(s)	Oil would be contained within building. Rate of flow ≅ 2 fps.
E10	Augsbury Pool	110	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E11	Carnegie	140	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.

Site Plan	Building	Total storage (gal)*	Oil Type	Floor Drains in Vicinity	Secondary Containment	Direction and Rate of Flow of Potential Spill
E12	ODY Library (on roof off stairway B)	80	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E13	ODY Library (in basement mechanical room)	110	Hydraulic Oil	Yes (2 floor drains)	Elevator room with expandable plugs in floor drain(s)	Oil would be contained within building. Rate of flow ≅ 2 fps.
E14	Noble Old Student Ctr.	190	Hydraulic Oil	No	Elevator room	Oil would be contained within building. Rate of flow ≅ 2 fps.
E15	Payson	80	Hydraulic Oil	Yes (20 ft away)	Elevator room with expandable plugs in floor drain(s)	Oil would be contained within building. Rate of flow ≅ 2 fps.

*The volume of oil stored in each elevator is approximate based on measurements of potential capacity in the hydraulic reservoir tank.

Table 3-3: St. Lawrence University 55 Gallon Oil Drum Storage

Site Plan #	Building	Oil Type	Quantity	Secondary Containment	Direction and Rate of Flow of Potential Spill
D1	Facilities Operations Center	Motor Oil	55 gallons Per drum	Spill pallet w/ 110% containment capacity	Oil would be contained within the secondary containment pallet.
D2	Facilities Operations Center	Used Oil	55 gallons Per drum	Spill pallet w/ 110% containment capacity	Oil would be contained within the secondary containment pallet.
D3	Central Heating Plant	Used Oil	55 gallons	Spill pallet w/ 110% containment capacity	Oil would be contained within the secondary containment pallet.

Table 3-4: St. Lawrence University Waste Grease Storage

Site Plan #	Building	Quantity	Secondary Containment	Direction and Rate of Flow of Potential Spill
WG1	Dana Dining Hall	300 gallon mobile storage container	None	Release from container or during loading/unloading would flow onto pavement to the east towards a catch basin approximately 20 feet away. Rate of flow ≅ 0.5 fps.
WG2	Dana Dining Hall	220 gallon capacity waste grease interceptor tank (part of sewer collection system)	None	Within sewer system.
WG3	New Student Center	300 gallon mobile storage container	None	Release from container or during loading/unloading would flow onto pavement to the east towards a catch basin approximately 20 feet away. Rate of flow ≅ 0.5 fps.

4. OIL SPILL PREVENTION CONTROLS

4.1 GENERAL SPILL PREVENTION STRATEGY AND TRAINING

The primary method of spill management at SLU is to prevent spills in the first place. Prevention of spills has been emphasized through the proper design of containment systems, the training of personnel, and regular inspections.

All University personnel involved with the use of oil are trained to report oil leaks from tanks, containers, and oil-containing equipment so that early corrective action can be initiated. In addition, employees are trained to contain spills they discover using appropriate methods and equipment, assuming containment can be done without risk, until emergency response personnel with specialized response training respond.

Personnel involved in the unloading, storage and use of oil products are trained in the proper methods to handle, contain and report spills. Maintenance personnel are trained to watch for any unusual conditions that may precede the loss of materials from equipment or systems.

In addition, SLU has an addendum to this SPCC Plan that is to be completed by all contractors in charge of any construction projects taking place on campus, at any time, which involves bringing petroleum products in volumes in excess of 55 gallons onto St. Lawrence University (SLU) property. This addendum must be completed and all provisions of the addendum implemented before any contractor stores any petroleum product at the project site for one day or more.

4.2 TANK CONSTRUCTION

All bulk oil storage containers at SLU are constructed of material that is compatible with the product stored and are designed in accordance with good engineering practices to avoid spills. Tank construction details and secondary containment systems are presented in Chapter 3.0 and Table 3.1. The prompt correction of visible leaks, and the prompt removal of oil in accumulated diked areas is provided for and presented in Chapter 6.

4.3 OIL TRANSFER AND DELIVERY PROCEDURES

Tank truck unloading at the SLU campus consists primarily of bulk deliveries of No. 6 fuel oil, No. 2 fuel oil, gasoline, and diesel to the respective storage tanks. All fill piping is either mounted or affixed to building walls or is protected from vehicular traffic using bollards (ASTs) or manhole covers (USTs).

SLU's contract with the fuel oil delivery company stresses that the delivery company is responsible for compliance with all Department of Transportation (DOT) standards and SLU's oil transfer and delivery procedures as well as observing the entire offloading process to minimize the potential for oil releases. The following general procedures and practices shall be followed with respect to tank filling procedures:

1. Tank filling operations are always attended. The delivery driver attends the pump for all deliveries during the entire delivery process and visually inspects drains and outlets in the vicinity prior to filling and departure. SLU personnel are not necessarily present when fuel oil is delivered to tanks on campus, but they do conduct spot-checks to confirm that the delivery driver remains present during the entire delivery process. The driver, operator, or attendant of the delivery tank is contractually obligated to not leave the vehicle while fuel oil is being discharged, and is trained to understand the locations and uses of the spill containment and response equipment maintained on-site by SLU.

2. Tank filling operations are performed during daylight hours. If tank filling operations must be performed at night, they are performed only under suitable lighting conditions.
3. Tank filling operations are performed only at designated fill pipe locations. Drivers have been notified as to the location of fill pipes and aboveground piping.
4. Smoking, cell phone use, lighting matches, or carrying any flame near the delivery truck during filling operations are not permitted.
5. All liquid levels in tanks are checked by the delivery driver prior to filling to verify the amount of oil to be delivered.
6. The delivery driver covers the catchbasins adjacent to the Central Heating Plant, the Facilities Operations Center, and the emergency generators outside of Madill Hall *before* beginning to off-load fuel. A catch basin cover surrounded by oil-absorbent socks must be in place before filling the tank, and the driver must confirm that a spill kit is nearby and ready for use, if needed.
7. To prevent truck departure prior to line disconnection, the delivery driver ensures that the line is disconnected before departing. The delivery operator also makes sure that all the outlets and valves on the truck are in the locked position before driving off.

4.3.1 Drum Loading/Unloading

Any loading or unloading of 55-gallon drums by SLU personnel is performed in accordance with the Department of Transportation (DOT) requirements for loading and unloading pursuant to 49 C.F.R. § 177.834 and § 177.837.

The following general procedures and practices are observed by SLU personnel, as applicable, with respect to drum loading/unloading:

1. Drum covers are secured and tightened prior to moving.
2. Surrounding floor is clean and dry prior to removing drums from pallets/containment or placing drums on pallets/containment.
3. Ramps and proper tools (i.e., dollies, forklifts) are used to lift drums from on top of pallets to ground level (or vice-versa).
4. Tools that could puncture the drum are not used during drum movement.
5. Supplies of oil absorbents are readily available during drum movement activities (See Section 4.12).
6. Floor drains, and drainage pathways are protected with booms and/or drain covers/mats during removal activities.

4.4 OIL STORAGE TANK INSPECTION AND TESTING PROCEDURES

As discussed in Chapter 3, SLU stores oil in aboveground and underground storage tanks and drums. To reduce the potential of oil releases from occurring and as required by 40 C.F.R. § 112.8(c)(6), SLU conducts visual inspections combined with another testing technique for each tank and drum with a

capacity of 55 gallons or more.[3] The following sections describe SLU's inspection and testing program. All inspection and testing records are maintained by the EHS Department for ten years. See 40 C.F.R. § 112.7(e) and 6 NYCRR § 613.6 (c) (1).

SLU's program consists of:

- **Monthly and Annual Visual Inspections** of all ASTs performed by designated SLU personnel;
- **Formal External Inspections and Leak Tests** of shop-fabricated ASTs performed, as needed, by a qualified tank inspector;
- **Monthly Inspections of USTs** performed by designated SLU personnel;
- **Integrity Tests of ASTs** performed, as needed, by a qualified tank tester;
- **Periodic Integrity Tests of USTs** performed by a qualified tank tester;
- **Regular Testing of Devices** to ensure that equipment remain in good working order; and
- **Inspection and Maintenance of Drums**.

If the results of an inspection or test indicate evidence of leakage or significant deterioration of a tank or container, or improper operation of associated devices, SLU will remove the tank, container or device from service and either repair or replace it.

4.5 INSPECTION AND TESTING OF SHOP-FABRICATED ASTS

The elements of SLU's AST inspection and testing program for shop-fabricated ASTs were developed in accordance with the Steel Tank Institute's (STI's) "Standard for the Inspection of Aboveground Storage Tanks," SP001, 4th Edition (July 2006).

4.5.1 Monthly and Annual Visual Inspections

Designated SLU personnel perform monthly and annual visual inspections of all ASTs and drums that have oil storage capacities equal to or greater than 55 gallons, in accordance with the STI SP001 standard, to comply with the requirements of the Oil SPCC regulations and 6 NYCRR § 613.6(a). Tank equipment (i.e., gauges, valves, alarm/warning systems) is inspected for evidence of maintenance deficiencies and periodically tested to ensure that it remains in good working order. See 6 NYCRR § 613.3(d).

Monthly and annual inspections are performed by designated personnel who have been trained to perform the inspections per the STI SP001 standard. The monthly inspection sheets used for the inspections of ASTs, USTs, 55-gallon drums are provided in Appendix A.

Monthly inspection reports include the following information as required by 6 NYCRR § 613.6(c)(2):

- Facility registration number;
- Identification number for tank inspected;
- Date of inspection;

[3] Oil-filled electrical and operating equipment (i.e., hydraulic elevators) are not considered bulk storage containers for these purposes, and are therefore not subject to the inspection and testing requirements.

- Results of inspection including a report on the need for repair;
- Certification by the inspector that the inspection has been performed in a manner consistent with 6 NYCRR § 613.6;
- Address of inspector; and
- Signature of inspector.

4.5.2 Formal External Inspections and Leak Testing

Shop-fabricated AST systems are potentially subject to formal external inspection and leak testing requirements (as defined by the STI SP001 standard and performed by a certified tank inspector) according to the capacity of the tank, the means of secondary containment, and the presence of a continuous release detection method.[4] Because SLU's ASTs have a capacity of less than 5,001 gallons, have secondary containment, and are provided with a continuous release detection method through visual observations, formal external inspections and leak testing by a STI qualified tank inspector are not required on a routine basis.

4.5.3 Tank Integrity Tests of ASTs

SLU will retain the services of a qualified tank testing contractor to perform a tank integrity test in accordance with the STI Standard SP001, API Standard 653, or other industry standard determined by the tank tester to be appropriate for the type of tank, under the following circumstances:

- Whenever material repairs or alterations are made to the tank;
- If evidence of a leak is detected;
- In the event of damage to the tank or containment structure; or
- If the results of a tank inspection reveals evidence of leakage or deterioration.

An affected tank will remain out of service until it is repaired and tested to confirm its integrity or it is otherwise replaced.

4.6 REGULAR TESTING OF DEVICES

In addition to the frequent visual inspections, SLU will perform regular testing of devices for all equipment associated with oil storage. For example, high level alarms (vent whistles) and product level gauges will be periodically tested or inspected for proper operation in accordance with the manufacturer's instructions to ensure they are in working order.

4.7 55-GALLON DRUM INSPECTIONS

This section describes the usual and customary business practices used to satisfy the integrity testing requirements for the 55-gallon drums at the SLU. SLU ensures that 55-gallon drums are visually

[4] A continuous release detection method is defined under STI as a means of detecting a release of liquid through inherent design. It can be passive, such as visual detection, but must be designed in accordance with good engineering practice.

inspected on a monthly basis. The scope of the visual inspection is provided in the inspection sheet included as in Appendix A.

SLU uses plastic and steel 55-gallon drums to contain virgin petroleum products, waste kitchen grease, and used oil. The following usual and customary business practices are followed to ensure the integrity of 55-gallon drums:

- **Retirement Schedule.** All 55-gallon drums are retired after 5 years of use.
- **Loading/Unloading Procedures.** To ensure that drum loading and unloading procedures are performed in a way that is protective of the drums and their contents, it is SLU's policy that such activities be conducted in accordance with Department of Transportation (DOT) requirements for loading and unloading as described in Section 4.3.1.
- **Replacement and Disposal.** If monthly visual inspections or informal inspections reveal that a drum is leaking, severely dented, corroded, or compromised in some way, SLU will immediately transfer the oil in the drum to a new drum and ensure that the empty drum is disposed of.

4.8 OPERATING EQUIPMENT INSPECTIONS

SLU personnel conduct informal inspections of oil-filled operating equipment on campus during rounds that are conducted on a daily basis. The hydraulic elevators are inspected by the service contractor (Otis) on a periodic basis and records of these inspections are provided to SLU.

4.9 UST INSPECTIONS AND TESTING

4.9.1 UST Inspections and Periodic UST Integrity Testing

Monthly UST Inspections

SLU implements a monthly UST inspection and monitoring schedule. Each monthly inspection includes a tank inventory assessment which includes an assessment of the presence of water, oil use, deliveries, inventory on hand, and any unexplained losses or gains. Records of the inspections/tests are maintained for ten (10) years. Appendix A contains the Monthly UST Inspection Log - Form A-2 utilized by SLU.

If the monthly inspections show an inventory loss, a recurring accumulation of water in the bottom of the tanks, or apparent significant product losses or gains, SLU will initiate an investigation into the possible causes. If within 48 hours, the causes cannot be explained by inaccurate recordkeeping, temperature variations, or other factors not related to leakage, SLU will notify the DEC and take the tank out of service in accordance with 6 NYCRR § 613.9(a) until such time that inspection and or tightness tests are performed, the cause is determined and necessary repairs or replacements are made.

Periodic UST Integrity Testing

In May 2008, tightness tests were performed on the two USTs at SLU (See Appendix G). Both USTs passed the tank tightness tests. This Plan establishes a schedule for future periodic integrity testing and leak testing to ensure that the USTs remain intact. The periodic tightness testing protocol, every five years, beginning after the tightness test, will ensure that if any part of the two UST systems are not tight, those components of the systems, including the tanks, will be promptly replaced or repaired.

All tightness testing will be performed by a technician who has an understanding of variables which affect the test, and is trained and certified in performing UST integrity tests. The test will determine if the tank is tight or not tight, and must be capable of detecting a tank or piping leak as small as 0.05 of a gallon in one-hour accounting for variables such as vapor pockets, thermal expansion of product, temperature stratification, groundwater level, evaporation, pressure and end deflection.

Any part of the UST system that is not tight will be promptly emptied, replaced or repaired in accordance with 6 NYCRR Part 614 or taken out of service and closed in accordance with 6 NYCRR § 613.9.

4.10 DISCHARGE OF WATER FROM SECONDARY CONTAINMENT

The two 300-gallon ASTs (tanks #6 & 7) at the Golf Course are located outdoors adjacent to the Maintenance Building within a concrete secondary containment structure which will accumulate some rain and snow. When a significant amount of precipitation (i.e., a volume of water that would impact the containment capacity required for the tank) accumulates in the containment, it will be discharged and documented according to the procedures in Appendix F. The secondary containment drain valve is kept closed at all times, except when a monitored discharge is taking place according to the prescribed procedures.

4.11 PERSONNEL TRAINING

4.11.1 Oil SPCC Training

SLU implements training related to petroleum product handling facility. This program complies with 40 C.F.R § 112.7(f)(1) and is intended to train personnel in the proper operation and maintenance of equipment to prevent oil spills and to train personnel to be aware of applicable laws, rules, and regulations. SLU's Oil SPCC training program instructs employees involved with the handling of petroleum products and/or petroleum product containment devices, structures, and equipment on: operation and maintenance of equipment to prevent discharges of oil; applicable oil pollution control laws and rules; and specific elements of this Plan.

In addition, the Oil SPCC training program covers the following:

- Instructions regarding SLU's spill prevention policy and procedures to follow in the event of an oil spill;
- Special cleanup instructions (including identification and efficient use of available spill equipment); and
- Instructions regarding applicable oil pollution control laws and proper operation and maintenance of spill prevention equipment.

4.11.2 Spill Prevention Briefings

The designated person responsible for spill prevention is the Chemical Hygiene/Environmental Compliance Officer, as the primary Oil SPCC On-Site Coordinator. Spill prevention briefings are conducted by the SLU Facilities Operations Department on at least an annual basis to assure adequate understanding of SLU's Oil SPCC Plan. The Director of Facilities is responsible for identifying staff that require training, and the EHS Department maintains records for all personnel that receive Oil SPCC Plan training.

4.12 SPILL CONTROL EQUIPMENT

All visible spills are immediately stopped and cleaned up using response equipment such as Speedi-Dry, and absorbent booms and pads, which are stored at the Facilities Operations Center and the Central Heating Plant. Spill control equipment is used only by trained personnel who are familiar with the hazards posed by the spilled material and are knowledgeable of how to manage the spill cleanup residue. Supplies of spill control equipment are periodically inspected by the Director of Campus Support Services and/or the EHS Department to ensure that they are fully stocked and ready for use in the event of an oil spill. If, during an inspection, items are noted as missing or substantially depleted, the missing contents are ordered and replaced as soon as reasonably possible.

4.13 SITE SECURITY

Current regulations pertaining to the outline of security measures required by a facility subject to SPCC regulations are set forth in 40 CFR 112.7(e)(9). Specifically, these regulations state:

(i) All plants handling, processing, and storing oil should maintain locked entrance gates and/or be guarded when the plant is not in production or is unattended;

(ii) The master flow and drain valves and any other valves that will permit direct outward flow of the tank's content to the surface should be securely locked in the closed position when in non-operating or non-standby status.

(iii) The starter control on all oil pumps should be locked in the "off" position or located at a site accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.

(iv) The loading/unloading connections of oil pipelines should be securely capped or blank-flanged when not in service or standby service for an extended time. This security practice should also apply to pipelines that are emptied of liquid content either by draining or by inert gas pressure.

(v) Facility lighting should be commensurate with the type and location of the facility. Considerations should be given to: (A) discovery of spills occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.) and (B) prevention of spills occurring through acts of vandalism.

Prevention of unknown entry and access to the SLU is accomplished by several methods such as:

- All Buildings are locked after normal college hours;
- The Cogen plant is locked at all times and accessible by only designated personnel;
- All aboveground storage tanks on the SLU main campus are located in areas that are locked, and/or the fill ports, dispensers, and transfer pumps are locked when not in use;
- All loading/unloading connections are locked when not in service;
- Fuel dispensing from gasoline and diesel ASTs at Facilities Operations is only authorized by designated employees who have access keys to the dispenser;
- Campus has sufficient lighting to promote adequate security; and

- SLU Security Officers perform periodic rounds of the campus to ensure facility security and protect students, faculty, staff, visitors, vendors, and resources.

Upon notification that an oil release has occurred, the Primary Facility Contact will designate certain employees to assist with perimeter security while the incident is assessed by the On-Site Coordinator. Designated employees will immediately restrict facility access to only essential emergency response personnel. All entry points will be secured immediately, if possible.

5. SPILL RESPONSE NOTIFICATION PROCEDURES

This section describes the roles and responsibilities of SLU's oil spill coordinators, lists the emergency contacts, describes the primary and back-up communication systems, and provides the spill response procedures. This section also describes how SLU notifies federal, state, and local agencies regarding reportable oil spills at or from the facility.

5.1 FACILITY CONTACTS ROLES AND RESPONSIBILITIES

The Oil SPCC chain-of-command identifies personnel that constitute SLU's emergency response team during an actual spill or discharge event. Each member of the emergency response team is made aware of his/her role and responsibility as well as those of other team members to ensure that the response plan functions efficiently. The Oil SPCC chain-of-command and responsibilities for SLU are as follows:

5.1.1 Primary Facility Contact

Contact information:

Dan Seaman
Director of Facilities Operations
(315) 229-5632
(315) 244-8345 cell

The responsibilities of the Primary Facility Contact include:

- Oversee the development, implementation, and maintenance of the Oil SPCC Plan and oil spill prevention program; and
- Identify any facility changes that would warrant amendments to the Oil SPCC Plan.

5.1.2 SPCC On-Site Coordinator

Contact information:

Suna Stone-McMasters
Chemical Hygiene/Environmental Compliance Officer
(315) 229-5105 office
(315) 386-2380 home

The responsibilities of the On-Site Coordinator are to:

- Assess the type, magnitude, and extent of an oil spill;
- Implement the Oil SPCC Plan upon discovery of a spill;
- Contact the facility responders to bring spill containment equipment to the spill location;
- Supervise facility responders during spill cleanup;
- Serve as the designated person responsible for oil spill prevention;
- Contact and coordinate, with local off-site first responders (i.e., fire, police, cleanup contractors listed in Table 5-1), if necessary;

- Provide emergency medical care or arrange transportation via ambulance for off-scene medical services, if necessary;
- Report any spill of a reportable quantity to the New York Department of Environmental Conservation (DEC) and the National Response Center;
- Coordinate, organize and/or conduct annual emergency spill response training for facility responders;
- Maintain the first-aid stations, fire extinguishers, and spill containment equipment; and
- Arrange for Oil SPCC training and annual briefings.

5.1.3 Alternate On-Site Coordinators

Contact information:

Rick Scott
Facilities Manager
(315) 229-5611
(315) 323-3640 (cell)

Ted Coviello
Director of Contracts, Compliance & Risk Management
(315) 229-5913
(315) 323-1766 (cell)
(315) 386-1400 (home)

Jim Kozsan
Trades Manager
(315) 229-5625
(315) 323-0384 (cell)
(315) 769-2267 (home)

Marcus Sherburne
Grounds Manager
(315) 229-5610
(315) 323-2419 (cell)
(315) 714-2336 (home)

The role of the Alternate On-Site Coordinator is: (1) to act as On-Site Coordinator whenever the Primary Coordinator is unable to perform his duties, or (2) to assist the On-Site Coordinator in the event of an actual spill or release event.

The Assistant On-Site Coordinator is familiar with the role and responsibilities of the Oil SPCC On-Site Coordinator as listed above in the event that he is called upon to act on his/her behalf during an actual spill emergency. The On-Site Coordinator may delegate any of the responsibilities listed above to the Alternate On-Site Coordinator.

Both the Primary and Alternate On-Site Coordinators periodically review the Oil SPCC Plan and understand their responsibilities accordingly. The Coordinators are trained as necessary to understand and implement the Oil SPCC Plan.

Table 5-1: Emergency Contact Phone Numbers for Oil Spills

SLU personnel	Facility Contact Dan Seaman, Director of Facilities Operations	Office: (315) 229-5632 Cell: (315) 244-8345
	Primary Oil SPCC Coordinator Suna Stone-McMasters, Chemical Hygiene/Environmental Compliance Officer	Office: (315) 229-5105 Home: (316) 2380
	Alternate Oil SPCC Coordinator Ted Coviello, Director of Contracts, Compliance & Risk Management	Office: (315) 229-5913 Cell: (315) 323-1766 Home: (315) 386-1400
	Alternate Oil SPCC Coordinator Rick Scott, Facilities Manager	Office: (315) 229-5611 Cell: (315) 323-3640 Home: (315) 769-7486
	Alternate Oil SPCC Coordinator Jim Kozsan Trades Manager	Office: (315) 229-5625 Cell: (315) 323-0384 Home: (315) 769-2267
	Alternate Oil SPCC Coordinator Marcus Sherburne Grounds Manager	Office: (315) 229-5610 Cell: (315) 323-2419 Home: (315) 714-2336
SLU Security	Campus Security	5555 or 229-5555
	Pat Gagnon, Director of Safety and Security	Office: (315) 229-5609 Cell: (315) 323-7832 Pager: (315) 386-4548
Police	Canton Police Department New York State Police	911 911
Fire	Canton Fire Department	911 or 386-4544
DEC Spill Hotline	New York Department of Environmental Conservation (NYDEC)	**(800) 457-7362**
Agencies	US Coast Guard – Oil Spill National Response Center USEPA, Region 2, Albany, New York NYDEC Region 6, Utica, New York	(800) 424-8802 (800) 424-8802 (315) 457-2554
Emergency Response Contractor	OP-Tech Environmental Services	Office: (315) 764-1917

5.2 OIL SPILL NOTIFICATION

5.2.1 Immediate Oral Notifications

Oil Releases to Water

If any oil, including a petroleum product, is released to an environmental receptor such as navigable water or a storm drain and creates sheen, the SPCC On-Site Coordinator will immediately report the incident to:

A. New York Department of Environmental Conservation (DEC) Spill Hotline (518) 457-7362

B. National Response Center (NRC) (800) 424-8802

The NRC Operator will notify U.S. Coast Guard, District 1 and

USEPA Region 2, as appropriate.

Oil Releases to Land

If more than 5 gallons of oil is released to a land area that is contained or less than 5 gallons is released but the cleanup cannot be completed within 2 hours, the release will be reported to the DEC at (518) 457-7362 within **two hours**.

In addition, if the results of an inventory record, test or inspection indicate that a tank is leaking oil, or a spill or discharge of petroleum product is discovered, the DEC will be notified within 2 hours. See 6 NYCRR § 613.8.

5.2.2 Written Notifications

Federal

If SLU (1) discharges more than 1,000 gallons of oil into or upon navigable waters or adjoining shorelines in a single spill event; or (2) discharges more than 42 gallons of oil in harmful quantities into or upon navigable waterways or adjoining shorelines in two spill events within any twelve month period, it will file a written report with EPA Region 2 within 60 days from the time either (1) or (2) occurs. See 40 C.F.R. § 112.4(a). A harmful quantity of spilled oil is defined by 40 C.F.R. Part 110 as an amount that would meet one of the following criteria:

- Violation of applicable water-quality standards;
- Production of a film, sheen or discoloration on the water surface or adjoining shoreline; or
- Deposition of a sludge or emulsion beneath the water surface or upon the adjoining shoreline.

If any of the above criteria are met, SLU must file a written report with EPA Region 2 within 60 days. This written report will contain the following information:

- The name of the facility;
- The name of the facility's owner/operator;
- The facility's location;
- The date and year when the facility began operations;
- The facility's maximum oil storage or handling capacity, and the normal daily quantity of throughput;

- A description of the facility, including site maps, topographical maps and flow diagrams;
- A complete copy of this Oil SPCC Plan and any revisions;
- The cause(s) of the spill, including a failure analysis of the system or subsystem responsible for the spill;
- The corrective actions/countermeasures undertaken, including an adequate description of equipment repairs/replacements;
- Additional preventive measures implemented or contemplated to minimize the potential for recurrence; and
- Any other information that the Regional Administrator may reasonably require that is pertinent to the Oil SPCC Plan or spill.

40 C.F.R. §112.4(a).

SLU will amend this Oil SPCC Plan if amendments are necessary as a result of the discharge(s). In addition, SLU will send a duplicate of the above information to oil pollution control personnel at DEC, if required by EPA. See 40 C.F.R. § 112.4(a).

Except as noted above, no written report is generally required for an oil spill. However, the agencies notified verbally of the spill may request a written follow-up report of the incident. An accurate record of any such incident will be maintained by the EHS Department, who will submit a written report to the appropriate agencies if requested to do so.

6. OIL SPILL CONTINGENCY PLAN

This chapter identifies SLU's oil spill cleanup equipment, describes oil spill response procedures, assigns responsibilities, and identifies outside responders who may be contacted in the event of an oil release. This chapter also describes disposal procedures for material recovered from an oil release and provides contact information for potential responders. This chapter satisfies the requirements of 40 C.F.R. § 112.7(a)(3)(iv), (v), and (vi); and a majority of the requirements of 40 C.F.R. § 109.5. General oil spill response procedures are provided in this chapter, followed by specific procedures organized by type of release.

6.1 OIL SPILL EQUIPMENT

SLU is equipped with strategically placed spill kits containing absorbent cleanup materials (Speedi-Dry, absorbent pads, sand buckets/containers, absorbent booms and drain covers) that will generally be used to contain and clean up minor spills. In the event of a minor oil release, it is SLU's policy to place absorbent booms and/or drain covers/mats on all floor drains, catch basins, and any other drainage pathway to prevent dispersion. Oil spill kits at SLU are available in the following locations:

- Facilities Operations Center;
- The Central Heating Plant;
- Dana Dining Hall
- Madill Hall
- Grass River Pump House
- Golf Course Maintenance Building
- Student Center

6.2 GENERAL OIL SPILL RESPONSE

Activities that could potentially result in an oil spill at SLU include:

- Overfill during delivery;
- Tank failure;
- Oil-filled transformer failure;
- Vehicle accidents; and
- Minor surface spills during routine maintenance.

The following oil spill response procedures should be followed for all spills (some activities occur simultaneously):

- Report incident to the Oil SPCC Coordinator.
- The Oil SPCC Coordinator investigates the incident to determine if outside assistance is necessary.
- Call outside responders if necessary.

- Restrict access to impacted and threatened areas.
- Avoid contact with spilled product.
- Keep unprotected personnel upwind of spill area.
- Eliminate ignition sources that may be present.
- Prevent released material from entering sewers and confined spaces.
- Choose clean-up equipment, where possible, that will not be corroded or otherwise damaged by the spilled product. Use explosion-proof and spark-proof equipment, where necessary.
- Determine if a reportable incident has occurred and facilitate reporting as required by state or federal law.

When spilled material has been recovered, it is disposed of in accordance with all applicable requirements.

6.3 TANK OVERFILL DURING DELIVERY

In the event of a minor spill as a result of an overfill during delivery, or any release of oil with a total volume below the reportable quantities summarized in Section. 5.2, absorbent pads and booms, mops, and Speedi-Dry will be used by SLU personnel for cleanup. The used cleanup materials will be collected and contained in buckets or containers for proper disposal. In all cases, spill cleanup residue must be collected in a container, characterized as either hazardous or non-hazardous waste, clearly labeled in accordance with that characterization, and properly stored prior to transport/disposal by an appropriately licensed (hazardous or non-hazardous) waste hauler/disposal facility. If the release impacts exposed soil, the stained ground surface area (soil) shall be removed using non-sparking tools and collected in a container, characterized as either hazardous or non-hazardous waste, clearly labeled in accordance with that characterization, and properly stored for transport and disposal by appropriately licensed contractors.

6.4 TANK FAILURE

In the case of visual evidence of a tank failure which results in a minor spill, absorbent materials will be used to contain and cleanup the spill as described above in Section 6.2.

If any inspection reveals a leak, a tank or equipment deficiency, a weakness when the tank is filled with oil, or any other deficiency which could result in failure of the tank system to function properly or store and contain the product, remedial measures will be taken to eliminate the leak or deficiency. The SPCC On-Site Coordinator shall immediately contact the emergency contractor, OP-Tech, to pump out the AST. The AST will remain out of service until the tank is repaired or replaced.

6.5 VEHICLE ACCIDENTS

In the event of a vehicle accident in which a minor spill of oil occurs, absorbent materials shall be used immediately to contain and cleanup the spill. Absorbent booms will be placed around catch basins and other drainage pathways to prevent dispersion. Used cleanup materials shall be collected and contained in buckets or containers for proper disposal. If a spill occurs in an unpaved area, the stained ground surface area (soil) shall be removed using non-sparking tools and collected in a container, characterized as either

hazardous or non-hazardous waste, clearly labeled in accordance with that characterization, and properly stored for transport and disposal by appropriately licensed contractors.

6.6 MINOR SPILLS

Incidental spills may occur as a result of routine maintenance activities. Minor spill response materials (i.e., absorbents, spill pads, absorbent clay, etc.) shall be used, managed and disposed of in accordance with the procedures defined in Section 6.2. If the spill occurs in an unpaved area, the stained ground surface (soil) shall be removed using non-sparking tools, and collected and properly disposed of.

Note: Responses to incidental releases of hazardous substances where the substance can be absorbed, neutralized or otherwise controlled at the time of the release by employees in the immediate release area, or by maintenance personnel are not considered to be emergency responses within the scope of the Standard Responses to releases of hazardous substances where there is no potential safety or health hazard (i.e. fire, explosion, or chemical exposure).

6.7 LARGE QUANTITY SPILLS

In the case of spills in excess of the reportable threshold quantities identified in Section.5.2.1, the SPCC On-Site Coordinator must notify the DEC as specified. In the case of spills that are beyond the control of SLU personnel and the standard cleanup/control methods discussed above, the SPCC On-Site Coordinator shall immediately contact the local fire department and/or the emergency cleanup contractor, and initiate the oil spill contingency plan.

It should be noted that SLU does not respond to spills large enough or that present characteristics making the spill a non-incidental release. Thus, SLU does not engage in emergency response operations as described in 29 CFR 1910.120(q). SLU will evacuate affected employees and students from the danger zone.

6.7.1 Chain of Command and Oil Emergency Action Team

With respect to an oil spill that will require an outside response effort, the Oil SPCC On-Site Coordinator will act as the Facility Emergency Coordinator (FEC) during the emergency event. The Oil Emergency Action Team shall consist of all available SLU personnel listed on Table 5-1. The role of the Alternate Oil SPCC On-Site Coordinator is: (1) to act as On-Site Coordinator whenever the Primary Coordinator is unavailable or unable to perform his duties, or (2) to assist the On-Site Coordinator during the emergency event. The Director of Safety and Security will assist the SPCC On-Site Coordinator as necessary.

The supervisor of the outside emergency response team (e.g. the Fire Department, State Police, St. Lawrence County Hazmat Team, or one of their designees will act as the Incident Commander (IC).

6.7.2 Facility Emergency Coordinator (FEC)

The FEC is the primary liaison between the facility and outside public and private emergency responders. The FEC will work with the outside responders and will coordinate resources and response efforts. When present during an emergency, the FEC is in charge of coordinating SLU's emergency action operations. The FEC directs the activities of SLU officials and will immediately and continually advise the administration/university communications (Lisa Cania or Macreena Doyle) of the status of an incident.

The responsibilities of the FEC/Oil SPCC On-site Coordinator during an oil emergency event are to:

- Assess the type, magnitude, and extent of the spill;
- Contact the facility responders to bring spill containment equipment to the spill location;
- Supervise facility responders during spill cleanup;
- Serve as the designated person responsible for oil spill prevention;
- Contact and coordinate, with local off-site first responders (i.e., fire, police, cleanup contractors listed in Table 5-1), if necessary;
- Provide emergency medical care or arrange transportation via ambulance for off-scene medical services, if necessary;
- Report any spill of a reportable quantity to the New York Department of Environmental Conservation (DEC) (800-457-7362 or 518-457-9949) and the National Response Center (1-800-424-8802);
- Coordinate, organize and/or conduct annual emergency spill response training for facility responders; and
- Maintain the first-aid stations, fire extinguishers, and spill containment equipment.

6.7.3 Incident Commander (IC)

The IC is in charge of directing emergency response operations at SLU during an emergency event. During most emergency incidents, the IC role will usually be assumed by the person in-charge of the external response team (e.g. the Fire Department, State Police, St. Lawrence County Hazmat Team, or one of their designees. Depending on the situation and which outside agencies have responded, IC responsibilities may shift.

6.7.4 Command Center

During an oil spill event that will require an outside response effort, the FEC/Oil SPPC On-Site Coordinator will establish a Command Center in the Campus Safety and Security Office, or other suitable location. Whenever notified of an emergency, all members of the team will go to the Command Center. The Campus Safety dispatcher will be notified that the Command Center has been set-up and to direct all emergency related questions there. The FEC will coordinate response efforts from either the Command Center or the actual site of the emergency incident.

6.7.5 Cleanup and Emergency Response Contractors

Private companies may be contacted to supply expertise or materials as needed in the event of an oil-related emergency. SLU will contact Op-Tech Environmental Services, Inc. to provide hazardous material emergency response services when needed (1-800-225-6750). Op-Tech provides response services 24 hours a day, 365 days a year, and has the capabilities and equipment to handle any release of oil from SLU.

It is estimated that the following equipment and materials would be sufficient to handle any oil release at SLU: two vacuum trucks, one backhoe, one dump truck or trailer, dozens of drums, and dozens of bales of absorbent pads and boom. Op-Tech has all the required equipment and materials, either at its primary

responding office in Plattsburgh, New York or its several other locations throughout New York State. See Appendix B for the SLU agreement with Op-Tech to provide emergency response services, as well as an Op-Tech Facility Profile, and the spill equipment list.

6.7.6 Agreements with Outside Responders

SLU has entered into formal and informal mutual aid agreements with the following entities to provide emergency assistance on an as-needed basis:

1) Canton Fire Department; 2) Canton Police Department; and 3) Op-Tech Environmental Services

See Agreements in Appendix B. **Table 5-1** provides a list of phone numbers for outside emergency response agencies.

Canton Fire Department

The Canton Fire Department is familiar with the layout of the SLU Campus, properties of the hazardous material used by SLU, and the specific locations of all bulk oil storage tanks and containers. The fire department is also familiar with all entrances and exits from the university, and designated evacuation routes. Moreover, the Canton Fire Department has been given an inventory of hazardous materials including petroleum products (updated annually) handled at SLU, and information describing the location and hazardous characteristics of these hazardous materials.

If off-site emergency assistance is needed in the event of an oil spill, the first outside response agency called will more than likely be the Canton Fire Department. The FEC will inform the Fire Department of all information known about the emergency incident.

When the Fire Department arrives at SLU it will:

1. Assume IC responsibilities;
2. Be aware of and observe proper safety precautions for any hazardous chemical(s) involved;
3. Determine if outside evacuation is necessary and, if so, order the evacuation;
4. Take actions necessary to counter the effects of the accident or incident;
5. Establish a forward command post at the scene, when necessary; and
6. Call additional local and state emergency responders, when necessary.

Canton Police Department

The Canton Police Department works in cooperation with the Fire Department, SLU Safety and Security, and would provide the following services when asked to do so:

1. Access control;
2. Crowd control;
3. Removal of security threats;
4. Public evacuation assistance; and
5. Traffic control.

OP-Tech Environmental Services

As described above, OP-Tech is familiar with the SLU campus, and has agreed to provide emergency response services to SLU in the event that an oil spill on campus requires remediation.

6.8 EMERGENCY OPERATIONS CENTER

Communication during an emergency, such as a large oil release, would be coordinated through an emergency operations center which would most likely be set up in the EHS Department offices. This room has direct access to all SLU telephone lines, cell phone lines, and hand-held radio communications. It will be through this operations center that emergency assistance is summoned and coordinated, and any appropriate notifications made. Additional support services may be set up in the Campus Security Office or the Facilities Operations Center as needed. The Oil SPCC Coordinator will be the primary liaison with emergency response agencies.

See 40 C.F.R. § 109.5(d)(3).

6.9 DISPOSAL PROCEDURES

The recovery of spilled oil and the removal of contaminated debris is facilitated by an incident follow-up investigation team comprised of the Oil SPCC Coordinator and other employees involved with the incident. The Oil SPCC Coordinator will determine what, if any, outside assistance is needed, identify applicable federal, state, and local regulatory requirements, and then select one or more of the following waste cleanup/management options:

Product Recovery - Whenever feasible, spilled and contained oil will be returned to their original containers (or an appropriate new container if the old one was damaged) or process of origin. The Oil SPCC Coordinator will ensure all leaks and punctures are repaired first.

Off-Site Disposal – Recovered spill residue that cannot be reused will be collected, containerized, transported, and disposed at an appropriately licensed off-site facility.

Selected cleanup and disposal options will comply with all applicable federal, state, and local laws and rules. Decontamination wastes such as gloves, protective clothing and absorbent material will be classified as hazardous or non-hazardous waste and appropriately managed.

6.10 WATER USE PROTECTION PRIORITIES

The Oil Spill Contingency Plan requirements direct facility owners to specify an order of priority in which various water uses will be protected. As described in Section 2.3, it is extremely unlikely that any critical water use areas could be impacted from an oil release at SLU. The only water bodies with a reasonable chance of being affected are the Little River and the Grass River. In the event of a release, every effort will be made to prevent oil from reaching these water bodies including diking with absorbent materials and covering stormwater catch basins that may discharge to grade in the vicinities of the surface waters. See 40 C.F.R. § 109.5(d)(5).

7. SUBSTANTIAL HARM CRITERIA EVALUATION

In accordance with 40 C.F.R. Part 112.20, SLU is required to determine whether the facility is subject to the Facility Response Plan (FRP) requirements and associated appendices if it is a high-risk facility that poses a threat of substantial harm to the environment. As outlined in 40 CRF Part 112.20(f)(1), a facility has the potential to cause substantial harm if:

- The facility transfers oil over water to or from vessels and has a total oil storage capacity, including both ASTs and USTs, greater than or equal to 42,000 gallons; or
- The facility's total oil storage capacity, including both ASTs and USTs, is greater than or equal to one million gallons, and one of the following is true:
    - The facility lacks secondary containment able to contain the capacity of the largest AST within each storage area plus freeboard to allow for precipitation;
    - The facility is located at a distance such that a discharge from the facility could cause injury to an environmentally sensitive area;
    - The facility is located at a distance such that a discharge from the facility would shut down a public drinking water intake; or
    - The facility has had a reportable spill greater than or equal to 10,000 gallons within the last five years.

SLU does not meet the substantial harm criteria in accordance with 40 C.F.R. Part 112.20, and therefore does not have to prepare and submit a Facility Response Plan to the EPA. A certification of the Applicability of the Substantial Harm Criteria Checklist is included in Appendix D.

APPENDIX A: OIL TANK INSPECTION SHEETS

Monthly Visual Inspection Form for Aboveground Oil Tanks – Form A-1

St. Lawrence University EHS Department, 23 Romoda Drive, Canton, NY 13617
Facility Registration #: 6-123706

Month: _____ Year: _____ Y=Satisfactory, N=Repair or Adjustment Needed; NA=Not Applicable

Check for the presence and acceptable condition of all the following applicable parameters and note any comments or deficiencies on the reverse.

THOROUGHLY CHECK THE FOLLOWING ITEMS:	SATISFACTORY? (YES/NO) [N – See Comments]									
Tank Number:	3	4	5	6	7	8	9	10	11	12
TANKS										
✓ Drip marks										
✓ Discoloration of tank/container										
✓ Evidence of leaked stored material										
✓ Corrosion, thinning, or cracks										
✓ Damaged or thinning of paint or coating										
✓ Damaged or worn bolts										
✓ Excessive settlement of structures										
✓ Separation or swelling of tank insulation										
✓ Structural and foundation weaknesses										
✓ Check for water in tank										
TANK PIPING										
✓ Locked drain valve										
✓ Evidence of leaked stored material										
✓ Discoloration										
✓ Vent pipe blockage with ice, snow, or debris										
✓ Corrosion, thinning, or cracks										
✓ Bowing of pipe between supports										
✓ Damaged bolts or gaskets										
✓ Signs leakage on valves or seals										
SECONDARY CONTAINMENT										
✓ Cracks										
✓ Discoloration										
✓ Evidence of leaked stored material										
✓ Corrosion or thinning of containment shell										
✓ Closed/locked drain valve										
✓ Oily residue or water in containment										
✓ Structural and foundation weaknesses										
TANK EQUIPMENT										
✓ Leak detection system										
✓ Tank level gauge										
✓ Cathodic protection monitoring equipment										
✓ Other tank equipment										

THOROUGHLY CHECK THE FOLLOWING ITEMS:	SATISFACTORY? (YES/NO) [N – See Comments]									
Tank Number:	3	4	5	6	7	8	9	10	11	12
TANKS										
✓ Primary Vent/Emergency Vent										
TANK/FILL PORT MARKING										
✓ Tank Label ID#, working & design capacities										
✓ Fill port color coded and symbol marked										

Work Orders to correct deficiencies must be submitted by the inspector to FacOps within 24 hours of completed report.

NOTABLE COMMENTS, FINDINGS, EQUIPMENT DEFICIENCIES TO REPORT	
TANK #	ISSUE(S)

TANK NUMBER KEY			
3 (022)	Central Heating Plant 1,000 gallon AST	**8**	Golf Course Pump House AST
4 (017)	Facilities Operations 1,000 diesel AST	**9**	Grasse River Pump House AST
5 (018)	Facilities Operations 500 gasoline AST	**10**	Madill emergency generator AST
6	Golf Course gasoline AST	**11**	Brown Hall emergency generator AST
7	Golf Course diesel AST	**12**	Student Center emergency generator AST

Spills must be reported to the NYS DEC unless they meet all of the following criteria:

- The spill is known to be less than 5 gallons; and
- The spill is contained and under the control of the spiller; and
- The spill has not and will not reach the State's water or any land; and
- The spill is cleaned up within 2 hours of discovery.

In the event any of these criteria are not met, immediately contact [Dan Seaman, Director of Facilities Operations, (315) 229-5632, cell (315) 244-8345] so the spill can be reported to the NYS DEC at 1-800-457-7362. If Dan is not available, call Security and Safety at (315) 229-5555.

Inspector Signature: _____

Date: _____

This inspection has been performed in a manner consistent with 6 NYCRR § 613.6.

Monthly UST Inspection Log - Form A-2

St. Lawrence University EHS Department
23 Romoda Drive, Canton, NY 13617

Month:_____ Year_____

Central Heating Plant 20,000 Gallon UST—Tank # 1

1. Date of Inspection					
2. Is The Tank Gauge Operating Properly?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
3. Volume of Oil Stored in Tank (gallons)					
4. Volume Consumed Since Last Inspection (gallons)					
5. Volume Delivered Since Last Inspection (gallons)					
6. Calculated Inventory (gallons)[2]					
7. Is There An Unexplained Variation?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
8. Is Water Present In The Tank?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
9. Is Fill Port Color Coded With API Symbol (Hexagon)?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
10. Notes					
11. Inspector's Name					
12. Inspector's Signature					

(1) In the event any equipment is not functioning properly or is improperly labeled, or if there is any indication of tank failure or malfunction, immediately notify ___ _____, or ___ _____ as alternative.

(2) The Predicted Inventory is calculated by taking the Volume of Oil Stored in the Tank (Item 3) for the previous week, subtracting the Volume Consumed Since Last Inspection (Item 4) and adding the Volume Delivered Since Last Inspection (Item 5). As a general rule of thumb, a variation of up fifteen (15) gallons may be due to measurement errors or expansion or contraction of the stored oil. If there is a greater variation, or if there are two or more consecutive weeks with unexplained losses, this may be caused by tank failure and should be reported.

Monthly UST Inspection Log - Form A-2

St. Lawrence University EHS Department
23 Romoda Drive, Canton, NY 13617

Month:_____ Year_____

Central Heating Plant 20,000 Gallon UST—Tank # 2

1. Date of Inspection					
2. Is The Tank Gauge Operating Properly?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
3. Volume of Oil Stored in Tank (gallons)					
4. Volume Consumed Since Last Inspection (gallons)					
5. Volume Delivered Since Last Inspection (gallons)					
6. Calculated Inventory (gallons)[2]					
7. Is There An Unexplained Variation?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
8. Is Water Present In The Tank?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
9. Is Fill Port Color Coded With API Symbol (Hexagon)?[1]	Y / N	Y / N	Y / N	Y / N	Y / N
10. Notes					
11. Inspector's Name					
12. Inspector's Signature					

(1) In the event any equipment is not functioning properly or is improperly labeled, or if there is any indication of tank failure or malfunction, immediately notify ___ _____, or ___ _____ as alternative.

(2) The Predicted Inventory is calculated by taking the Volume of Oil Stored in the Tank (Item 3) for the previous week, subtracting the Volume Consumed Since Last Inspection (Item 4) and adding the Volume Delivered Since Last Inspection (Item 5). As a general rule of thumb, a variation of up fifteen (15) gallons may be due to measurement errors or expansion or contraction of the stored oil. If there is a greater variation, or if there are two or more consecutive weeks with unexplained losses, this may be caused by tank failure and should be reported.

Monthly Visual Inspection Form for Oil-Containing Drums and Containers – Form A-3

St. Lawrence University EHS Department, 23 Romoda Drive, Canton, NY 13617
Facility Registration #: 6-123706

Month: _____ Year: _____

Drums and Containers								
LOCATION	TYPICAL CONTENTS	SPILL KIT PRESENT? (Y/N)	CONTENTS CLEARLY MARKED? (Y/N)	EVIDENCE OF DETERIORATION, RUST, OR LEAKAGE? (Y/N)	EVIDENCE OF SPILLS, DEBRIS OR FIRE HAZARD IN CONTAINMENT? (Y/N)	SECONDARY CONTAINMENT IN PLACE? (Y/N)	WATER IN OUTDOOR CONTAINMENT? (Y/N)	EGRESS PATHWAYS CLEAR AND GATES/DOORS OPERABLE? (Y/N)
Facilities Operation Center	Used Oil							
Facilities Operation Center	Motor Oil							
Central Heating Plant	Used Oil							
Dana Dining Hall	Waste Grease							
Dana Dining Hall In-line Waste Water System	Waste Grease							
Student Center	Waste Grease							

CORRECTIVE ACTIONS/COMMENTS: _____

_____

_____

Inspector Signature:_____ Date: _____

Report conditions that require corrective actions (significant deterioration, rusting or leakage to secondary containment) to your supervisor.
In the event evidence of an uncontrolled release to the environment is discovered, immediately contact: [Dan Seaman, Director of Facilities Operations, (315) 229-5632, cell (315) 244-8345].

STI SP001 Annual Inspection Checklist – Form A-4

St. Lawrence University EHS Department
23 Romoda Drive, Canton, NY 13617

General Inspection Information:

Inspection Date:		Retain Until Date:	(36 months from inspection date for SPCC compliance)
Prior Inspection Date:		Inspector Name:	
Tanks Inspected (ID #s):			

Item		Status	Comments
1.0	**Tank Containment**		
1.1	Containment structure in satisfactory condition?	☐Yes ☐No*	
1.2	Drainage pipes/valves fit for continued service?	☐Yes ☐No* ☐N/A	
2.0	**Tank Foundation and Supports**		
2.1	Evidence of tank settlement or foundation washout?	☐Yes* ☐No	
2.2	Cracking or spalling of concrete pad or ring wall?	☐Yes* ☐No	
2.3	Tank supports in satisfactory condition?	☐Yes ☐No*	
2.4	Water able to drain away from tank?	☐Yes ☐No*	
2.5	Grounding strap secured and in good condition?	☐Yes ☐No*	
3.0	**Cathodic Protection**		
3.1	CP system functional	☐Yes ☐No* ☐N/A	
3.2	Rectifier Reading:		
4.0	**Tank External Coating**		
4.1	Evidence of paint failure?	☐Yes* ☐No	

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Item		Status		Comments
5.0	**Tank Shell/Heads**			
5.1	Noticeable shell/head distortions, buckling, denting or bulging?	☐Yes*	☐No	
5.2	Evidence of shell/head corrosion or cracking?	☐Yes*	☐No	
6.0	**Tank Manways, Piping and Equipment within Secondary Containment**			
6.1	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	☐Yes	☐No*	
7.0	**Tank Roof**			
7.1	Standing water on roof?	☐Yes*	☐No	
7.2	Evidence of coating cracking, crazing, peeling, blistering?	☐Yes*	☐No	
7.3	Holes in roof?	☐Yes*	☐No	
8.0	**Venting**			
8.1	Vents free of obstructions?	☐Yes	☐No*	
8.2	Emergency vent operable? Lift as required?	☐Yes	☐No*	
9.0	**Insulated Tanks**			
9.1	Insulation missing?	☐Yes*	☐No	
9.2	Are there noticeable areas of moisture on the insulation?	☐Yes*	☐No	
9.3	Mold on insulation?	☐Yes*	☐No	
9.4	Insulation exhibiting damage?	☐Yes*	☐No	
9.5	Is the insulation sufficiently protected from water intrusion?	☐Yes	☐No*	

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Item		Status	Comments
10.0	**Level and Overfill Prevention Instrumentation of Shop-Fabricated Tanks**		
10.1	Has the tank liquid level sensing device been tested to ensure proper operation?	☐Yes ☐No*	
10.2	Does the tank liquid level sensing device operate as required?	☐Yes ☐No*	
10.3	Are overfill prevention devices in proper working condition?	☐Yes ☐No* ☐N/A	
11.0	**Electrical Equipment**		
11.1	Are tank grounding lines in good condition?	☐Yes ☐No* ☐N/A	
11.2	Is electrical wiring for control boxes/lights in good condition?	☐Yes ☐No* ☐N/A	

Additional Comments

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

STI SP001 Annual Inspection Checklist

Inspection Guidance:

- For equipment not included in this standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for Paint Failure.
- Inspect:
    1. Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling.
    2. Concrete containment structures and tank foundations/supports including examination for holes, washout, settling, paint failure, in addition to examination for corrosion and leakage.
    3. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
- Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 C.F.R. § 112.8(8)(v)).
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a certified inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC Plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

APPENDIX B: MUTUAL AID AGREEMENTS

APPENDIX C: 40 C.F.R. PART 112 OIL SPCC REGULATION

APPENDIX D: CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

CERTIFICATION OF THE APPLICABILITY
OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: ST. LAWRENCE UNIVERSITY

FACILITY ADDRESS: 23 ROMODA DRIVE CANTON, NEW YORK 13617

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or 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 aboveground oil storage tank area?
   Yes:_____ No: X

3. Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments.
   Yes:_____ No: X

4. Does the facility have a total oil storage capacity of greater than or equal to 1 million gallons and is the facility located at a distance 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 one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
   Yes:_____ No: X

CERTIFICATION

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 that the submitted information is true, accurate, and complete.

Printed Name	Signature
Title	Date

APPENDIX E: STORMWATER COLLECTION SYSTEM DRAWINGS

APPENDIX F: SECONDARY CONTAINMENT DISCHARGE REPORT

St. Lawrence University Secondary Containment Discharge Report

Tanks # 6 and 7

Each discharge of accumulated water from the secondary containment structure of Tanks # 6 & 7 must be conducted according to the procedures on the following page. Each discharge should be documented in the following table.

Date	Operator Signature	Appearance of Water/Drainage	Drain Valve Locked Upon Completion?

Secondary Containment Stormwater Discharge Procedure

1) Inspect the accumulated water to determine whether there is an oil sheen.

2) If there is a sheen, the oil sheen must be removed from the water using absorbent material or a contractor must be called to pump out and properly dispose of the accumulated oil/water mixture. (Contact the Oil SPCC Coordinator or Alternate for direction.)

3) If a release occurred in the secondary containment then a representative sample of the first discharge following any cleaned up spill or leak that occurs in the secondary containment will be collected and analyzed for pH and the presence of the substance(s) stored within the containment area and any other pollutants that could be present If any pollutants are present, the stormwater must be properly disposed of, or contact the NYS DEC Regional Water Manager to determine if it may be discharged without treatment.

4) If there is no oil sheen, the drain valve may be opened to release the accumulated water.

5) Once the containment is drained, the drain valve must be tightly closed.

6) The containment discharge should be documented in the Secondary Containment Discharge Report in Appendix F.

7) Report any irregularities to the Oil SPCC Coordinator or Alternate.

The tank's secondary containment drain valve should be kept closed at all times and locked, except when a monitored discharge is taking place according to the above procedure.

Oil SPCC Coordinator – Suna Stone McMasters, 229-5155

Alternate Oil SPCC Coordinator – Ted Coviello, 229-5913

Alternate Oil SPCC Coordinator – Rick Scott, 229-5611

Alternate Oil SPCC Coordinator – Jim Kozsan, 229-5625

Alternate Oil SPCC Coordinator – Marcus Sherburne – 229-5610

APPENDIX G: TANK TIGHTNESS TESTS

APPENDIX H: ADDENDUM FOR CONSTRUCTION PROJECTS

ADDENDUM FOR CONSTRUCTION PROJECTS

This addendum must be completed for any construction project that at any time will bring petroleum products in volumes in excess of 55 gallons onto St. Lawrence University (SLU) property. This addendum to the SLU SPCC plan must be completed and all provisions implemented before any contractor stores any petroleum product at the project site for one day or more.

This addendum must be provided to the Director of Facility Operations for filing with the SLU SPCC Plan. Required monthly inspections will be conducted by the Facility Operations Department. The Contractor will allow inspection of the Contractor equipment by SLU facility personnel at any time. Any deficiency identified will be corrected by the Contractor.

Construction Project:_____

On site contact person:_____

Project start date:_____

Project completion date:_____

Estimated dates oil/petroleum products meeting the above criteria will be on site:_____

Project oil storage areas:

Product	Quantity (gallons)	Storage Container Description	Storage Location

Description of secondary containment that will be provided: *(Note: for bulk storage containers, containment must have the capacity to hold 110% of the single largest container)*

Loading/Unloading Containment: *(Describe method of loading/unloading/filling product and any precautions that will be taken to prevent spillage)*

Emergency procedures: In case of accidental spills, contact the Primary Oil SPCC Coordinator (Campus phone number 229-5105) and follow the emergency procedures outlined in section 5 of the SLU SPCC Plan (attached). *ALL spills of petroleum products in any amount must be reported.*

Inspection of petroleum oil storage and handling areas: An inspection shall be completed upon placement of any container placed on the SLU site that will be used for storage of oil by the contractor. Monthly inspection shall also be completed by the Contractor until the container is removed from the SLU site. This is in addition to inspections conducted by SLU facility personnel.

Inspection shall include:

- Visual inspection of the container's exterior surface checking for leaks, corrosion, distortion or other signs of potential failure
- Visual inspection of the secondary containment system for cracks, evidence of leakage and other signs of failure
- Visual inspection of any pipes, valves and other equipment for leaks and maintenance deficiencies
- Visual inspection of safety interlocks, automatic shutoffs, level gauges and level alarms

Security: Any oil storage container shall be maintained in a secure place to prevent access by unauthorized personnel.

Training: The contractor is responsible for the training of their personnel on the proper handling of oil and petroleum products and compliance with this addendum.

Contractor Certification:

I hereby certify that I have examined this construction project and that the information contained in this addendum is complete and accurate. I agree to correct any deficiencies noted by the SLU facility personnel and to comply with all aspects of this addendum.

_____
Contractor Name & Title

_____
Date

SPCC Addendum
Rev 3 12/09