

Spill Prevention, Control, and Countermeasure Plan

November 2, 2015

1. INTRODUCTION

1.1. Purpose

Indiana University Environmental Health and Safety (IUEHS) has developed the Spill Prevention, Control, and Countermeasure (SPCC) Plan to establish procedures and guidelines to prevent oil discharges. This Plan specifically establishes proper procedures and equipment needed to address any potential discharges of oils that could violate applicable water quality standards, cause a sheen upon or discoloration of the surface of navigable waters or adjoining shorelines, or cause sludge and emulsion to be deposited beneath the surface of any water body or upon any adjoining shorelines.

1.2. Scope

This Plan applies to all Indiana University campuses that store oils aboveground in a capacity of 1,320 gallons or greater.

2. AUTHORITY AND RESPONSIBILITY

2.1. University Environmental Health and Safety (IUEHS) is responsible for:

- 2.1.1. Developing and implementing the SPCC Plan and associated training;
- 2.1.2. Providing training and technical guidance on SPCC requirements and procedures to all affected employees;
- 2.1.3. Ensuring regulatory compliance and acting as the University liaison for regulatory agencies that oversee SPCC related activities and/or conduct on-site inspections;
- 2.1.4. Notifying the appropriate regulatory agency in the event of a spill;
- 2.1.5. Responding to and assisting with spill incidents; and
- 2.1.6. Making amendments to the Plan when necessary.

2.2. Departments are responsible for:

- 2.2.1. Enforcing the SPCC Plan provisions among department employees;
- 2.2.2. Providing all necessary funding to comply with the SPCC Plan;
- 2.2.3. Ensuring that initial and annual training requirements are met;
- 2.2.4. Funding regulatory fines levied by the State or Federal agencies that result from non-compliance by individuals within a Department;
- 2.2.5. Identifying a discharge prevention designee (Appendix N) for the department and communicating his/her name to IUEHS for the respective campus;
- 2.2.6. Providing and documenting training for department employees and making records available to IUEHS annually, or upon request;
- 2.2.7. Facilitating tank inspections by contractors or IU staff and maintaining inspection records;
- 2.2.8. Following IUEHS spill response procedures and preparing site specific response procedures that meet or exceed **these procedures**;
- 2.2.9. Providing a copy of site specific response procedures to IUESH for the respective campus or review and retention;

- 2.2.10. Maintaining an adequate inventory of spill equipment to clean-up spills in the area under the department's supervision; and
- 2.2.11. Reporting spill incidents promptly to IUEHS for the respective campus ([link to environmental policy](#)).

2.3. Employees are responsible for:

- 2.3.1 Participate in initial and annual training;
- 2.3.2. Ensure compliance standard operating procedures related to spill prevention; and
- 2.3.3. Complying with the SPCC Plan requirements of the respective campus.

3. SPCC PLAN ELEMENTS

3.1. General requirements

The Plan has been prepared pursuant to regulations set forth in the Environmental Protection Agency's Oil Pollution Prevention Regulations [40 CFR 112](#) which states that any facility having an oil storage capacity of 1,320 gallons aboveground or greater, and could reasonably be expected to discharge oil in harmful quantities into navigable waters of the United States must prepare and implement an SPCC Plan. This document provides the general provision of the Indiana University SPCC Plan. Appendices with campus-specific information are available through IUEHS for the respective campus.

3.1.1 Plan Distribution

In order to promote campus awareness and to facilitate regular review, copies of the complete SPCC plan will be accessible at facilities/departments involved in the implementation of the Plan.

3.1.2 Certification of Substantial Harm Determination

As required under 40 CFR 112, a completed Certification of Substantial Harm Determination Form which demonstrates that Indiana University does not meet the criteria for posing a risk of substantial harm to the environment is included as Appendix J. Given the amounts and types of oil stored on the IU campuses, the potential to cause substantial harm to the surrounding community does not exist.

3.1.3 Professional Engineer's Certification & IUEHS Management Signature

Contact IUEHS for your respective campus for a copy of the certification.

3.1.4 Facility and Emergency Contact List

A list of emergency contacts is maintained by Indiana University Police (IUPD) dispatch for each respective campus. IUPD will contact the appropriate IUEHS personnel for the respective campus in the event of a spill.

3.1.5 General Site Information

The Plan must contain a Campus Description, Oil Storage Overview, Drainage Pathway and Distance to Navigable Waters for each campus. This can be found in Appendix B. Facility diagrams are available for review by contacting IUEHS for your respective campus.

3.1.6 Potential Spills and Containment Measures

IUEHS has generated a list of sources that have the potential for spills. These can be found in the Appendices: D Oil Transformer List, E Emergency Generator List, F Tank List, G Hydraulic Elevator List, H 55 Gallon List, & I Cooking Oil Storage List.

3.1.7 Spill Response and Emergency Procedures

The goal of these emergency procedures is to eliminate the potential for oil spills to reach the waters of the State. Refer to the spill section of the [Environmental Policy](#) for more information about spill response and reporting of spills.

3.1.8 Routine Containment Drainage

Exposed containment measures, such as dikes, can collect rainwater and are routinely drained. IU staff are responsible for inspecting collected water in containment for oil sheens. If no sheen is present, rainwater is drained into sanitary sewers and storm drains. If a sheen is found, clean-up measures such as booms and absorbents are used to remove free product and are then disposed of properly usually as solid waste. Records of an oil sheen clean-up are recorded and additional tank inspections are made.

3.1.9 Oil Filling / Withdrawal / Overfill Protection

All tanks shall have high level alarms, shut offs, or (at a minimum) gauges to be monitored during filling. Regardless, the following general procedures will be followed while filling Aboveground Storage Tanks and Emergency Generator tanks:

1. No smoking is allowed while unloading combustible or flammable materials.
2. Truck engines and emergency generators will be turned off during the unloading process unless used to operate a fuel pump and fuel truck shall be grounded or bonded while unloading fuel.
3. The driver will remain with the vehicle at all times during unloading.
4. The entire unloading event will be monitored by truck drivers and IU employees to ensure maximum safety. Both parties will have unobstructed views of the truck and tank throughout the unloading process. If refueling must take place from a remote location, one party will inspect the tank while the other party unloads. The parties may also use radio communication systems during the refueling process.

5. Unloading will be performed only in areas designated for this purpose.
6. Unloading shall not begin until tank instruments and/or a visual inspection of fill ports indicate enough volume is available to accept a transfer.
7. Upon the completion of a transfer, all truck valves will be closed and the unloading hose drained back to the storage tank before disconnection by the driver.
8. Procedures for addressing spills shall be followed by all IU employees. Any spills or leaks not contained with local equipment will be immediately reported to IUEHS or University Police for the respective campus.

Note: Department-specific and vendor load out procedures will be kept up to date at IUEHS for the respective campus.

3.1.10 Inspections and Records

Monthly inspections shall be made of the storage tanks in accordance with the Steel Tank Association's Standard SP001-00 included as Appendix K.

Tank inspections shall consist of the following:

- a visual check for signs of leakage and deterioration of the tank, containment area, and associated piping; and
- an annual inspection of the fuel gauge. The fuel gauge on each tank shall be removed and checked for an accurate fuel level reading per user's manual.

Inspections of the emergency generators shall be performed by Facilities Services/Physical Plant for the respective campus or by a contractor.

Hydraulic elevators shall be inspected monthly by Facilities Services/Physical Plant for the respective campus or a contractor. Leaks from elevators shall be quickly addressed due to equipment failure.

Two forms are included in the Plan for use by IU employees: Appendix L Tank Inspection Form and Appendix M Emergency Generator Inspection Form.

3.1.11 - Security

Indiana University maintains its own Police Department and regular security patrols are made throughout the campuses in an effort to protect vital resources. The campuses are sufficiently lit to allow for the discovery of any spills during evening hours and to discourage vandalism. The Police Department has the emergency contact list so that any spills after office hours can be addressed promptly.

3.1.12 – Waste Disposal

Once spills have been contained, absorbed or segregated from a vulnerable area, they must be disposed of properly as determined by IUEHS. A disposal determination shall be made by IUEHS. Any free product in a liquid state shall be containerized in waste cans or 55-gallon drums. Arrangements shall then be made with a hazardous waste contractor for proper pickup and disposal. Any solid materials associated with an oil or fuel spill (except gasoline) such as absorbent pads, pigs, and clay chips are generally not considered hazardous and can be disposed of in typical solid waste receptacles.

3.1.13 – Internal Auditing

Internal auditing of all requirements in this Plan shall be conducted by IUEHS for the respective campus at least every five years to ensure IU is in compliance with the SPCC Plan. Findings from these audits will then be used to improve the Plan and increase the campus' ability to eliminate the potential for spills to reach surrounding water bodies.

4. TRAINING AND RECORDKEEPING

Training

All new employees who work with oil must receive training from IUEHS within 30 days of hire or when they have an assignment that requires working with oil.

Initial Training

IU employees covered by this Plan must be trained in the safe operation and maintenance of oil-related equipment to eliminate the potential for spills. The initial training includes familiarization with Safety Data Sheets, spill response procedures, inspection methods, oil filling and withdrawal procedures, routine rain water drainage from dikes, and other requirements of this Plan.

Annual Training

A discharge prevention briefings shall be performed and documented annually by the discharge prevention designee (DPD) assigned by each department. These records shall be submitted to IUEHS for the respective campus annually for review. See Appendix O for Discharge Prevention Briefing form.

Recordkeeping

Records of inspections shall be documented and kept on file for at least 3 years along with any manufacturing information and general tank specifications. Records of training sessions shall be maintained by the department for five years.

5. REFERENCES

[40 CFR Part 112](#)

6. REVISIONS

New Document: November 2, 2015

GLOSSARY AND ABBREVIATIONS

AST	Aboveground Storage Tank
CFR	Code of Federal Regulations
CWP	Chilled Water Plant
DPD	Discharge Prevention Designee
EHS	Environmental Health & Safety (Local)
HAZWOPER	Hazardous Waste Operations
IUEHS	Indiana University Environmental Health and Safety
OSHA	Occupational Safety & Health Administration
PCB	Polychlorinated Biphenyl
PPE	Personal Protective Equipment
Primary Containment	Tank Wall
Secondary Containment	Tank Wall with 2 nd wall or dike
Tertiary Containment	Tank Wall with 2 nd wall and dike
Sight Glass	Tank Level Gauge
SPCC	Spill Prevention, Control, and Countermeasure
USEPA	United States Environmental Protection Agency

Oil: oil is defined in 40 CFR 112.2(a) as: “oil means 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, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.”

Discharge Prevention Designee: a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.