# Spill Prevention, Control and Countermeasure Plan



# Texas A&M University – Central Texas Office of Safety & Risk Management



Level 2

**Countermeasure Plan** 

# May 8, 2019

# Texas A&M University-Central Texas Spill Prevention, Control & Countermeasure Plan

# **Concurrence and Approval**

Original Signed and on file in the Office of Safety & Risk Management	
Safety and Risk Management Officer; Document Custodian	Date
Original Signed and on file in the Office of Safety & Risk Management	
Vice President for Finance and Administration	Date
Original Signed and on file in the Office of Safety & Risk Management	
President	Date
Original Signed and on file in the Office of Safety & Risk Management Vice President for Finance and Administration Original Signed and on file in the Office of Safety & Risk Management President	Date

# **Certification (if required by law or regulation)**

None of the elements of this SPCC Plan involve impracticability or alternate methods that would require review and certification by a professional engineer. If at any time in the future alternate methods requiring PE approval are added to this Plan, this space is reserved for PE certification and stamp.

Should future facility alterations (e.g., aggregate oil storage capacity exceeding 10,000 gallons) occur such that the facility is no longer Tier I qualified, a new SPCC Plan will be prepared and certified by a PE.

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#### **Change History**

Every five years or whenever substantive changes to the facility or plan occur; this document will be reviewed and amended as necessary. Procedures for change management and Plan revision are discussed in Section I. Self-Certification Statement. Major revisions are indicated by sequential three digit numbers under the "Revision Number" column. Minor changes or technical amendments to the plan (e.g., contact information; addition of new equipment of the same type as already existing) may occur at any time and are indicated by a sequential number under the "Interim Change Number" column. The right column provides a brief summary of changes. Detailed logs of all 5-year reviews, major revisions and minor or technical amendments are maintained in Attachment 1 of this SPCC Plan.

Revision	Interim	Effective Date	
Number	Change No.		Description of Change
000	0	07/20/15	Initial plan
001	1	05/08/19	Update, added new building and equipment



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#### Section 1. Tier I Qualified Facility SPCC Plan – Introduction

This document with its attachments constitutes the Spill Prevention, Control and Countermeasure Plan (SPCC Plan) for Texas A&M University-Central Texas (A&M-Central Texas) when completed and signed by university administrators. A&M-Central Texas meets the Tier I applicability criteria in 40 CFR §112.3(g) as follows:

- (1) No individual aboveground oil storage container is larger than 5,000 gallons, with the largest being 500 gallons; and
- (2) There have been no Clean Water Act-reportable discharges of oil, and the aggregate aboveground oil storage capacity (1,832 gallons) is 10,000 U.S. gallons or less.

This SPCC Plan addresses the requirements of 40 CFR Part 112. A complete copy of the SPCC Plan is maintained at the facility, which is normally attended 24 hours per day. When making operational changes at the facility that are necessary to comply with the rule requirements, A&M-Central Texas will follow applicable federal and State of Texas requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

#### **Facility Description**

Facility Name	Texas A&M University	Central Texas			
Facility Address	1001 Leadership Place	9			
City	Killeen	State	ТХ	ZIP	76549
County	Bell	Tel. Number	(254) 519-5771		
Owner or Operator Name	An agency of the State	of Texas, and me	mber of The Texas	A&M Unive	rsity System
Owner or Operator Address	1001 Leadership Place	9			
City	Killeen	State	ТХ	ZIP	76549
County	Bell	Tel. Number	(254) 519-5771		

#### **Facility Diagram**

A facility diagram is included as ATTACHMENT 5 with this SPCC Plan. The diagram is a map (to scale) of the A&M-central Texas campus and includes the following features:

- Campus topography, page 39
- Campus buildings and physical features, page 40
- Locations of oil containers, keyed to container identification numbers, page 40
- Flow direction of a theoretical spill from each container to the nearest storm drain or surface water feature, page 40
  Navigable waters that could be affected by a discharge, as well as potentially affected neighboring landowners, page
- 40
  Layout of the storm water inlets and underground and aboveground piping and collection system, page 41
- Storm water outfalls, both within campus and where campus drainage would discharge to navigable waters, page 41
- Locations of prepositioned oil spill containment and response equipment and supplies
- North arrow and map scale

# Texas A&M University-Central Texas



#### Program: Environmental Management Spill Prevention, Control & ENVM-24-L2-S14-CH4-001 Doc. No.: Countermeasure Plan Rev No: 000 3/08/2019 Date: Level 2 Office: A&M-Central Texas Safety & Risk Management

#### Section 2. Self-Certification Statement (§112.6(a)(1))

A&M-Central Texas certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

#### I, \_Shawn Kelley

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

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

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

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

Signature		Title:	Safety and Risk Management Officer
Name	Shawn Kelley	Date:	

Texas A&M University-Central Texas

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#### Section 3. Record of Plan Review and Amendments

#### Five Year Review (§112.5(b))

This SPCC Plan is reviewed and evaluated at least once every five years. As a result of the review, any necessary amendments to this SPCC Plan will be incorporated within six months to include more effective prevention and control measures for the facility, if applicable. Any SPCC Plan amendment will be implemented as soon as possible, but no later than six months following SPCC Plan amendment. Completion of the review and evaluation will be documented, and the Five Year Review Log in Attachment 1.1 will be completed. If the facility no longer meets Tier I qualified facility eligibility, A&M-Central Texas will revise the Plan to meet Tier II qualified facility requirements, or complete a full PE certified SPCC Plan.

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

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#### Section 4. Plan Requirements

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

Table G-2 Oil Storage Containers and Capacities					
This table includes a complete list of all oil storage containers (aboveground containers <sup>a</sup> and completely buried tanks [ <i>Note: There are no buried tanks</i> ] <sup>b</sup> ) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers [ <i>Note: There are no mobile/portable containers</i> ], an estimated number of containers, types of oil, and anticipated capacities are provided.					
Oil Storage Container		Type of Oil	Shell Ca	pacity	
	(		(yalio	115/	
EMG-01: Back-up generator Bldg. #1 Fuel Tank	( <b>A</b> )	Diesel Fuel	500		
EMG-02: Back-up generator Bldg. #2 Fuel Tank	( <b>A</b> )	Diesel Fuel	472	2	
EMG-03: Back-up generator Bldg. #3 Fuel Tank	(A)	Diesel Fuel	619	)	
TR-01: Electrical Transformer Bldg. #1	( <b>A</b> )	Biotemp Natural Ester Fluid	485	;	
TR-02: Electrical Transformer A Bldg. #2	( <b>A</b> )	FR3 Envirotemp Natural Ester Fluid	323		
TR-03: Electrical Transformer B Bldg. #2	( <b>A</b> )	FR3 Envirotemp Natural Ester Fluid	396	;	
TR-03: Electrical Transformer Bldg. #3	(A)	FR3 Envirotemp Natural Ester Fluid	437		

# See Attachment 5 for a more detailed description of the containers listed in Table G-2.

Total Aboveground Storage Capacity (gallons) <sup>c</sup>	2,176
Total Completely Buried Storage Capacity (gallons)	0
Facility Total Oil Storage Capacity (gallons)	2,176

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

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

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

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

#### Table G-3 Secondary Containment and Oil Spill Control

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

#### Bulk Storage Containers Description

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Emergency generators on the A&M-Central Texas campus are fueled by diesel stored in "belly" tanks in the bases of the generator sets. Fuel tanks of non-motive equipment are considered bulk storage containers and have sized secondary containment requirements under §112.8(c)(2). Secondary containment is accomplished by double-walled tanks, with the inner, primary tank surrounded by an outer secondary containment tank, leaving an interstitial space between the two for leak detection and containment.

- Generator sets for Founder's Hall and Warrior Hall are manufactured by Kohler Power Systems, powered by John Deere diesel engines conforming to EPA interim Tier 3 non-road emissions regulations. The above-ground rectangular secondary containment tanks mount directly to the generator sets, below the generator set skids (subbase).
- Generator set for Beck Family Heritage Hall is manufactured by Cummins Power Generation and conforms to EPA interim Tier 3 non-road emissions regulations. The above-ground rectangular secondary containment tank in mounted directly to the generator set, below the generator set skids (subbase).
- The secondary-containment generator-set base tanks for Founder's and Warrior Hall are manufactured by Wedlake Fabricating, Inc. and are UL 2085 listed. They are constructed of 7 gauge steel and painted with two coats each of rust inhibitive primer and black enamel.
- The secondary-containment generator-set base tank for Beck Family Heritage Hall is manufactured by Henning Enclosure Systems and is UL 142 certified. The primary tank is constructed of 7 gauge steel. The secondary tank is constructed of 11 gauge steel with 7 gauge channels and holds 121% of the primary tank.
- To ensure cold-weather operations, fuel tanks are equipped with thermostat-controlled tank heaters.
- Both the inner and outer tanks have emergency relief vents.
- Flexible fuel lines are provided with subbase fuel tank selection.
- The inner (primary) tanks are sealed inside the outer (secondary) tanks. The outer tanks contain the fuel if the inner tanks leak or rupture and are equipped basin-leak alarms.
- Inner tanks are equipped with low-fuel and high-fuel alarm float switches.
- Inner tanks have overfill prevention valves and 5-gallon spill boxes.

#### Emergency Generator Tank Release Discovery and Reporting

As described below in Section III.3. 3. Inspections, Testing, Recordkeeping and Personnel Training, campus oil containers are frequently inspected (monthly inspections and annual maintenance).

However, should a leak occur between regular inspection dates, campus students, faculty, or staff who observe a problem may report it directly via 911 or by using the <u>Warrior Shield app</u>. The app has an anonymous report button that allows the user to report vehicle crashes, suspicious persons, drug abuse, service needed, or the ability to report active emergency hazards.

#### Fuel Transfer Procedures & Spill Response

Even though the tanks are equipped with overfill prevention, release scenarios suggest that a spill, however unlikely, may occur due to container overfill or fill line rupture. Any such spill is likely to be less than five gallons and should not threaten navigable waters. Facility staff or contractors who maintain and refuel or top-off generators must be:

- Trained in fuel transfer / spill prevention procedures (see the general Oil Transfer Procedure Checklist in Section 5 of this SPCC Plan);
- Provided with facility contact information should a spill occur or irregular condition be observed, and
- Supplied with on-board drain-covers and spill control / cleanup supplies to handle small spills.

#### **Oil-Filled Operational Equipment**

#### Description

Four pad-mounted medium-voltage 3-phase transformers supply the three campus buildings with power. These Class KNAN units are naturally cooled with high fire point (i.e., >300°C) mineral fluid. Transformers are single walled of steel

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construction with stainless steel bases, painted green with two coats of urethane finish to inhibit corrosion, and equipped with pressure vacuum gauges with alarms, oil level gauges with alarms, and drain valves with oil sampler ports. Drain valves are inside of a locked, high-security protective cabinet. At the east end of Building #1 (Founder's Hall) is an ABB 1,500 KVA unit containing 485 gallons of Biotemp Natural Ester Fluid. At the west end of Building #2 (Warrior Hall) are two Cooper Power Systems units, a 1,000 KVA with 323 gallons of FR3 Envirotemp Natural Ester Fluid and a 1,500 KVA with 396 gallons of PCB-free mineral oil. At the south end of Building #3 (Beck Family Beck Family Heritage Hall) is a Cooper Power Systems unit, a 24.9kv with 437 gallons of FR3 Envirotemp Natural Ester Fluid.

The units have single-walled tanks and do not have general secondary containment, as allowed for **Qualified Oil-filled Operational Equipment** under 40 CFR §112.7(k). The facility has had no Clean Water Act (CWA)-reportable discharges and so qualifies for paragraph (k).

Therefore, as required by paragraph (k), transformers are covered by an *Oil Spill Contingency Plan* and a *Written Commitment of Manpower, Equipment and Materials*, provided in ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist. The contingency plan would be activated in the event of a state-reportable or federal CWA-reportable discharge to navigable waters.

#### **Transformer Release Discovery and Reporting**

Transformer leaks are extremely uncommon. Failures are most frequent when transformers are new and have inherent manufacturing flaws or when they are nearing the end of their operating lives (typically 20+ years) due to deterioration. Slow, minor leaks are rare and are easily observed during frequent inspections. Major, catastrophic leaks are always manifest immediately, because a major failure also kills power to the building and often includes arcing, fire and/or explosion. For example, catastrophic failure of a 1,000 KVA transformer would likely result in a flowing stream of flaming transformer oil.

As described below in Section III.3. 3. Inspections, Testing, Recordkeeping and Personnel Training, campus transformers are frequently inspected (monthly inspections and annual maintenance). Any minor leaks would be easily detected in time to prevent a reportable discharge, since flow rates would be immeasurably low and would initially appear as oil stains or spots.

However, should a leak occur between regular inspection dates, campus faculty, staff or students who observe a problem may report it directly via 911 or, for non-emergencies, using the <u>Warrior Shield</u> smartphone app. The app lists Security, EHS and Facilities contact numbers, provides generalized Emergency Procedures for an Outdoor Chemical Spill, and includes a "REPORT HAZARD" form for non-emergency hazards.

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

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

Attachment 5 provides a more detailed description of the containers as well as an evaluation of release scenarios and expected release rates and
quantities.

Table G-4 Containers with Potential for an Oil Release or Reportable Discharge						
Area	Type of failure (discharge scenario)	Potential release volume (gallons)	Release Flow Direction	Secondary containment method <sup>a</sup>	Secondary containment capacity (gallons)	
Bulk Storage Containers and Mobile/Portabl	e Containers <sup>b</sup> )					
EMG-1: Back-up generator bldg. #1 Fuel Tank	Container rupture (strike by vehicle)	500	South	UL 2085, protected secondary containment storage tank	610	
	Container overfill	2				
EMG-2: Back-up generator bldg. #2 Fuel Tank	Container rupture (strike by vehicle)	472	Southwest	UL 2085, protected secondary containment storage tank	575	
	Container overfill	2				
EMG-3 Back-up generator bldg. #3 Fuel Tank	Container rupture (strike by vehicle)	619	Southwest	UL 142. Protected by secondary containment storage tank	694	
	Container overfill	2				
Oil-filled Operational Equipment (e.g., hydra	ulic equipment, transformers) <sup>c</sup>					
TR-1: Electrical Transformer Bldg. #1	Container rupture (internal arc)	485	South	Cement retaining wall, active	337	
	Container leakage (fin or fitting slow leak)	1	South	measures and contingency plan.		
TR-2: Electrical Transformer A, Bldg. #2	Container rupture (internal arc)	323			None	
	Container leakage (fin or fitting slow leak)	1	Southwest	Active control and countermeasures,		
TR-3: Electrical Transformer B, Bldg. #2	Container rupture (internal arc)	396	Souriwest	plan for reportable discharges.	None	
	Container leakage (fin or fitting slow leak)	1				
TR-4: Electrical Transformer Bldg. #3	Container rupture (internal arc)	437	Southwest	Active control and countermeasures,	None	
	Container leakage (fin or fitting slow leak)			plan for reportable discharges.		
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)						
EMG-1: Back-up generator bldg. #1 Fuel Tank	Fill line rupture	5	SSW	Steel box around filler	5	
EMG-2: Back-up generator bldg. #2 Fuel Tank	Fill line rupture	5	SSW	Steel box around filler	5	
EMG-3: Back-up generator bldg. #3 Fuel Tank	Fill line rupture	5	SSW	Steel box around filler	5	
Transformers	Sealed system with no transfer					

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<sup>a</sup> Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials. <sup>b</sup> For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation. <sup>c</sup> For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

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# 3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.6(a)(1)(iv), 112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4))

Table C.F. Increations, Testing, Record keeping and Personnal Training	
An increasion program is implemented for all all filled an articipal anuity and the second bulk storage	
An inspection program is implemented for all oil-filled operational equipment and aboveground bulk storage	
containers and piping at this facility [§§112.7(e) and (f)]. Additionally, a testing program is implemented for all	$\square$
aboveground bulk storage containers and piping at this facility. [§§112.8(c)(6) and (d)(4)].	
There are no oil production or natural animal or vegetable oils in regulated containers at the facility, so \$\$112.9(c)(3), 112.12(c)(6) and (d)(4)] do not apply.	
A&M-Central Texas has adopted the Steel Tank Institute standard for inspections and integrity testing (STI SP001) for	or all
aboveground bulk storage containers and oil-filled operational equipment. See Attachment 3 for the STI SP001	
categorization of the A&M-Central Texas tanks and transformers and the associated requirements	
Written tank/container inspection procedure: consists of monthly and annual visual inspection by SPCC and facili	ity
trained personnel to look for, report and assign responsibility to correct, for signs of deterioration, discharges or	
accumulations of oil inside secondary containment including tanks, piping, dispenser hoses, fittings, tank/container su	upport
and foundations, corrosion of tank/container systems and components.	••
• Ensure good housekeeping practices are maintained in and around the tank/container area so there is no	
accumulation of leaves trash or debris, ensure drain valves/fittings are fully closed and canned	
<ul> <li>Leak conditions should be promptly reported, repaired and "wet oil conditions, oil staining" cleaned up comptions</li> </ul>	otoly
<ul> <li>Leak conditions should be promptly reported, repaired and "wet on conditions, on staining" cleaned up compto Signs of correction should be repoired and re-pointed/control on personner.</li> </ul>	eleiy.
Signs of contosion should be repaired and re-painted/coaled as necessary.	
Ensure that secondary containment systems are in good condition and capable of preventing oil discharges	
outside of containment system prior to clean-up.	
<ul> <li>Inspection forms (logs) will be signed and kept on file for a minimum of three years.</li> </ul>	
Diesel fuel storage tanks	
Scope/Frequency: Monthly and annual to follow written inspection procedures	
Method: Visual inspections recorded on Monthly and Appual SPCC Inspection Forms (Attachment 3) based on STLS	D001
stenderde	
Stanuarus.	
Transformers	
Scope/Frequency: Monthly and annual to follow written inspection procedures	
Method: Visual inspections recorded on Monthly and Annual SPCC Inspection Forms (Attachment 3).	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility.	
Records of inspections and tests kent under usual and customary business practices will suffice for purposes of	$\square$
this paragraph [8112 7(a)]	
A record of the inspections and tests are kent at the facility or with the SPCC Plan for a period of three years	
[8112 7/a)] [See Inspection I ag and Schedule in Attachment 3 1]	$\boxtimes$
[3112.7(e)] [See inspection Log and Schedule in Attachment 3.1]	
Inspections and tests are signed by the appropriate supervisor of inspection. [§112.7(e)]	
Personnel, training, and discharge prevention procedures [§112.7(f)]	$\boxtimes$
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges;	
discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations;	$\boxtimes$
and, the contents of the facility SPCC Plan. [§112.7(f)]	
A person who reports to facility management is designated and accountable for discharge prevention.	
[§112.7(f)]	X
Name/Title: Shawn Kellev, Safety & Risk Management Officer	
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate	
understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges	
or failures, malfunctioning components, and/or any recently developed precautionary measures.	

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#### [See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]

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

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

Security measures are implemented at A&M-Central Texas to prevent unauthorized access to oil handling, processing, and storage areas.

The regulatory intent of security measures at a facility is to secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. The following is a description of measures deemed appropriate for A&M-Central Texas.

**Inherent security of backup generator fuel tanks.** The backup generators for building 1, 2, and 3 have UL listed protected secondary containment storage for the diesel fuel they contain. The fill caps are protected by padlock for the generator for building 1 and by key locked access door for the generator for building 2 and building 3. Generators for building 1 and 2 have cinderblock and stone walls protecting them from accidental impacts. The generator for building 3 is in a locked gated equipment yard.

**Inherent security of electrical transformers:** All transformers are sealed and locked to prevent tampering. No one on campus is qualified to open the transformers. Any required maintenance is performed by a qualified electrician using the proper PPE (Personal Protective Equipment) and lock-out/tag-out procedures. The part of a transformer most vulnerable to tampering is the drain valve/sample port. Access is via the locked high-security cabinets, but a vandal could, at great personal risk of electrocution, open a cabinet and a drain valve, releasing oil; however, if oil is drained from a live transformer, it quickly fails, causing a power outage and alerting campus security and utilities personnel. Transformers are protected from traffic impact by retaining walls or elevated pads.

**Surveillance and Lighting**: In addition to inherent security features of the generators and transformers, the campus has year-round, 24-hour police presence. Campus buildings are monitored via surveillance cameras and by regular patrols. Generators and transformers and their immediate vicinities are visible at night due to general area lighting.

<u>Notifications by the general public</u>: As stated in Section 2 of this SPCC Plan, should a leak occur between regular security rounds, anyone in the campus community (faculty, staff, students or visitors) who observe a problem may report it directly via 911 or, for non-emergencies, using the <u>Warrior Shield</u> smartphone app. The app lists Security, EHS and Facilities contact numbers, provides generalized Emergency Procedures for an Outdoor Chemical Spill, and includes a "REPORT HAZARD" form for non-emergency hazards.

#### 5. Countermeasures – Emergency Procedures and Notifications (§112.7(a)(3)(iv) & 112.7(a)(5))

Table G-7 Description of Countermeasures – Emergency Procedures and Notifications

#### Countermeasures for an Oil Release

The following is a description of the immediate <u>**Countermeasures**</u> for <u>*release*</u> discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor) to be taken by facility personnel in the event of a release from an oil container.

#### Contingency Plan Activation for a Reportable Discharge

In the event that a release exceeds state or federal reporting thresholds, or threatens or reaches navigable waters or adjoining shorelines (i.e., a Clean Water Act-reportable <u>discharge</u> [§112.7(a)(3)(iv) and 112.7(a)(5)], the facility Oil Spill Contingency Plan (<u>Described in Attachment 2 of this SPCC Plan</u>) will be activated.

 $\boxtimes$ 

# Texas A&M University-Central Texas



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### **Countermeasures Response to Non-Reportable Spills and Leaks**

<u>RECOGNIZE</u> - *Know your materials; know the hazards*. <u>Oil</u> - Visible as clear to dark colored fluids. Some flow freely while some are viscous. <u>*May be highly flammable - Keep sparks, flames and heat away!*</u> Can have a noticeable odor. Observe from a safe distance.

#### **OBSERVE AND NOTE** *quickly* and from a safe place:

**Location** of the problem and its source;

Identity of the material involved;

**Extent** of the problem (Incidental or Uncontrolled, quantity spilled, oil entered storm drain?);

Threat of fire, explosion or other;

Injuries to personnel and their severity; and

**Risks** to other personnel or emergency responders.

#### <u>NOTIFY</u>

**1st**, **immediately warn nearby persons** who may be in danger or who may be trained to assist. (Do so without slowing notification of Emergency Dispatch (911). IF THERE IS DANGER TO LIFE OR HEALTH, ACTIVATE THE ALARM SYSTEM RIGHT AWAY.

#### 2nd, immediately notify the Emergency Call Center @ 911 and provide the following:

1. Your name;

2. Your observations (Location, Identity, Extent, Threat, Injuries, Risks).

The 911 Dispatcher will notify the proper authorities.

<u>3rd</u>, <u>immediately call</u> campus emergency coordinator (<u>see list of emergency contacts</u>). If the leak is from an electric transformer, call Facility Maintenance. <u>BE PREPARED TO ACT</u> (e.g., keep others away; control spill/fire) if you are trained and can do so safely.

**<u>4th</u>**, <u>remain on-scene at a safe distance</u> to meet responders, guide them to the incident location and provide them with firsthand observations.

#### ACT (ONLY WHEN SAFE TO DO SO)

- → DO NOT ATTEMPT TO CLEAN UP LARGE SPILLS
- → NO SMOKING! KEEP FLAMES & IGNITION SOURCES AT LEAST 50 FT AWAY!
- → IF POSSIBLE, shut off the source of the leak or spill.
- → QUICKLY! Open the OIL SPILL drum (if available), put on personal protective equipment ([PPE] gloves; Tyvek coveralls; boot covers).
- → Place storm drain plug over the storm water inlet to block oil from entering the sewer.
- ➔ If oil has already entered the storm drain, use map to locate storm sewer outlet and direct emergency HazMat team to the location.
- → Intercept oil flow above the storm water inlet using sorbent socks.
- → For small spills, use granular sorbent to absorb the oil.
- → After the leak is stopped, shovel oily sorbent into the waste bucket and close the lid.
- ➔ Place oil-soaked sorbent socks into plastic bags.
- → Remove PPE and bag it.
- → Place all contaminated materials (bucket and bags) into the OIL SPILL drum.
- → HazMat team or EHS staff will clean or arrange the cleaning of residual contamination.
- → EHS staff will arrange shipping of OIL SPILL drum and order replacement supplies.

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Storm water inlet plugs/socks (sized to fit various drain openings)	
Drums labeled "Emergency Oil Spill Supplies"	
Bulk spill control materials (store at key staging locations)	EMERGENCY
Typical Drum Contents (arranged in order, top to bottom) → Nitrile or neoprene gloves	
<ul> <li>Heavy gauge plastic bags for contaminated sorbents, socks and PPE</li> </ul>	CALL: <u>9-911</u> and Safety: <u>1-254-368-5779</u>
➔ Antistatic shovel or scoop	
➔ At least 20 petroleum absorbent pads (for oil, gas & diesel)	
➔ At least 20 universal absorbent pads (for antifreeze & most other liquids)	
<ul> <li>Several 3 inch x 4 ft absorbent socks (for oil, gas &amp; diesel)</li> </ul>	
<ul> <li>Bags of "Oil Sponge" or other granular absorbent</li> </ul>	
➔ DOT/UN-rated lab pack container for spill cleanup residues	
If leak or spill <u>exceeds</u> reporting thresholds, implement the Oil Spill Contingency Plan.	

# 6. Contact List (§112.7(a)(3)(vi))

Table G-8 Contact List		
Contact Organization / Person	Telephone Number	
National Response Center (NRC) – call <u>ONLY</u> if there is an actual or threatened federal CWA-reportable discharge	1-800-424-8802	
Texas State Emergency Response Commission (SERC) – call <u>ONLY</u> if there is a state reportable discharge to land or water	Spill Reporting Hotline: 1-800-832-8224	
Cleanup contractor(s)		
<ul> <li>Safety-Kleen Emergency Response, Waco, TX</li> </ul>	1-888-375-5336	
<ul> <li>SET Environmental (24-hr emergency no.)</li> </ul>	1-877-437-7455 (1-877-43-SPILL)	
Key A&M-Central Texas Personnel		
Designated Oil Spill Response Coordinator (RC)	Office: 254-519-5771	
Shawn Kelley, Safety & Risk Management Officer	Emergency: 254-368-5779	
Omar Villafano, Eacilitios Managor	Office: 254-501-5876	
	Emergency: 254-290-4587	
Charles Rodriguez, Police Chief/Director of Public Safety	Office: 254-501-5800	
Chanes Rounguez, 1 blice Chiel/Director of 1 ublic Safety	Emergency: 254-245-6948	
Dr. Cynthia Carter-Horn, VP Finance & Administration	Office: 254-519-5458	
	Emergency: 254-592-4210	
Other State and Local Agencies	Office: 254-501-7706	
Peter C. Perez, Killeen Emergency Management Coordinator	Office. 234-301-7700	
Local Fire Departments		
<ul> <li>Killeen Fire Department (5400 Bunny Trail, Killeen)</li> </ul>	911 or 254-501-6602	
<ul> <li>Fort Hood Fire Department</li> </ul>	911 or 254-287-3908	

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Table G-8 Contact List		
Contact Organization / Person	Telephone Number	
Local Police Departments		
Killeen Police Department	911 or 254-200-7903	
Hospitals		
Advent Health Hospital	254-526-7523	
Seton Medical Center	254-690-0900	
Darnall Army Medical Center	254-288-8000	
Other Contact References (e.g., downstream water intakes or		
neighboring facilities)		
<ul> <li>Dr. Peg Gray-Vickrey, Provost &amp; VP Acad. &amp; Student Affairs</li> </ul>	Office: 254-519-5447	
<ul> <li>Bell County Emergency Management</li> </ul>	Office: 254-933-5587	
Bell County Sheriff's Office	Office: 254-933-5400	

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

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines [See Discharge Notification Form in Attachment 4]: [§112.7(a)(4)]	$\boxtimes$

# Regulatory-Required Notification (immediately after the initial emergency response)

#### Is it a reportable spill that requires governmental notification?

		Reportable Quan	tity (RQ)
Regulatory Authority	Type of Oil	Onto Land (outside of secondary containment)	Into Water
	Crude Oil, Lube Oil, Hydraulic Fluid, <u>Transformer Oil</u> , Mineral Spirits, Vegetable Oil, Other Non-Fuel Oils <u>Other than Used Oil</u>	≥210 gal	Sheen
State of Texas Reportable Quantities	Petroleum Fuels (e.g., <u>diesel</u> ), Used Oil, Spent/Contaminated Oil such as used paint thinner (definition of "oil" does not include compressed or liquefied gases such as LNG or propane)	≥25 gal	Sheen
Federal Reportable Quantities	Oil of Any Type	N/A*	Sheen

State regulations define the reportable quantities for oil spills onto land or sufficient oil in surface water to produce an oil sheen (30 TAC §327.4). Federal regulations only require notification of releases that produce a sheen on surface water, contaminate shoreline, or produce a sludge. Thus, if oil can be prevented from reaching surface water, only the Texas State Emergency Response Commission (SERC) Spill-Reporting Hotline would need to be notified. If a spill enters a stream, surface water body, or the storm sewer during wet weather flow (i.e., is capable of producing a sheen), then it must also be reported to the National Response Center.

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\* Most land-based oil (fuels and petroleum based products) spills are excluded from Superfund reportable quantities by the CERCLA Section 101(14) petroleum exclusion.

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lf th to <u>b</u> follo	ne s <u>poth</u> ow t	bill is determined to be reportable to the <u>state only</u> ( $\geq$ 25 gal or $\geq$ 210 gal onto land, see table above) or <u>the state and federal government</u> (spill reaches surface water and is capable of producing a sheen), hese steps as soon as possible but not later than 24 hours after the discovery of the spill :
1.	CC	DLLECT INFORMATION TO BE REPORTED
State	Federal	Check boxes indicate which information must be provided for State SERC notifications (30 TAC §327.3(d)) and which is required for Federal National Response Center notifications (40 CFR 300.405(d)). <b>DO NOT DELAY FOR LACK OF COMPLETE INFORMATION</b> !
		The name, address and telephone number of the person making the telephone report.
		Name and address of the party responsible for the incident.
		The date, time, and exact address or location of the spill or discharge.
		A specific description or identification of the petroleum product or other oil discharged or spilled.
		An estimate of the total quantity discharged or spilled into the environment.
		An estimate of the quantity discharged into or upon water in storm sewers, ditches or streams.
		The duration of the incident.
		The name of the surface water or a description of the waters in the state affected or threatened by the dischar or spill.
		The cause / source of the discharge or spill.
		A description of the extent of actual or potential water pollution or harmful impacts to the environment and an identification of any environmentally sensitive areas or natural resources at risk.
		If different from the person making the report, the names, addresses, and telephone numbers of the responsib person and the contact person at the location of the discharge or spill.
		A description of any actions that have been taken, are being taken, and will be taken to contain and respond to discharge or spill.
		Whether an evacuation may be needed.
		Any damages or injuries caused by the discharge.
		Any known or anticipated health risks.
		The names of individuals and/or organizations who have also been contacted.
		The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill.
		Weather conditions at the incident location.
		Any other information that may be significant to the response action.
2.	<u>IM</u> wh	<u>MEDIATELY</u> CONTACT THE FOLLOWING (as indicated by the size of the spill and the ether or not it reaches surface water)
	→	State Emergency Response Commission's <b>Spill-Reporting Hotline</b> at <b>1-800-832-8224</b>
	→	Federal <u>National Response Center</u> at <u>1-800-424-8802</u> or, if you have Internet access, use the <u>NRC On-</u> Line Reporting Tool at:
		http://www.nrc.uscg.mil/nrchp.html

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

*IF and ONLY IF* one of the following reportable discharge events occurs:

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

Submit information to the EPA Region VI Administrator (RA) in Dallas and the Texas Commission on Environmental Quality (TCEQ) within 60 days of the event.

#### The following information will be submitted to the RA:

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

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# Section 5. Additional Plan Requirements – Onshore Facilities (excl. production) (§§112.8(b)-(d))

A&M-Central Texas meets the general rule requirements as well as requirements under this section. Note that not all provisions are applicable. In cases where a provision is not applicable, the cells are greyed and the "N/A" box is checked in the right column.

Table G-10 General Rule Requirements for Onshore Facilities		N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and 112.12(b)(1)]		
Valves of manual, open-and-closed design are used for the drainage of diked areas. [§§112.8(b)(2) and 112.12(b)(2)]		$\boxtimes$
The emergency generator tanks and transformers at A&M-Central Texas are designed to accepted industry standards for the materials that they contain, including material compatibility and conditions of storage such as pressure and temperature. [§§112.8(c)(1) and $112.12(c)(1)$ ]	$\boxtimes$	
Secondary containment for the <u>emergency generator, double-walled</u> bulk storage containers (including mobile/portable oil storage containers) holds slightly more than the capacity of the largest <u>inner tank</u> containers plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]	$\boxtimes$	
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the Following procedures will be implemented at the facility: [§§112.8(c)(3) and 112.12(c)(3)] • Bypass valve is normally sealed closed • Retained rainwater is inspected to ensure that its presence will not cause a discharge to — navigable waters or adjoining shorelines • Bypass valve is opened and resealed under responsible supervision • Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3]		
For completely buried metallic tanks installed on or after January 10, 1974 at this facility [§§112.8(c)(4) and 112.12(c)(4)]: Tanks have corrosion protection with coatings or cathodic protection compatible with local soil		
conditions. • Regular leak testing is conducted.		
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]: <ul> <li>Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions.</li> </ul>		$\boxtimes$
Each aboveground bulk container (i.e., <b>emergency generator fuel tank</b> ) is tested or inspected for integrity on a regular schedule and whenever material repairs are made according to <b>Steel Tank</b> <b>Institute standard SP001 (see the introduction to Attachment 3, which describes the basis for the selected inspection and testing program).</b> Scope and frequency of the inspections and inspector qualifications are in accordance with the STI industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.8(c)(6) and §112.12(c)(6)(i)]		
Outsides of bulk storage containers (i.e., <b>emergency generator fuel tanks</b> ) are frequently inspected for signs of deterioration, or discharges, or accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]	$\boxtimes$	
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of		$\boxtimes$

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Table G-10 General Rule Requirements for Onshore Facilities		N/A
austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted		
on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are		
documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule		
in Attachments 3.1 and 3.2] [§112.12(c)(6)(ii)]		
Each bulk storage container is provided with a system or documented procedure to prevent overfills for		
the container.	$\boxtimes$	
Backup Generator Diesel Fuel Transfer Procedures & Spill Response: Even though the emergency		
generator fuel tanks are equipped with overfill prevention, release scenarios suggest that a spill, however		
unlikely, may occur due to container overfill or fill line rupture. Any such spill is likely to be less than five		
gallons and should not threaten navigable waters. Facility staff or contractors who maintain and refuel or		
top-off generators are:		
• Trained in fuel transfer / spill prevention procedures (see the general Oil Transfer Procedure		
Checklist below;		
<ul> <li>Provided with facility contact information should a spill occur or irregular condition be observed;</li> </ul>		
and		
<ul> <li>Supplied with on-board drain-covers and spill control / cleanup supplies to handle small spills.</li> </ul>		
Fuel vendor personnel visually inspect tank and fuel levels with a calibrated dip stick, and preset the		
quantity of fuel to be transferred from the tank truck to help ensure there is no overfill. In the event of		
overfill, the tanks have a built in five (5) gallon spill containment bucket designed to capture overfill.		
Electrical Transformers: All electrical transformers are sealed and locked. They contain either Biotemp		
or FR3 Envirotemp Natural Ester Fluid as the cooling oil, a biodegradable cooling fluid. No one on		
campus is gualified to open the transformers. Any required maintenance is performed by a gualified		
electrician using the proper Personal Protective Equipment (PPE) and lock-out/tag-out procedures.		



	General Oil Transfer Procedure Checklist* (*also to be used for training and awareness)
Stage	Task
	Verify that the tank truck and the storage tank/container contain the right (intended) product.
9	Visually check all hoses for leaks and wet spots.
	Verify that sufficient volume (ullage) is available in the storage tank or truck.
	Lock in the closed position all drainage valves of the secondary containment structure.
	Secure / protect nearby storm water inlets from possible spills (e.g., using inlet covers or sorbent socks).
	Secure the tank vehicle with wheel chocks and interlocks.
<u> </u>	Ensure that the vehicle's parking brakes are set.
	Verify proper alignment of valves and proper functioning of the pumping system.
A A	If filling a tank truck, inspect the lowermost drain and all outlets.
	Establish adequate bonding/grounding prior to connecting to the fuel transfer point.
	Turn off cell phone.
	Driver must stand by valves at all times while loading or unloading product.
	Periodically inspect all systems, hoses and connections.
	When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.
	When making a connection, shut off the vehicle engine. When transferring Class 3 materials, shut off the vehicle engine unless it is used to operate a pump.
	Maintain communication with the pumping and receiving stations.
5 _	Monitor the liquid level in the receiving tank to prevent overflow.
	Monitor flow meters to determine rate of flow.
	When topping off the tank, reduce flow rate to prevent overflow.
	Make sure the transfer operation is completed.
9	Close all tank and loading valves before disconnecting.
	Securely close all vehicle internal, external, and dome cover valves before disconnecting.
A A A	Secure all hatches.
	Disconnect grounding/bonding wires.
	Make sure the hoses are drained to remove the remaining oil/product before moving them away from the connection. Use a drip pan.
	Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
	Remove and stow storm water inlet protection (e.g., covers or sorbent socks)
j j	Remove wheel chocks and interlocks.
	Inspect the lowermost drain and all outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.
G /	If a spill occurs, use on-board cleanup supplies to contain and absorb the spill.
SPILL SPON	If a spill threatens a storm sewer inlet, ditch, stream or other surface water, attempt to block the flow path and inlets.
	Immediately call 911 for emergency dispatch and report the problem.

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Remain with the spill until the campus oil spill response coordinator (RC) and/or first responders arrive and take control of the incident.

Table G-10 General Rule Requirements for Onshore Facilities (continued)		
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and		
Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]		
Visible discharges which result in a loss of oil from the container, including but not limited to seams,		
gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and <u>any leaked</u> oil in diked areas	$\boxtimes$	
is promptly removed. [§§112.8(c)(10) and 112.12(c)(10)]		
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and		
bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. [See	$\boxtimes$	
Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]		
Integrity and leak testing are conducted on buried piping at the time of installation, modification,		
construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1]		$\square$
[ <del>§§112.8(d)(4) and 112.12(d)(4)]</del>		

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

#### Attachment 1.1 – Five Year Review Log

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

Table G-13 Review and Evaluation of SPCC Plan for Facility				
Review Date	Plan Am	endment	Name and Signature of person authorized to review this	
Neview Date	Will Amend	Will Not Amend	Plan	
07/20/19	$\boxtimes$		Shawn Kelley	
05/08/19			Shawn Kelley	

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# Attachment 1.2 – Technical Amendment Log

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

	Table G-15 Description and Certification of Technical Amendments				
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment			
05/08/19	Added a new building with a transformer and backup generator. Total oil volume with the addition of building #3 is still under the 10,000 limit at 2,176 gallons.	Shawn Kelley			

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## ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

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

- Flowlines and intra-facility gathering lines at oil production facilities and
- Qualified oil-filled operational equipment which has no secondary containment.

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

The completed checklist below verifies that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included. See the attached <u>General Oil Spill Contingency</u> <u>Plan</u> prepared according to the EPA contingency plan template for full details.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5)<sup>a</sup> (a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to  $\times$ be involved in planning or directing oil removal operations. (b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including: 1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.  $\boxtimes$ 2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates)  $\boxtimes$ and organizations to be notified when an oil discharge is discovered. 3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and  $\boxtimes$ the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP). 4) An established, prearranged procedure for requesting assistance during a major disaster or when the  $\boxtimes$ situation exceeds the response capability of the State, local or regional authority. (c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:

- 1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.
- 2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.

3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.

(d) Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including:

- 1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.
- 2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.
- 3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.

4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.

5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.

6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.

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

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

Steel Tank Institute (STI) SP001 is an accepted industry standard for inspecting tanks. A&M-Central Texas has adopted this standard as the guide for tank inspections and maintenance. Three key factors affect decisions about inspection and testing frequencies.

- Whether the tank is shop built, field erected or portable
- For shop built tanks, the tank capacity in gallons
- Installation type and risk to the environment

Table ATT3.1 covers the initial categorization of tanks and containers based on the first two factors, as well as the associated inspection and testing types and schedules. According to the table, tanks/containers at A&M-Central Texas are shop-built with capacities  $\leq$ 1,100 gallons, making them potentially Category 1, 2 or 3 small tanks. Categorization is not complete without considering the third factor, installation type. STI Table ATT3.2 would categorize emergency generator tanks as AST Category 1 and transformers as AST Category 3, but, as indicated in the footnotes to the table, SPCC regulations exclude transformers from integrity testing because they are oil-filled operational equipment.

Accordingly, for this A&M-Central Texas SPCC Plan, inspections and integrity testing shall consist of monthly and yearly, respectively, external inspections conducted by trained owner (i.e., university) staff or contractor without the need for formal internal and external inspections by Certified Inspectors. In preparing the SPCC plan and with new installations, care will be taken to categorize tanks/containers that may fall outside of Category 1 small tanks or containers.

#### Table ATT3.1 Inspection Schedule/Table According to STI SP001

**P**–Periodic Inspection by Owner **E**-External Inspection by Certified Inspector I-Internal Inspection **L**-Leak Test. Numbers in () indicate required inspection/testing frequency

Size, Gallons		Category 1	Category 2	Category 3
	0 – 1100	P (emergency generator tanks)	Р	P (transformers), E&L(10)
Shop built tank	1101 - 5,000	Р	P, E&L(10)	[P, E&L(5), I(10)] or [P, E(5) & L(2)]
	5,001 - 30,000	P, E(20)	[P, E(10)& I(20)] or [P, E(5) & L(10)]	[P, E&L(5), I(10)] or [P, E(5) & L(1)]
	30,001 - 50,000	P, E(20)	P, E&L(5), I(15)	P, E&L(5), I(10)
Field Erected Tank		P, E(5), I(20)	P, E(5), I(20)	P, E(5), I(20)
Portable Container		Р	Р	P **

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#### **Tank Categories**

Assigned by STI on the basis of installation type and risk to the environment:

• Scope: Applies to tanks/containers holding flammable or combustible liquids or other oils with specific gravity near 1.0, temperatures from ambient up to 200° F and at or near atmospheric pressure.

• **CRDM** - Continuous Release detection Method is a means of passively detecting a release of liquid through inherent design. Releases are <u>visually detected</u> by facility operators. CRDM types include (1) tanks with Release Prevention Barriers (RPB), (2) Secondary containment tanks including double-wall ASTs, and (3) elevated tanks/containers.

• **RPB** is a liquid containment barrier under the tank/container that diverts any leak toward the perimeter where it can easily be seen. An RPB can be a concrete foundation (e.g., pad-mounted transformers, tanks on concrete or portable containers on concrete or spill-containment pallets)

• Spill Control is a passive means of preventing release to the environment and includes remote impounding, secondary containment dikes/berms, and double-walled tanks/containers.

Tank Configuration	Tank has CRDM?	Tank has Spill Control?	AST Category
Single wall AST in contact with around	No	No	3
	No	Yes	2
Elevated tank (on grills, gratings or supports)	Yes	Yes	1
AST with RPB	Yes	Yes	1
AST with double-bottom	Yes	Yes	1
Double-wall AST with overfill prevention*	Yes	Yes	1
Double-wall AST without overfill prevention	Yes	No	3
Vertical tank resting on concrete	Yes	Yes	1
(conforms with definition of RPB)**	Yes	No	3

#### Table ATT3.2 Example tank configurations and categories are listed in the table below

\* A&M-Central Texas emergency generator diesel fuel tanks are double-wall ASTs with overfill prevention and are thus categorized as AST Category 1 (highlighted here in green).

\*\* Pad-mounted transformers at A&M-Central Texas would be technically equivalent to vertical tanks resting on concrete without spill control (e.g., no secondary-containment moat) and would be normally be classed as AST Category 3. If they were bulk storage containers, they would require passive, sized secondary containment and periodic integrity testing according to 40 CFR §112.8(c)(2) and (6). However, SPCC regulations exclude transformers

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from the definition of *bulk storage container* and instead define them as *oil-filled operational equipment* (§112.2), which is not included in the sized secondary containment and integrity testing requirements of §112.8.

#### Attachment 3.1 – Monthly Inspection

Table G-16 Inspection Form

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

### SPCC Monthly Inspection Form

#### **General Inspection Information:**

Inspection Date:	(Retain inspection record for at leas	st 36 months from inspection da	ate)	
Inspector Name: Printed Name and Signature Tanks / Containers Inspected	d (ID #'s):	UIN:	Dept.:	
	· · · /			

#### Inspection Guidance:

- Who can perform inspections? This periodic inspection covers easily observable condition of bulk storage tanks/containers, oil-filled operational equipment, and containment structures. It <u>does not require a certified inspector and may be performed by any trained person</u> who knows the site and can identify changes and developing problems......
- ✓ Where available, follow the manufacturer recommended inspection/testing schedules and procedures.
- ✓ Upon discovery of water in the primary tank/container, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect water for oil or other regulated products and disposed of it properly.
- Non-conforming items important to tank/container or containment integrity may require evaluation by an experienced engineer, inspector, or manufacturer representative to determine the corrective action. Note non-conformances and corrective actions in the comment section.
- ✓ Retain the completed checklists for 36 months.

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- ✓ In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.
- A <u>YES</u> indicates a non-conformance requiring action to address an observed problem. Whenever possible, immediately correct an observed problem.

	Item		itus	Comments
			NO	(Include tank/container number(s) and describe the deficiencies.)
1.0	Primary and Secondary Containment			
1.1	Noticeable distortions, buckling, denting, bulging, rust, loss of coating or other physical deterioration of primary container?			
1.2	Tanks / containers improperly positioned or stored?			
1.3	Water in primary container, secondary containment, interstice, or spill container?			
1.4	Secondary containment dikes, walls, moats or curbs <u>not</u> in good condition?			
1.5	Debris or fire hazard in containment?			
1.6	Drain valves inoperable or found in the open position?			
1.7	Egress pathways obstructed or gates/doors inoperable?			
2.0	Leak Detection	•		
2.1	Visible signs of leakage from or around the <b>1</b> . tank or container, <b>2</b> . support pad or foundation, <b>3</b> . secondary containment, <b>4</b> . surrounding storage area or ground or <b>5</b> . interstice?			
3.0	Tank Equipment, Attachments and Appurtenances			

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	Item		itus	Comments
			NO	(Include tank/container number(s) and describe the deficiencies.)
3.1	Liquid level gauge (if present) unreadable or in poor condition?			
3.2	Any tank / container valves or openings improperly sealed?			
3.3	Any aboveground valves, piping, or appurtenances in poor condition?			
3.5	Spill containment box on fill pipe filled with debris or water or overfill alarm or valve inoperable (if so equipped)?			
3.4	Support structure, foundation, ladder and/or platform unsecure or showing signs of severe corrosion or damage?			
4.0	Facility Drainage and Other Conditions			
4.1	Diked or undiked drainage deteriorated or damaged?			
4.2	Campus/facility storm water outfalls show evidence of oil releases?			
4.3	Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?			
Additional Comments:				

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ltom	Status		Comments
item	YES	NO	(Include tank/container number(s) and describe the deficiencies.)

\* Form modified from Steel Tank Institute (STI) SP001 Monthly Inspection Checklist

...STI SP001 is the Steel Tank Institute industry standard for inspecting tanks. With very few exceptions, tanks within the A&M System are shop-built with capacities ≤5,000 gallons, making them Category 1 small tanks or portable containers. Accordingly, for SPCC and tank maintenance purposes, inspections and integrity testing can merely consist of periodic external inspections conducted by trained owner (i.e., university/agency) staff.

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#### Attachment 3.2 – Annual Storage Container Inspection – onshore facilities (excluding production)

To comply with integrity inspection requirement for bulk storage containers, A&M-Central Texas will inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard (STI SP001; see introduction to this Attachment for basis of tank/container rating and associated inspection and testing requirements). The following table lists both monthly and annual inspection requirements. Text with strikeout indicates not applicable at this time.

Table G-17 Bulk Storage Container Inspection Schedule					
Container Size and Design Specification	Inspection requirement				
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas				
55 to 1,100 gallons with sized secondary containment ( <u>Emergency</u> <u>Generator Tanks</u> )	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside				
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection. <sup>a</sup>	SP001)				
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection <sup>a</sup>	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards				
Oil-filled operational equipment (Transformers)	Monthly and annual visual inspection (annual inspection not required by EPA or the STI SP001 standard, but included in the SPCC Plan)				

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## **SPCC Annual Inspection Form**<sup>\*</sup>

#### **General Inspection Information:**

Inspection Date: (Retain inspection record for at least 36 months from inspection date)							
Inspector Name: Printed Name and Signature Tanks / Containers Inspected	UIN: (ID #'s):	Dept.:					
· · · ·	· · · · · · · · · · · · · · · · · · ·						

#### **Inspection Guidance:**

- Who can perform annual inspections? The annual inspection examines external conditions and meets the EPA's SPCC periodic integrity testing requirements (40 CFR §112.8(c)(6)) for Category 1 bulk storage tanks/containers and oil-filled operational equipment. This visual inspection does not require a Certified Inspector and may be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Tanks >5,000 gallons or Category 2 or 3 tanks require additional inspection and possibly testing by a Certified Inspector.†
- ✓ For equipment not included in this form, follow the manufacturer recommended inspection/testing schedules and procedures.
- 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 disposed 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 CFR 112.8(c)(8)(v)).
- 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.
- ✓ A <u>YES</u> designates an item in a non-conformance status. This indicates that action is required to address a problem.

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ltem		Status		Comments (Include tank/container number(s) and describe the
	Item	YES	NO	deficiencies.)
1.0	Primary and Secondary Containment			
1.1	Containment structure shows evidence of: • Holes or cracks in containment wall or floor • Washout • Liner degradation • Corrosion • Leakage • Paint failure • Tank settling			
2.0	Tank Foundation and Supports		<u>.                                    </u>	
2.1	Foundation shows evidence of settlement or washout?			
2.2	Concrete pad or ringwall is cracking or spalling?			
2.3	Supports shows signs of corrosion, paint failure, etc.?			
2.4	Water does not drain away from tank or container?			
2.5	Grounding strap is not secure or is deteriorated?			
3.0	Cathodic Protection			
3.1	For a galvanic cathodic protection system, is the system nonfunctional or the wire connections deteriorated?			
3.2	For an impressed current system, are the operational components (power switch, meters, and alarms) nonfunctional or in poor working order and are there missing records of hour meter, ammeter and voltmeter readings?			
4.0	Tank Shell, Heads and Roof			
4.1	Is the tank / container coating failing or deteriorated?			

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ltem		Status		Comments (Include tank/container number(s) and describe the
	item	YES	NO	deficiencies.)
4.2	Does the tank / container shell have dents, buckling, bulging, corrosion or cracking?			
4.3	Does the tank / container top have low points or standing water indicating slope problems?			
5.0	Tank Equipment			
5.1	Vent components not moving freely or vent passageways obstructed for: • Emergency vent covers • Pressure/vacuum vent poppets • Other moving vent components			
5.2	Are valves leaking, corroded or damaged?			
5.2.1	Anti-siphon, check or gate valve not properly operating?			
5.2.2	Pressure regulator valve not operating properly?			
5.2.3	Expansion relief valve not operating properly?			
5.2.4	Solenoid valve not operating properly?			
5.2.5	Fire and shear valves not operating properly?			
5.3	Interstitial leak detection equipment not working properly?			
5.4	Spill containment boxes (if present) on fill pipe compromised?			
5.5	Strainer in dirty or poor condition?			
5.6	Filter in poor condition, expired or leaking?			
5.7	Flame arrestors corroded or blocked?			
5.8	Leak detector for submersible pump systems failing, not the correct part, or improperly installed?			

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Itom		Sta	itus	Comments (Include tank/container number(s) and describe the		
	nem	YES	NO	deficiencies.)		
5.9	Liquid level equipment (if installed) not operating properly?					
5.10	Overfill equipment not suitable or not functioning according to design?					
6.0	Insulated Tanks					
6.0	Damaged or missing insulation?					
6.2	Damaged insulation cover or jacket?					
7.0	Miscellaneous					
7.1	Electrical wiring and boxes damaged or in poor condition?					
7.2	Labels and tags missing, not intact, or unreadable?					
7.3	Drainage control inadequate for transfer/fueling areas and piping?					
7.4	Barrier system to protect against vehicular impact damaged, missing or inadequate?					
7.5	Security not adequate or is inconsistent with SPCC plan requirements?					
7.6	Fuel/oil transfer procedures not posted or being followed?					
7.7	Spill control equipment and supplies not adequate?					
Additi	onal Comments:					

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ltom	Status	Comments (Include tank/container number(s) and describe the		
	YES NO	deficiencies.)		

\* Form modified from Steel Tank Institute (STI) SP001 Monthly Inspection Checklist

+ STI SP001 is the Steel Tank Institute industry standard for inspecting tanks. With very few exceptions, tanks/containers within the A&M System are shop-built with capacities ≤5,000 gallons, making them Category 1 small tanks or portable containers. Accordingly, for SPCC and tank maintenance purposes, inspections and integrity testing can merely consist of periodic external inspections conducted by trained owner (i.e., university/agency) staff. For oil-filled operational equipment, although not required, annual inspection will be done along with normal annual maintenance.

#### Attachment 3.3 – Dike Drainage Log – onshore facilities (excluding production)

There is no diked drainage at A&M-Central Texas. If this changes in the future, the following drainage log will be employed.

## Table G-18 Facility Drainage and/or Bulk Storage Drainage Log

			Name of Responsible Person	-	UIN#	-	Signature	-
		Equipment		Bypass	Retained	Valve reclosed	Drainage	
Date	ID #	Туре	Building Name	valve found closed	water free of oil	after drainage	activity supervised	Observations

	Name of Responsible Person	UIN#	Signature	

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

	Table G-19 Oil-Handling Personn	el Training and Briefing Log
Date	Description / Scope	Attendees
	Training covers components of our site specific	
	SPCC plan, overview of SPCC regulations,	
	preventive inspection procedures and	
	responsibilities, notification procedures in event	
	location of spill control media and equipment	
	storm sewer drainage plans responsibilities for	
	inspection logs and reporting oil discharges.	

# **ATTACHMENT 4 – Discharge Notification Form**

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

NSM UNIVE	Texas A&M University-Central Texas				
	Spill Prevention, Control & Countermeasure Plan Level 2	Program:	Environmental Management		
		Doc. No.:	ENVM-24-L2-S14-CH4-001		
*		Rev No:	000		
Centre Mar		Date:	07/20/2015		
VIRALIL		Office:	A&M-Central Texas Safety & Risk Management		

		Table G-20 Information provided to the National Response Center in the Event of a Discharge			
If the spill is determined to be reportable to the <u>state only</u> ( $\geq$ 25 gal or $\geq$ 210 gal onto land, see table above) or to <u>both the state and</u>					
fed	federal government (spill reaches surface water and is capable of producing a sheen), follow these steps as soon as possible but				
not	not later than 24 hours after the discovery of the spill:				
1.					
0	eral	Check boxes indicate which information must be provided for State SERC notifications (30 TAC §327.3(d))			
tate	ede	and which is required for Federal National Response Center notifications (40 CFR 300.405(d)).			
Ś	ц	DO NOT DELAY FOR LACK OF COMPLETE INFORMATION!			
		The name, address and telephone number of the person making the telephone report.			
		Name and address of the party responsible for the incident.			
		The date, time, and exact address or location of the spill or discharge.			
		A specific description or identification of the petroleum product or other oil discharged or spilled.			
		An estimate of the total quantity discharged or spilled into the environment.			
		An estimate of the quantity discharged into or upon water in storm sewers, ditches or streams.			
		The duration of the incident.			
		The name of the surface water or a description of the waters in the state affected or threatened by the dischar			
		or spill.			
		The cause / source of the discharge or spill.			
		A description of the extent of actual or potential water pollution or harmful impacts to the environment and an			
		identification of any environmentally sensitive areas or natural resources at risk.			
		If different from the person making the report, the names, addresses, and telephone numbers of the responsib			
		person and the contact person at the location of the discharge or spill.			
		A description of any actions that have been taken, are being taken, and will be taken to contain and respond to			
_		discharge or spill.			
		Whether an evacuation may be needed.			
		Any damages or injuries caused by the discharge.			
		Any known or anticipated health risks.			
		The names of individuals and/or organizations who have also been contacted.			
		The identity of any governmental representatives, including local authorities or third parties, responding to the			
		discharge or spill.			
		Weather conditions at the incident location.			
		Any other information that may be significant to the response action.			
2.	IM	MEDIATELY CONTACT THE FOLLOWING (as indicated by the size of the spill and			
	wh	ether or not it reaches surface water)			
	→	State Emergency Response Commission's Spill-Reporting Hotline at 1-800-832-8224			
	→	Federal National Response Center at 1-800-424-8802 or, if you have Internet access, use the NRC On-			
		Line Reporting Tool at:			
		http://www.nrc.uscg.mil/nrchp.html			

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# **ATTACHMENT 5 – Facility Diagram**



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# TAMUCT Land Space Topography

A spill could potentially reach North Reese Creek, then Reese Creek and then possibly the Lampasas River.





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