EMERGENCY RESPONSE PLAN

Environmental Health and Safety

SECTION 8

Updated: **05/2008** **03/2012**
03/2009 **12/2013**
03/2010

Environmental Health and Safety- Norm Payne and Tom Rathbone

Role:

To act as safety officer for College to identify hazardous situations;

To serve as resource both to internal departments and officers and external agencies on issues of environmental, chemical, fire, radiological and public health during all emergency incidents;

To notify local, state and/or federal agencies if appropriate; (See Appendix to Section)

To work with the Incident Commander at Incident Command Post;

To provide guidance during incident recovery;

To monitor potable water supply and sewage systems and to prevent public health hazards due to contamination;

To monitor sanitary conditions in any shelter areas.

Environmental Health and Safety -- Checklist

_ Respond to emergency notification.

_ Notify relevant campus, local, state and/or federal agencies if required.

_ Assess need for EHS response and contact appropriate staff.

_ Notify appropriate regulatory agencies about details of incident if required.

_ Provide proper chemical, biohazard and/or radiological hazard information to emergency response agencies and medical personnel.

_ Determine if radioactive materials and/or radioactive contamination are a problem and take appropriate steps to secure area and arrange for decontamination procedures.

_ Determine if situation could produce release of bio-hazardous materials in the environment and if so take proper precautions to prevent release or begin decontamination procedures.

_ File any required forms or reports with regulatory agencies.

_ Arrange for potable water supplies and bathrooms if incident involves breach of safety of water supply.

_ Arrange for areas for disposal of food and other materials, such as laboratory specimens, subject to spoilage during loss of refrigeration.

- Provide information on environmental impacts and/or public health concerns related to disaster.

_ Arrange for decontamination areas, inform medical staff about specific radiological, chemical or biological health hazards to victims.

_ Arrange for containment and clean up of any chemical, bio-hazardous or radioactive spills.

_ Arrange for solid waste disposal sites on campus.

_ Monitor potable water supplies and sanitary sewer lines to be aware if public health of College personnel could be threatened.

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

Fire Safety Checklist

SECTION 8 Appendix 1

Updated: 03/2009 03/2012
03/2010 12/2013
03/2011

FIRE SAFETY CHECKLIST

_ Respond to emergency call-in and check in with University Police.

_ Gather information on status of incident; advise University Police of immediate needs if not yet addressed.

_ If chemicals are involved, provide Material Safety Data Sheets and chemical inventory list for use by HAZ-MAT personnel.

_ Discuss utility status with fire department and Facilities. Direct appropriate action.

_ Briefly note in writing all significant functions you perform or observe.

_ Monitor conditions and the action taken. Offer helpful comments when appropriate.

_ Update Emergency Operations Center and Facilities staff on an hourly basis or when significant events occur.

_ Provide appropriate information related to hazardous materials present at scene (chemical, radioactive, etc.) to medical personnel at scene, at Student Health Center or at Hospital Emergency Room.

_ Arrange a fire watch for areas unprotected by fire alarms or fire protection systems and arrange for a temporary fire alarm system for areas with sleeping facilities.

_ Notify the City of Oneonta Fire Department and NYS Office of Fire Prevention and Control of areas with out of service fire protection systems.

_ Participate in logistics and planning sessions.

_ Review fire protection water supply to College property and initiate necessary corrective action including arranging for water supply to be trucked in and placed in holding tanks.

_ Keep Incident Command Post/Emergency Operations Center advised of all actions taken and document.

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

Chemical Spill Safety Checklist

SECTION 8 Appendix 2

Updated: 03/2009 12/2013
03/2010
03/2011
03/2012

Chemical Spill Safety Checklist

*In the event of a very large oil/fuel spill or environmental damage, contact the NYS DEC Spill Hotline at 800-457-7362, Coast Guard National Spill Response Center at 800-424-8802. Otherwise notify Tom Rathbone or Norman Payne

_ Facilities notified by University Police Dispatcher of spill.
Tom Rathbone, home 286-9415, cell 435-1721, Westville Road, Milford, NY
Norman Payne , home 432-1856, cell 434-5941, Angel Drive, Oneonta, NY

_ UPD advises Facilities of situation by calling the office at 33224 or, if off-hours, call above numbers and leave a meaningful message (who, what why, where, and when) on phone.

_ Facilities responds to scene and checks in with University Police.

_ Facilities gains information on status of the incident and the extent of the problem. Advises University Police of any immediate needs if not yet addressed.

_ Facilities assembles MSDS's and calls in Haz Mat Team for response.

_ Facilities may request extra facilities staff to respond to emergency.

_ University Police takes charge of evacuation, crowd control and entry into area.

_ Facilities will direct University Police Dispatcher of any notifications required within the College, or with City, County, or State notification, if necessary.

_ Facilities to arrange for disposal of spill material through Hazardous Waste Management.

_ Facilities takes notes for preparation of narrative, writes report, with copy to University Police.

_ Update Emergency Operations Center, and College staff on an hourly basis or when significant events occur.

_ Facilities provides appropriate information related to hazardous materials present at scene (chemical, radioactive, etc.) to medical personnel at scene.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR A HAZARDOUS CHEMICAL SPILL/FIRE/EXPLOSION

In the event of an imminent or actual emergency situation on college property involving fire, explosion or hazardous waste release/chemical spill:

Appropriate emergency response is summoned by one or more of the following:

a. Activation of fire alarm system.
b. Dial 911 or 436-3550.

Either action will trigger an immediate response by University Police to summon assistance. University Police will respond with appropriate notification of Facilities Staff (listed above) and Oneonta Fire/Oneonta Police/State Police/NYS OFPC.

University Police will assume responsibility for crowd and traffic control. Appropriate Heating Plant personnel will be informed for response. (the spill control inventory is located in the heating plant, see Appendix 5,page 27 of Spill Prevention plan below for listed inventory.)

Ensure that personnel are evacuated at a sufficient distance away from the building.

Oneonta Fire Department will be met by University Police personnel and escorted to the emergency scene.

University Police will also contact Otsego County Emergency Services at 607-547-4226 or 911.

Upon arrival, Oneonta Fire will assume command of the scene and in coordination with University Police or the on-scene commander, take the necessary corrective actions. University Police will identify the character, source, amount and extent of any released materials to the extent practicable.

Concurrently, University Police or the on-scene commander will assess possible hazards to human health or the environment that may result from the release, fire or explosion. The assessment will consider both direct and indirect effects of the release.

The Associate Vice President for Facilities and Safety will report the release, if required, to DEC. In his absence, University Police will make the following reports:

NY DEC Spill Hotline 800-457-7362
National Response Center 800-424-8802

The report will include:

a) Name and telephone number of reporting official
b) Name and address of facility
c) Time and type of incident
d) Extent of injuries, if any
e) Possible hazards to health and environment
f) Fax number information can be sent
g) Contact information

During the emergency, Oneonta Fire and University Police will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur or spread to other

hazardous waste at the facility. These measures will include, where applicable, stopping processes and operations, collecting and containing related waste, and removing or isolating containers.

The Associate Vice President for Facilities and Safety or his designee will contact a hazardous waste contractor as required, such as:

Environmental Protective Svcs.	518-465-4000 preferred
Clean Harbors	518-434-0149
West Central Environmental	518-272-6891

The Associate Vice President for Facilities and Safety or his designee will coordinate waste collection, packaging and staging as required.

The Associate Vice President for Facilities and Safety will prepare reports as required to DEC or federal authorities, stating:

a. Name, address and telephone number of the facility
b. Date, time and type of incident (fire, spill, explosion, etc.)
c. Name and quantity of materials involved
d. Extent of injuries, if any
e. Extent of release of material to the environment

NO UNIVERSITY EMPLOYEE OR STUDENT WILL ENTER AN EMERGENCY SCENE UNLESS SPECIFICALLY REQUESTED TO DO SO BY THE DIRECTOR OF UNIVERSITY POLICE OR THE ON-SCENE COMMANDER.

IN ALL INSTANCES, NO UNIVERSITY EMPLOYEE OR STUDENT SHALL BE EXPECTED TO TAKE ANY UNREASONABLE RISK INVOLVING ACTIONS RELATING TO THE EMERGENCY.

EMERGENCY SPILL NUMBERS SHOULD BE PUT ON PHONE NUMBER PAGE

University Police	436-3550 or 911
Heating Plant	436-3551
MOC	436-2507
DEC	800-457-7362
National Response Center	800-424-8802
CHEMTREC	800-424-9300
Clean Harbors	518-434-0149
EPS	518-465-4000
Chemcept, Inc.	518-266-6331
Facilities and Safety	436-3224
OFPC Hazmat	518-474-6746
Otsego County Hazmat	607-547-5351

GENERAL LABORATORY CHEMICAL SPILL PROCEDURES

EMERGENCY SPILLS – VOLATILE, FLAMMABLE OR TOXIC MATERIALS

Background: The treatment of each chemical spill varies with the nature of the material spilled. Fortunately, OSHA requires the maintenance of files of Material Safety Data Sheets. These sheets detail the recommended spill, leak and containment and disposal procedures for each chemical.

MSDS's are available at the following locations:

1. Physical Science 206 (science department chemicals)
2. Milne B217 (maintenance department chemicals)
3. University Police 24 hour warning point Alumni Hall
4. SUNY Oneonta Facilities Department Web Site
    a. www.oneonta.edu/admin/facilities
    b. Click on the Oneonta SDS Program link

General Procedures: In that each chemical is unique, the procedures outlined in the SDS's must be followed. At a minimum, the appropriate supervisor or faculty department chair should be notified in the event of a spill. Depending on the chemical spilled, the Office of Facilities and Safety (436-3224) will be notified. The Associate Vice President for Facilities and Safety or his designee will determine reporting requirements. If the material must be disposed of via a contract waste hauler, the Associate Vice President for Facilities and Safety will arrange for such services in conjunction with the Purchasing Department. In the event the person spilling the chemical does not have the appropriate SDS, the Office of Facilities and Safety will obtain the SDS. The name of the manufacturer and chemical is required.

General Guidelines:

1. Leave the bottle, carton, etc., right where it fell! DO NOT attempt to handle the substance with bare hands.

2. Alert room occupants, turn off all ignition sources, and immediately evacuate the area. Close the door behind you to prevent further building contamination.

3. Pull the nearest building fire alarm box to alert other building occupants and to summon aid (MOC, University Police, Oneonta Fire, Oneonta Police, Otsego County Hazmat). Leave the building and call University Police 436-3550. Give your name, building name, room number of the spill and nature and extent of the spill. State if medical aid is required.

4. University Police and the Office of Facilities and Safety will ensure that the spill is cleaned up by properly trained and equipped personnel.

5. NO ONE IS TO ENTER THE AREA FOR GENERAL HOUSEKEEPING CLEAN-UP UNTIL UP HAS DECLARED THE AREA TO BE DE-CONTAMINATED AND SAFE.

6. If cleanup is directed, utilize Personal Protective Equipment as follows as required:

a. Eye protection: goggles or face shields
b. Skin: Tyvek suit and/or gloves.
c. Respirators: Authorized only for those personnel enrolled in the campus respirator program.

The above equipment is available from Facilities or MOC.

NON-EMERGENCY SPILLS

1. Leave the bottle, carton, etc., right where it fell. DO NOT attempt to handle the substance with bare hands.

2. Alert room occupants to the spill.

3. Contact the faculty in charge, the department chair or University Police at 436-3550. Give the name of the chemical spilled, manufacturer and any other pertinent information available.

4. MOC or Facilities and Safety will advise on the correct cleanup procedures. In certain instances, Physical Plant may perform minor cleanup procedures in the interest of safety. These cleanup procedures will be performed in conjunction with the personnel involved.

5. University Police will complete an incident form.

MERCURY SPILLS

In the event that the smallest level of mercury can be hazardous, the Office of Facilities and Safety will be informed of mercury spills in cases involving quantities larger than a thermometer break. Spill cleanup procedures will be implemented by the department. The Office of Facilities and Safety also has equipment available. In general, broken thermometers are collected and stored in a sealed zip-lock bag by the chemistry department until such time that the Facilities Department can arrange for their disposal in an economic quantity.

POST EXPOSURE PRECAUTIONS FOR ALL SPILLS

1. Skin, eye or mouth contact: Wash the affected area immediately with copious quantities of fresh, clean water. For eye exposure, rinse for 20 minutes.
2. Clothing: Remove the item of clothing immediately to avoid soaking through to the skin. Save the item for disposal.
3. Wash the contaminated area thoroughly with fresh water only. Do not use cleaning compounds due to the risk of reaction with the spilled chemical.

HAZARDOUS MATERIAL HIGHWAY SPILL

Background: SUNY Oneonta roadways are, generally speaking, public thoroughfares. A large spill of virtually any sort of material could be considered hazardous.

Procedures: University Police shall be notified. In turn, University Police will notify Oneonta Fire and Oneonta Police as required and provide the following:

1. Location of the accident and time of occurrence
2. Visual observations.
3. Placarding
4. Name of material and amount spilled.
5. Wind direction.

University Police will then take the following actions:

1. Close off the surrounding area.
2. Evacuate the area as necessary.
3. Interview the driver/passengers if safe to do so

The procedures in this document supplement the procedures outlined in the 2008 DOT Emergency Response guidebook.

The rescue of victims depends on the nature of each accident. It may be necessary to have victims rescued by trained professionals.

University Police will notify the Director of Physical Plant and the Assoc. Vice President for Facilities and Safety. In general, the Assoc. Vice President for Facilities and Safety will coordinate the reporting of the incident to the Department of Environmental Conservation. If he is unavailable, University Police will contact the following, as required:

Department of Environmental Conservation	607-652-7741
NY Oil Spill Hotline	518-457-7362
NY Dept of Health	607-432-3911
Otsego County Emergency Services	607-547-4328
EPA SARA Hotline	800-424-9346
CHEMTREC	800-424-9300

Detours will be the responsibility of University Police or other law enforcement agencies.

Emergency evacuation of buildings will be coordinated as required by University Police.

University Police will contact the Office of Community Relations as required if media interest is anticipated.

Emergency ambulance transportation will be coordinated by University Police.

In general, vehicles will not be immediately removed from the scene except to rescue victims or to achieve a cleanup.

If required, the following companies could be called for emergency cleanup:

EPS (preferred)	518-465-4000
Clean Harbors	518-434-0149
Chemcept, Inc.	518-266-6331

WHEN APPROACHING THE SCENE OF AN ACCIDENT INVOLVING ANY CARGO (NOT ONLY HAZARDOUS MATERIALS):

A. Approach the incident from up wind, if possible.
B. Move and keep people away from the incident scene if safe to do so.
C. Do not walk into or touch any spilled material.
D. Avoid inhaling fumes, smoke and vapors even if no hazardous materials are involved.
E. Do not assume that gases or vapors are harmless because of lack of smell.
F. Find out who is the on-scene commander and where the command post is located.

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

Emergency Incident Sanitation Checklist

SECTION 8 Appendix 3

Updated: 03/2009 03/2012
03/2010 12/2013
03/2011

Emergency Incident Sanitation Checklist

_ Determine what essential services are disrupted that could affect public health and how long they are expected to be out.

_ Determine the effect the incident has on level of general sanitation and how it could impact public health including the spread of communicable diseases.

_ Health care facilities, residential buildings or those containing public food service areas take priority in terms of response and corrective action.

_ Provide the appropriate response including technical advice, recommendations and manpower.

_ Notify relevant government agencies if needed or required. The possible agencies are:

- New York State Department of Health
- Otsego County Department of Health (607)547-4230 after hours (607)547-1697
- Otsego County Office of Emergency Services (607)547-5351
- City of Oneonta Water and Sewage Department (607)432-7210
- City of Oneonta Fire Department (607)433-3480

_ Advise support staff of response and report to the scene and check in at the command post.

_ Gain information on the status of the incident.

_ Arrange for potable water supplies and alternative restroom facilities if it appears that these services will be disrupted for a significant amount of time (usually longer than four hours but depends on the building's use).

_ Advise Facilities on the need to contact the Office of General Services to obtain emergency repair contractors.

_ Take the necessary steps to ensure the restored water supply is potable.

_ Leaks or breaks such as punctures, joint leaks or peripheral cracks can often be repaired with clamping devices without shutting off the line pressure. Under these circumstances, where line pressure is only slightly reduced, there is little danger of contamination and disinfection is not needed. Contact Department of Health consider biol-water order.

_ In food service establishments, ensure the safety of food supplies and dispose of product that is contaminated or suspected to be contaminated. Arrange for alternative storage of perishable foodstuffs during power outages if necessary. Suspend the operation if necessary and notify the Otsego County Department of Health that an imminent health hazard exists as required by law. An imminent health hazard is any violation, combination of violations, condition, or combination of conditions making it probable that the food or drink served to the public by the establishment or its continued operation can injure the health of the consumer or the public.

Any of the following three conditions are violations constituting imminent health hazards that require the establishment closed and all service of food stopped immediately:

1.) If a potable water supply within a food service establishment is not available, and if it reasonably appears it can result in an imminent health hazard, and if the operator does not use single service items and bottled water from an approved source for all potable water uses, the establishment is to be ordered closed and all food service to be stopped immediately.

2.) Any cross-connection or other fault in the potable water system which may permit contamination of the potable water supply is cause for an order for immediate closure and cessation of food service if it reasonably appears it can result in an imminent health hazard.

3.) If sewage or liquid waste is not disposed of in an approved and sanitary manner, the establishment should be closed and immediate cessation of all food service operations should occur if such sewage or liquid waste contaminates any food, food storage area, food preparation area, or area frequented by consumers or employees.

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

National Response Center

SECTION 8 Appendix 4

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03/2010
02/2012

National Response Center

Concern Inspires Response

People have been concerned about the environmental impact of oil spills for many years. Congress answered their concern in the early 1970s by passing the **Federal Water Pollution Act.** This new law called for a National Contingency Plan.

The **National Contingency Plan** answered the need for a rapid response to oil spills by creating a centralized reporting system that was easy to use. The **National Response Center** is the heart of that system.

The idea was simple. Anyone seeing a pollution incident would report it to the **NRC** by calling a toll free telephone number. Watch standers would then relay the report to the predestinated federal On Scene Coordinator **(OSC)** - a Coast Guard or Environmental Protection Agency official - near the spill.

The idea worked and the **NRC** has been an effective weapon in our pollution-fighting arsenal since 1974.

U.S. Coast Guard people man the National Response Center 24 hours a day, 7 days a week. They receive reports from every state, Puerto Rico, Guam and the Virgin Islands. Reports are entered in a computer data base and relayed to the proper **OSC.**

The **OSC** then advises the spiller that he is responsible for clean up. If the spiller assumes responsibility, the **OSC** monitors the clean up and ensures that it is done right.

If the spiller does not begin clean up, the **OSC** takes charge. He hires contractors and brings in federal equipment and people to do the job. The **OSC** also takes charge when the spiller assumes responsibility but does not do an adequate job of clean up.

A discharge of oil or **any** hazardous substance **must** be reported when it comes from a vessel or facility operating:

- in or along U.S. waters
- on the Outer Continental Shelf
- in a deep water port
- or, a vessel transporting oil from the Outer Continental Shelf

Additionally, any release of a reportable quantity of a hazardous substance must be reported.

If you have accidental spill transporting oil or hazardous materials, you must telephone the **NRC** as soon as possible, when:

- anyone is killed
- anyone is hospitalized
- property damage exceeds $50,000
- radioactive material is involved
- a disease-causing agent leaks

If you have a spill and do not report it, you may receive a criminal penalty of up to $10,000 and go to prison for up to one year.

Specific reporting requirements for oil spills are detailed in **Section 311(b)(5)** of the Federal Water Pollution Control Act; **Section 306(a)** of the Outer Continental Shelf Lands Act Amendments of 1978; and **Section 18(b)** of the Deep Water Port Act of 1974. Harmful quantities of oil are described in **40CFR110**.

Chemical spill reporting requirements can be found in **Section 103(a)** of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 **(CERCLA).** The description of a harmful quantity of hazardous substances can be found in **40CFR117.**

The discharge of oil or a hazardous substance **must** be reported by the person in charge of the facility, vehicle or vessel responsible.

Transportation accidents involving hazardous materials **must** be reported by the carrier. A threat to human health or the environment caused by an explosion, fire or release from any hazardous waste treatment or storage facility **must** be reported by the emergency coordinator at the facility.

THE CHEMTOX SYSTEM HOT LINE

Environmental

EPA Headquarters Hotline.....202-272-0167
EPA RCRA, Superfund, Hazardous Waste Hotline,
Office of Solid Waste.....800-424-9346
Emergency Response Chemical Emergency
Preparedness Hotline, CERCLA (SARA Title III) 800-535-0202
EPA Regional Office
- Region II 212-264-2525
- EPA 800-424-9346
- EPA Water Lab.....201-321-6645
- DEC Hazardous Waste 518-457-9257
- DEC Medical Waste 518-485-9394
- DEC Air Resources.....518-457-7230
- DEC Pesticides.....518-623-3671

Occupational Health and Safety

New York
- Department of Labor.....518-457-5508
- Asbestos Control.....518-457-2072
- US OSHA.....518-464-6742

Emergency Response

CHEMTREC (24-Hour Emergency Number)	800-424-9300
Department of Transportation (U.S. DOT) Hotline Information on CFR-49 Federal Regulations	202-366-4488
DOT National Response Center for Oil/Hazardous Materials Spills (U.S. Coast Guard)	800-424-8802

Other Numbers

TSCA (Toxic Substances Control Act)	800-424-9065
TSCA Hotline	202-554-1404
Inspector General's Whistleblower, Fraud, Waste and Mismanagement Hotline	800-424-4000
Federal Emergency Management Agency (FEMA)	202-566-1600
National Pesticide Telecommunications Network Hotline	800-858-7378
National Animal Poison Control Center (24 Hour Hotline) Operated at the University of Illinois	800-548-2423
U.S. Army Corps of Engineers	202-272-0001

General Chemical Information

Public Information Center	800-828-4445
Department of Health and Human Services	202-245-6296
National Resources Defense Council,	800-648-6762
INFOLINE on Household Chemicals (in NY State)	212-687-6862

Associations

Chemical Manufacturers Association (CMA)	202-887-1100
CMA Chemical Referral Center (Non-Emergency Chemical Information)	800-262-8200
National Safety Council (NSA)	312-527-4800
American Society of Safety Engineers (ASSE)	312-692-4121
National Fire Protection Association (NFPA)	617-770-3000
American Industrial Hygiene Association (AIHA)	703-849-8888
American Congress of Governmental Industrial Hygienists	513-661-7881
American Trucking Association (800-ATA-LINE)	800-282-5463

Hazardous Materials and Related Information Sources (Selected Listings)

Office of Emergency Services-Otsego County	607-547-5351/911
Department of Environmental Conservation	518-897-1243
Otsego County Health Department	607-547-4230/4273
Environmental Division	518-565-4870
CHEMTREC	800-424-9300
Bureau of Explosives	202-835-9500
National Response Center (USCG & EPA)	800-424-8802
Department of Defense Nuclear Accident Center	505-264-4667
U.S. Army Explosive Ordinance Disposal	301-667-5182
Center for Disease Control	404-663-5315
Poison Control Center	402-390-5400
American Petroleum Institute	202-457-7000
Chlorine Institute	212-682-4324
Compressed Gas Association	212-354-1130
Dow Chemical Company	517-636-4400
DuPont Corporation	302-774-7500
U.S. Department of Transportation	202-426-1830
National Transportation Safety Board	800-424-0201
U.S. Coast Guard	202-426-2158
U.S. Corps of Engineers	202-545-6700
Federal Emergency Management Agency	202-646-4600
U.S. Department of Agriculture	202-447-2791
U.S. Fish and Wildlife Services	202-343-5634

Discharge of a hazardous waste from an abandoned dumpsite should be reported by any person who sees the discharge.

If you see one of the incidents above, report it to the NRC.

Reporting is Easy

The **National Response Center** makes it easy for you to report an oil spill or hazardous chemical release. Your report insures a quick response from Federal officials. Call their toll free number to report:

- an oil spill
- a hazardous chemical release
- a pipeline accident
- a transportation accident involving hazardous materials
- a release of radioactive material

When you call

The people at the National Response Center need all the information you can give them about a spill. If possible, you should be ready to report:

- Your name
- Name of responsible party
- Mailing address of responsible party
- Telephone number where you can be reached
- Date and time of spill
- Location of spill
- Name of material spilled
- Source of the spill
- Amount discharged
- Amount in water
- Weather conditions
- Continuing danger to life or environment
- Name of manufacturer or shipper
- Consignee
- Number and type of injuries
- Amount of damage
- Description of cleanup plans
- Agencies that have been notified

Additional Help

CHEMTREC, the Chemical Transportation Emergency Center run by the Chemical Manufacturers Association and the NRC complement each other.

CHEMTREC has gathered technical information about more than 18,000 chemicals transported in the United States. During emergencies they can tell you the effect of a chemical on the environment and suggest methods for containment and control. They also maintain a directory of experts and industry cooperatives that can help in an emergency.

You may reach **CHEMTREC** by calling a toll-free number: **800-424-9300**. Remember, this number is for emergencies only!

REMEMBER: Calling CHEMTREC **does not** fulfill any requirement to report an accident or spill to the federal government.

NRC receives mandatory reports of spills and assists Federal On Scene Coordinators. **CHEMTREC** gives emergency information to carriers and emergency personnel. They work together to protect public welfare and the environment.

REPORT OIL SPILLS AND CHEMICAL RELEASES TO DEC **800-457-7362**

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

Spill Prevention, Fuel Tanks, Control and Contingency Plan

SECTION 8 Appendix 5

Updated: 03/2009 12/2013
03/2010
03/2012

Oil Spill Prevention Control and Countermeasure (SPCC) Plan

Prepared for

State University of New York
College at Oneonta
State University Plaza
Albany, New York 12246

Prepared by

RMF Engineering
Reliability. Efficiency. Integrity.

5520 Research Park Drive
Baltimore, Maryland 21228
(410) 576-0505 Fax: (410) 385-0327

Last Revised: October 2011 by RMF Engineering

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Appendices

INTRODUCTION

The U.S. Environmental Protection Agency (EPA) has promulgated regulations on oil pollution prevention in an effort to prevent discharges of oil to the nation's waters. The regulations were originally published in the Federal Register on 11 December 1973, and are further identified as 40 CFR Part 112.

The regulations on oil pollution prevention apply to non-transportation related facilities that reasonably could be expected to discharge oil into or upon the navigable waters of the United States or adjoining shorelines, and that have an aggregate oil storage capacity of over 1,320 gallons aboveground or 42,000 gallons underground. The State University College at Oneonta (hereafter SUCO facility) is a facility to which 40 CFR Part 112 applies. The main requirement for this facility is the preparation and implementation of an Oil Spill Prevention Control and Countermeasure (SPCC) Plan to prevent any discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. This SPCC Plan is prepared to address the regulatory provisions 40 CFR Part 112 for the SUCO facility. This facility is not required to submit a Facility Response Plan to EPA because it does not meet any of the criteria listed in 40 CFR Part 112.20(f)(1)(i) and (ii). As documentation, Appendix B contains a completed Certification of the Applicability of the Substantial Harm Criteria form, pursuant to the provisions of 40 CFR Part 112.20(e).

Table 1- Oil SPCC Regulation Cross Reference Table in Appendix A lists the requirements of Part 112 and the respective parts of this Plan that discuss the facility's conformance with those requirements. Except as specifically detailed, the facility is in conformance with the currently applicable portions of the Part 112 regulations that became effective August 16, 2002. [§112.3; §112.7; §112.7(a)(1)]

A copy of this SPCC Plan will be maintained onsite at the SUCO Heating Plant and at the Facilities and Safety Office and will be made available to the EPA Regional Administrator for review during normal working hours. [§112.3(e)]

This SPCC Plan will be amended whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of petroleum into or upon navigable waters of the United States or adjoining shorelines. Such amendments must be prepared within six months, and implemented as soon as possible, but no later than six months following preparation of the amendment. Each required Plan amendment would be subject to review and certification by a Licensed Professional Engineer (if applicable) and approval by management. [§112.5(a)]

The following table is a summary of bulk oil storage tanks on-site and their respective operations:

PETROLEUM BULK STORAGE TANK SUMMARY					
NYSDEC ID No. & Location	Size (gallons)	Product Stored	Underground/ Aboveground	Purpose	Secondary Containment
001				Closed 2011	Full closure and removal. Replaced with tanks 001 and 002.
002				Closed 2011	
003				Closed 2011	
004				Closed 2011	
005				Closed 2011	
001 Heating Plant	30,000	No.2 Fuel Oil	Underground	Heating Fuel	Double Wall UST
002 Heating Plant	30,000	No.2 Fuel Oil	Underground	Heating Fuel	Double Wall UST
A				Removed 2011	
G MOC	4,000	Gasoline	Underground	Vehicle Fuel	Double wall UST
H MOC	1,000	Diesel Fuel	Underground	Vehicle Fuel	Double wall UST
J Morris	150	Diesel Fuel	Aboveground	Generator	Single wall AST with generator. Concrete pad with curb.
L Milne	147	Diesel Fuel	Aboveground	Generator	Double wall AST with generator.
M				Removed	
N Alumni	140	Diesel Fuel	Aboveground	Generator	AST with generator. double walled
P				Removed 2011	
Q MOC	500	Waste Lube oil	Aboveground	Waste Lube Oil	Double wall AST
R MOC				Removed 2010	
S Admin	152	Diesel Fuel	Aboveground	Generator	Double wall AST
T Wilsbach	100	Diesel Fuel	Aboveground	Generator	Single wall AST with generator. Concrete pad with curb.
U Higgins	150	Diesel Fuel	Aboveground	Fire Pump	Double wall AST inside building
W Milne	500	Diesel Fuel	Aboveground	Generator	Double wall AST
X Heating Plant	500	No. 2 Fuel Oil	Aboveground	Generator	Double wall AST inside building

The label permanently affixed to the fill ports of Underground Storage Tanks G and H must include the following statements and information regarding the tank:

- "This tank conforms with 6 NYCRR Part 614;"
- The tank's manufactured standard of design;
- Petroleum products and percentage of volume of petroleum additives which may be stored permanently and compatibly within the tank;
- Year manufactured;
- Unique tank ID;
- Dimensions, design capacity, working capacity and model number;
- Manufacturer name;
- Installation date;
- For fiberglass-reinforced plastic tanks: "designed and manufactured in accordance with UL No. 1316." and;
- For cathodically protected steel tanks: "designed and manufactured in accordance with ULC-S603 and ULC-S603.1."

Tanks G and H at the SUCO facility are subject to jurisdiction under 40 CFR Parts 280 and 281. These tanks are included (as appropriate) in this SPCC Plan, as required by EPA guidance. The locations of these tanks are marked on the Facility Site Plans (Appendix C).

SPCC PLAN APPROVALS AND REVIEWS

PROFESSIONAL ENGINEERING CERTIFICATION

I hereby attest and certify that: (i) I am familiar with the requirements of 40 CFR Part 112; (ii) I (or my agent) have visited and examined the facility; (iii) this SPCC Plan for the State University College at Oneonta (SUCO) located at 108 Ravine Parkway - Oneonta, New York 13820 has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112;
(iv) procedures for required inspections and testing have been established in this SPCC Plan; and (v) this SPCC Plan is adequate for the facility. Employees working at this facility have provided certain information in this SPCC Plan. It is understood that the management of this facility also certifies that the information provided is true and accurate. This certification does not relieve the facility of its duty to implement this SPCC Plan in accordance with 40 CFR Part 112.
[§ 112.3(d)(1); § 112.3(d)(2)]

Name:
License No.:
State:
Date:

Signature (Seal)

WARNING: *It is in violation of New York State Education Law, Article 145, Section 7209, Special Provision 2, for any person unless he is acting under the direction of a Licensed Professional Engineer or Land Surveyor to alter an item in any way. If an item bearing the seal of an Engineer or Land Surveyor is altered, the altering Engineer or Land Surveyor shall affix to the item his/her seal and notation "Altered By" followed by his/her signature and date of such alteration, and a specific description of the alteration.*

Management Approval

By acceptance of this certified SPCC Plan, and incorporation of the Plan into the site's standard operating procedures, the management of the SUCO will commit the necessary equipment, resources, and manpower to implement this SPCC Plan as described herein.

Thomas Rathbone Date
Associate Vice President for Facilities and Safety
State University College at Oneonta

Five-Year SPCC Plan Review and Evaluation

The owner and/or operator of the facility must conduct a review and evaluation of this Oil Spill Prevention Control and Countermeasure Plan (SPCC Plan) at least once every five years. This SPCC Plan must be amended within six months of each review and evaluation to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a discharge of petroleum in quantities that may be harmful (as described in 40 CFR Part 110) into or upon the navigable waters of the United States or adjoining shorelines; and (2) such technology has been field-proven at the time of review. Any technical amendment(s) to this SPCC Plan must be reviewed and certified by a Licensed Professional Engineer within six months after a change in the facility, design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines. [§ 112.5(b); § 112.5(c)]

I as an authorized management representative of the owner and/or operator have completed a five-year review of this SPCC Plan, and determined that (*check one*):

[ ] Significant changes to the facility have occurred since the last review, and therefore this SPCC Plan must be appropriately updated and re-certified by a Licensed Professional Engineer.

[ ] Only non-technical amendments to this SPCC Plan were necessary, and they have been made.

[ ] No amendment to this SPCC Plan is necessary at this time, per 40 CFR §112.5(b).

Reviewer's Name and Title:	
Reviewer's Signature and Date:	

Professional Engineer's recertification, if technical amendments are made to this SPCC Plan

I hereby attest and certify that: (i) I am familiar with the requirements of 40 CFR Part 112; (ii) I (or my agent) have visited and examined the facility; (iii) this SPCC Plan for the State University College at Oneonta located at 108 Ravine Parkway Oneonta, New York 13820 as been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112; (iv) procedures for required inspections and testing have been established in this SPCC Plan; and (v) this SPCC Plan is adequate for the facility. Employees working at this facility have provided some of the information in this SPCC Plan. It is understood that the management of this facility also certifies that the information provided is true and accurate. This certification does not relieve the facility of its duty to implement this SPCC Plan in accordance with 40 CFR Part 112.

Printed Name of Professional Engineer:	
Signature of Professional Engineer and Date:	
P. E. Registration Number: (*Apply P. E. seal over the written information*)	

FACILITY IDENTIFICATION AND SUMMARY DESCRIPTION

Name of Facility:	State University of New York College at Oneonta
Address of Facility:	108 Ravine Parkway Oneonta, New York 13820
Name of Owner:	State University of New York
Owner's Address:	State University Plaza, Albany, New York 12246
Primary Facility Contact:	Terry Zimmerman **Director of Facilities Operations**
Primary Contact's Work Phone: Primary Contact's Off-Hours Phone: Primary Contacts Cellular Phone:	(607) 436-2507 (607) 434-7314 (607) 434-7214
Plan Coordinator and Emergency Contact	Thomas Rathbone Associate Vice President for Facilities and Safety
Emergency Contact's Work Phone: Emergency Contact's Off-Hours Phone: Emergency Contact's Cellular Phone	(607) 436-3224 (607) 286-9415 (607) 435-1721
Alternate Emergency Contact: Emergency Contact's Work Phone: Emergency Contact's Off-Hours Phone: Emergency Contact's Cellular Phone	Norm Payne (607) 436-3224 (607) 432-1856 (607) 434-5941

(Note: Facility contact information can be updated in ink in the remaining space.)

The facility contact is the person directly accountable for oil spill prevention and response (i.e., the facility's **SPCC Coordinator**). [§112.7(f)(2)]

The College at Oneonta is one of several colleges of arts and science within the State University of New York. Established in 1889 as a school to train teachers, it was a founding member of the SUNY system in 1948. Total student enrollment in approximately 5,800 and total college employment in approximately 1,100, including faculty and staff. There are 40 institutional and support buildings on the 250-acre SUCO campus.

All liquid fuels and oils are delivered to and transported from the facility via tank truck. Appendix C contains Figures 1 through 4 – Site Location Map and Area Oil SPCC Site Plans (i.e., the facility diagram; not to scale) that include at a minimum: (1) the general facility layout, including the location and contents for all bulk storage tanks and all other fixed containers with a capacity of 55 gallons or greater; (2) the facility area(s) where mobile and portable containers with a capacity of 55 gallons or greater are stored; (3) all oil transfer stations and connecting pipes; (4) all tank truck loading and unloading areas; (5) the general facility surface drainage pattern, including, at a minimum, sufficient information identifying drainage patterns from all outdoor container locations, including all bulk storage tank locations, and all tank truck loading and unloading locations; and (6) an indication of each area where spill response equipment is normally stored. [§112.7(a)(3)]

Nearly all buildings are heated from a central Heating Plant situated in the center of campus. The primary fuel for the Heating Plant is natural gas, provided by pipeline. Backup fuel is number 2 fuel oil, stored in 2 each 30,000 gallon tanks at the plant, constructed in 2011.

Most buildings have elevators which are operated hydraulically and as a result contain a supply of hydraulic fluids. Also, college dining halls collect and contain cooking grease for disposal by commercial firms. Several drums of used fryer oil and grease are stored inside the service entrance for Mills Hall prior to pickup.

OIL STORAGE INVENTORY AND POTENTIAL DISCHARGES

The SUCO facility has petroleum storage facilities for boiler operation, emergency electricity generation, motor vehicle fueling, kerosene and used oil storage. The facility has two heating oil main fuel storage tanks, two bulk tanks for vehicle fuel, seven emergency electricity generators, two main buildings where oil-handling operations occur and numerous locations around campus where oil and fuel are managed. Figures 1 through 4 of Appendix C depict the location of each stationary tank, normal storage locations for drums and other portable containers, as well as the tank truck unloading areas at the facility.

The petroleum bulk storage tanks at the SUCO facility store No. 2 fuel oil for boiler operations (Tanks 001 and 002), diesel fuel for emergency electricity generation (Tanks J, L, N, S, T, W and X), diesel fuel for use in a fire pump (Tank U), diesel fuel for use in facility vehicles (Tank H), gasoline for use in facility vehicles (Tank G), and used oil (Tank Q). The tanks are registered under the provisions of 6 NYCRR Part 612, "Registration of Petroleum Storage Facilities" and operated under the provisions of 6 NYCRR Part 613, "Handling and Storage of Petroleum", under jurisdiction of the New York State Department of Environmental Conservation (NYSDEC). Any new or substantially modified tanks must be constructed, designed, and installed pursuant to the provisions of 6 NYCRR Part 614, "Standards for New and Substantially Modified Petroleum Storage Facilities."

All bulk storage tanks are regulated by the New York State Department of Environmental Conservation (NYSDEC) under the conditions of Petroleum Bulk Storage Facility Registration No. 3-170534. The facility's current Petroleum Bulk Storage Registration Certificate is provided in Appendix D. A listing of the bulk storage tanks that store petroleum at the facility is as follows:

NYSDEC ID No.	Building No.	Underground/ Aboveground	Construction Material	Product Stored	Tank Capacity (gallons)
001 - 005	Removed				
001	Heating Plant	Underground	Double FRP/Steel	No. 2 Fuel Oil	30,000
002	Heating Plant	Underground	Double FRP/Steel	No. 2 Fuel Oil	30,000
A	Removed				
G	MOC	Underground	FRP	Gasoline	4,000
H	MOC	Underground	FRP	Diesel Fuel	1,000
J	Morris	Aboveground	Coated Steel	Diesel Fuel	150
L	Milne	Aboveground	Coated Steel	Diesel Fuel	147
M	Closed				
N	Alumni	Aboveground	Coated Steel	Diesel Fuel	140
P	Removed				
Q	MOC	Aboveground	Coated Steel	Waste Lube oil	500
R	Removed				
S	Admin	Aboveground	Coated Steel	Diesel Fuel	152
T	Wilsbach	Aboveground	Coated Steel	Diesel Fuel	100
U	Higgins	Aboveground	Coated Steel	Diesel Fuel	150
W	Milne	Aboveground	Coated Steel	Diesel Fuel	500
X	Heat Plant	Aboveground	Coated Steel	#2 Fuel Oil	150

Tanks G and H at the SUCO facility are subject to all of the technical requirements of 40 CFR Part 280. As previously noted these tanks are included (as appropriate) in this SPCC Plan, as required by EPA guidance. This tank is marked on the Figure 2 Area Site Plan in Appendix C.

There are eigh**t** emergency electricity generators at this facility. These generators are located throughout the campus grounds and six of the eight generators are outside. These generators have capacities ranging from 147 to 500 gallons of diesel fuel.

Oil handling/vehicle maintenance operations occur at the SUCO in the Maintenance Center (MOC). These areas store new motor oil and lubricating oil in 55 gallon drums on spill containment pallets. Used oil is stored in a 500 gallon double walled AST (Tank Q).

Oil is transferred to and from the facility's bulk storage tanks and portable containers at the designated tank truck unloading area, and at the nearest paved access for the emergency generator and other tanks.

Possible oil spill events at the SUCO facility are summarized in the following sets of tables. Possible flow rates for delivery truck spills and tank leaks are highly variable and, therefore, are not quantified in these tables. For example, oil spills could be near-instantaneous releases from the vessels, or slow leakage over an extended period of time.

TANKS 001, and 002—Tanks 001 and 002 store No. 2 fuel oil for use in heating and are located at the Heating Plant. These tanks are filled from the designated fill site, and through a pipeline which travels through the heating plant building.

Description of Discharge	Maximum Predicted Spill (gal)	Probable Spill Route
Tank overfill	1	A tank overfill at this location would be prevented by the installed overfill protection valve. The system also has overfill alarm.
Tank leak	0	Tanks are double wall, secondary containment tanks. A tank leak will be detected by the interstitial monitoring system.
Delivery truck spill	9,000	A delivery truck spill in this location would be contained within the delivery truck unloading area. This area is constructed to provide secondary containment capacity for the entire contents of the truck. Drainage from the area is routed to an oil water separator which discharges to a storm sewer that goes to Silver Creek. A valve between the unloading drain and the oil/water separator can be closed to contain any spill within the unloading area

TANKS G and H— These tanks store fuel for use in facility vehicles and are located at the Maintenance Garage. Tank G stores 4,000 gallons of gasoline and tank H stores 1,000 gallons of diesel. These tanks are filled from tank truck delivery.

Description of Spill to Secondary Containment	Maximum Predicted Spill to Secondary Containment (gal)	Probable Spill Route
Delivery truck spill	8,000 (gas) 2,800(diesel)	A delivery truck spill in this location would flow over the concrete and into the storm sewer.
Tank overfill	100	An overfill at these tanks would spill out of the vent pipe and onto the concrete. It would then flow to a nearby storm drain.
NOTE: The largest tank truck expected to deliver petroleum to these tanks is 8,000 gallons. The tank overfill of 100 gal is based on the time it would take for the delivery truck driver to acknowledge the overfill and stop the delivery.		

TANKS J, L, M, N, S, T, U, W and X—These tanks store diesel for emergency power generation and for the Fire Pump (Tank U) and are located around campus.

Description of Discharge	Maximum Predicted Spill (gal)	Probable Spill Route
Delivery truck spill	2,800	A delivery truck spill in this location would spill onto the ground. The nearest storm drain is in nearby street approx. 150ft away.
Tank overfill	5	An overfill at this tank would spill out onto the concrete. Nearest storm drain 150ft away.
Tank leakage	150	This tank has only single wall containment. A leak would spill oil onto the curbed concrete containment area. The nearest storm drain is 150ft away.
Delivery truck spill	2,800	A delivery truck spill would flow over the concrete pad towards Milne library. Nearest storm drain approx. 240ft away.
Tank overfill	5	An overfill would spill onto the concrete pad and flow towards Milne.
Tank leakage	147	A leak would be contained within the double wall containment.
Delivery truck spill	2,800	Delivery truck spill would flow over the concrete pad and then flow past a stone wall to a grassy area and to a storm drain approx. 25ft away.
Tank overfill	5	A tank overfill would flow onto the ground and across the concrete pad to the grassy area and storm drain approx. 25ft away.
Tank leakage	140	Tank leaks would be contained by double wall secondary containment
Delivery truck spill	2,800	Delivery truck spill would flow over the concrete and either under the building (admin) or into a grassy area and to a storm drain 75ft away.
Tank overfill	5	Tank overflow would spill onto the concrete and flow either under the building or onto the grassy area and storm drain 75ft away.
Tank leakage	152	Tank leak would be contained with double wall secondary containment
Delivery truck spill	2,800	Delivery truck spill would flow over concrete and into grass and storm drain 50ft away.
Tank overfill	5	Tank overfill would flow onto the concrete pad and be held by retaining stones/curb. Then down sidewalk to storm drain in grass 50ft away.
Tank leakage	100	This tank has only single wall containment. A leak would spill oil onto the curbed concrete containment area. The nearest storm drain is 50ft away.
Delivery truck spill	2,800	A delivery truck spill would either be contained within the building or would flow to the nearest storm drain to the truck location.
Tank overfill	5	A tank overfill would spill onto the concrete floor and go to the floor drain in the fire pump room.
Tank leakage	150	A tank leak would be contained by double wall secondary containment
Delivery truck spill	2,800	A delivery truck spill would flow over the concrete to asphalt behind Milne library. Nearest storm drain is approx. 240 ft. away.
Tank overfill	10	Tank overfill would spill onto concrete and flow towards Milne Library. Nearest storm drain is approx. 240ft away.
Tank leakage	500	Tank leak would be contained with double wall secondary

Description of Discharge	Maximum Predicted Spill (gal)	Probable Spill Route
		containment.
Delivery truck spill	2,800	A delivery truck spill in this location would spill onto the asphalt. The nearest storm drain is in nearby street approx. 50ft away.
Tank Overfill	5	A tank overfill would spill onto the concrete floor and be contained in room.
Tank leakage	150	Tank leak would be contained with double wall secondary containment.

NOTE: The tank overfill of 5 gal is based on the time it would take for facility personnel to acknowledge t overfill and stop the transfer.

TANKS Q —Tank Q holds waste oil and is located in the maintenance building.

Tank	Description of Discharge	Maximum Predicted Spill (gallons)	Probable Spill Route
Q	Overfill	5	Tank overfill would spill to a gravel area then onto the asphalt pavement and flow downhill to storm drain 240ft away.
	Tank Leakage	500	Tank leak would be contained in the double wall secondary containment.
	Used oil truck spill	500	A truck spill would go to a gravel area then onto the asphalt pavement and flow downhill to storm drain 240ft away.

ELEVATOR RESERVOIRS — Elevator reservoirs are located in the mechanical rooms of every building with more than one floor. The locations (and number of elevators in each) are:

Alumni Field House (1)
Blodgett Hall (1)
Bugbee Hall (1)
Curtis Hall (1)
Fine Arts Center (3)
Ford Hall (1)
Fitzelle (1)
Grant Hall (1)
Hays Hall (1)
Higgins Hall (1)
Hulbert Hall (4)
Human Ecology Building (1)
Hunt Union (2)
Huntington Hall (1)
MacDuff Hall (1)
Matteson Hall (1)
Mills Hall (2)
Morris Hall (1)
Netzer Admin (2)

Physical Science (1)
Schumacher (1)
Wilsbach Hall (2)
Science Building (1)
Sherman Hall (1)

Description of Discharge	Maximum Predicted Spill (gallons)	Probable Spill Route
Elevator Reservoir Failure	55	A tank rupture would release petroleum onto the surrounding concrete floor. The room would contain any spilled material.

COOKING OIL/GREASE — **USED FRYER OIL FROM SEVERAL DINING HALLS IS DRUMMED IN 55-GALLON DRUMS AND STAGED IN THE SERVICE ENTRANCE OF MILLS DINING HALL FOR PICKUP. THE COLLEGE FOOD SERVICE PROVIDER IS RESPONSIBLE FOR OIL/GREASE DISPOSAL (VIA RECYCLING) AND CALLS FOR PICKUP AS NEEDED SO THAT THE NUMBER OF DRUMS ACCUMULATED IS MINIMIZED.**

Description of Discharge	Maximum Predicted Spill (gallons)	Probable Spill Route
Cooking oil/grease drum spill	55	A drum spill would release oil/grease onto the surrounding concrete floor. The room would contain any spilled material.

CONTAINMENT AND/OR DIVERSIONARY STRUCTURES AND/OR EQUIPMENT TO PREVENT A DISCHARGE

Appropriate containment and/or diversionary structures and/or equipment are provided (or are able to be expeditiously provided in the event of an oil release) for the facility's oil storage, handling and transfer areas to prevent a discharge of oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines, as summarized below. [§112.7(c)]

TANKS 001, AND 002 – These tanks are 30,000 gallon No. 2 fuel oil tanks located at the Heating Plant and are referred to as "day" tanks.

The Primary Fill Port for these tanks includes a secondary containment system to prevent uncontrolled release of petroleum. The tank truck unloading area consists of a paved area with valve controller drainage to a 285 gallon oil/water separator that is connected to a storm drain inlet that discharges to the existing storm drainage system. Only clean stormwater is discharged.

All fuel deliveries are fully attended by the driver of the delivery truck. The Heating Plant staff monitors fuel oil deliveries. One maintenance person will be stationed at the fill station for all deliveries. This person will be equipped with a hand-held radio or cell phone. Deliveries will be scheduled by the Heating Plant supervisor to occur Monday through Friday. It shall be the responsibility of heating plant personnel to confirm that sufficient capacity is available in the storage tank to hold the quantity of petroleum product to be delivered. The UST system is equipped with overfill and spill protection.

During tank truck deliveries, a valve between the unloading area drain and the oil/water separator is closed to contain any potential spill. If a spill were to occur, the oil would collect within the drain and paved area and would be removed by vacuum truck or other means. Residual oil remaining after cleanup would be routed to the separator for treatment. To date, there have not been any drips or spills of oil within the tank truck unloading area and no oil has been collected by the oil/water separator. The facility has applied for a general SPDES permit for this discharge.

TANKS G AND H- Tank G is a 4,000 gallon gasoline tank located underground at the maintenance building. Tank H is a 1,000 gallon diesel tank located underground at the maintenance building. Both tanks are equipped with electronic interstitial leak monitoring equipment and double wall secondary containment.

TANKS J, L, N, S, T – Tanks J, and T are single wall above ground tanks within curbed concrete containment areas. Tanks L, N, S, W and X are above ground double wall tanks. All of these tanks are part of emergency electrical generators and are on concrete pads throughout the campus. They contain 100 to 500 gallons of diesel each.

TANK Q – Tank Q is a 500-gal waste oil tank located aboveground at the maintenance center. The tank is made of coated steel and has double wall containment.

TANK U—Tank U is a 150 gallon diesel fuel tank located aboveground in Higgins Hall fire pump room. It is used to power the fire pump there. It is constructed of coated steel and has double wall secondary containment.

Secondary containment dimensions for each of the tanks listed above.

OIL FILLED TRANSFORMERS GREATER THAN 55 GALLONS – The facility has three (3) oil filled single-walled transformers with an oil storage capacity of 55 gallons or greater. The three transformers are part of the substation located near the SUCO Grounds building. Each of these transformers has two reservoirs, one with a capacity of 150gal and the other 1,750gal. The transformers sit in a concrete containment area filled with stone. Any oil leakage from the substation would drain into an oil/water separator, allowing for control, containment and retrieval of the released oil prior to its reaching the facility's property line. Silver Creek is approximately 190 feet to the east of the substation. The location of this transformer, away from the active storm drain system, the design and construction measures, the closed-loop operating status with infrequent loading, the immediate facility response that

will be prompted by an oil release, the monthly visual inspection program provided for the transformers, and the weekly inspection of the oil/water separator, collectively provide sufficient minimum active secondary containment measures for this transformer to prevent an oil discharge, per §112.7(c).

The transformers are designed, constructed and maintained according to specifications for their particular operation and function and their materials of construction are corrosion-resistant. Oil transfers for the transformers occur infrequently, if at all.

The loss of a substantive amount of oil from an individual transformer will result in electrical equipment ceasing to operate, resulting in power outage and thereby resulting in an almost immediate facility response and action. Dedicated, readily-available spill kits are maintained onsite, for immediate use by facility personnel in the event of detection of an oil release from a transformer. Each of the transformers are visually inspected at least monthly for signs of oil seepage or any physical deterioration that may lead to a release of oil (Section 10, below); any observed deficiencies are promptly corrected to prevent conditions conducive to an oil release. The site locations of these individual transformers, their design and construction measures, their closed-loop operating status with infrequent loading, the immediate facility response that will be prompted by an oil release, the monthly visual inspection program provided for the transformers, and the weekly inspection of the oil/water separator, collectively provide sufficient minimum active secondary containment measures for these seven transformers to prevent an oil discharge, per §112.7(c).

Oil-FIRED BOILERS - The facility has five (5) boilers that are operated on natural gas primarily, and for emergency are capable of firing No. 2 fuel oil supplied by the main fuel storage tanks, 001 and 002. The five (5) boilers that remain in operation are located within the heating plant. Boilers 2 and 3 have a capacity for 7000lbs each, boilers 4 and 5 for 50,000lbs each, and boiler 1 for 52,000lbs each. The five (5) boilers are visually inspected monthly for signs of oil seepage or any physical deterioration that may lead to a release of oil (Section 10, below); any observed deficiencies are promptly corrected to prevent conditions conducive to an oil release. In addition, spill kits are provided at the facility and easily accessible. Floor drains in the older side of the Heating Plant drain to a storm sewer. Some, but not all, of these drains have been plugged. Floor drains on the new side of the heating Plant drain into the sanitary sewer. SUCO is planning to install a new floor drain system in the older part of the Heating Plant which will be sufficient to prevent a discharge of oil, per §112.7(c).

ELEVATOR AND VEHICLE LIFT HYDRAULIC RESERVOIRS - The facility's hydraulic oil elevator systems are located fully within the enclosed building interior with no floor drains in the vicinity of these elevators. The capacity of the reservoirs is between 35 and 55gal. These elevators are located in most of the buildings on campus. Each of the elevator systems are maintained and visually inspected monthly by a certified elevator contractor for signs of oil seepage or any physical deterioration that may lead to a release of oil (Section 10, below); any observed deficiencies are promptly corrected to prevent conditions conducive to an oil release. In addition, spill kits are provided at the facility and easily accessible. None of these elevators systems are located in close proximity to floor drains or building sumps that discharge directly to stormwater; rather, the facility's floor drains and building sumps discharge to the combined sewer system that discharges to the local POTW. Accordingly, the building infrastructure for each of the elevator systems provides the requisite diversionary structure for these interior oil-filled operating equipment pieces sufficient to prevent a discharge of oil, per §112.7(c).

OIL-FIRED, OIL-LUBRICATED EMERGENCY ELECTRICAL GENERATORS – The generators are maintained in a non-active standby status; inherently the occurrence and duration of its active status is limited. When the generator is in active use, non-routine conditions are inherently in-place at the facility and the generator provides for critical emergency electrical power. During these conditions the operating generator will receive heightened monitoring and oversight by facility personnel, to ensure proper operation of the generator. In the event of a substantive oil release or leakage from the generator while it is operating, such a release or leakage will most likely result in shutdown of the generator unit, which due to the nature of its intended operation will result in an immediate response by facility personnel. The double walled tanks or secondary containment curbs will directly provide for containment or diversion of the released or spilled oil; spill kits are readily available onsite for immediate use by facility personnel in the event a release of oil from the trailer occurs, prior to the oil reaching the nearest storm water catch basin.

These collective passive diversionary measures (the secondary containment facilities and the distance of the generator installation to the nearest storm drain) and active diversionary measures (routine visual observations, increased monitoring and oversight when operating and the immediate availability of spill kits for direct deployment in the event of a release) provides for sufficient measures to prevent a discharge of oil, per §112.7(c). In the event of an oil release from the generator installation, facility personnel will be able to contain and collect the oil prior to it reaching the nearest storm drain. Each of these generator installations are visually inspected monthly for signs of oil seepage or any physical deterioration that may lead to a release of oil (Section 10, below); any observed deficiencies are promptly corrected to prevent conditions conducive to an oil release.

TANK TRUCK LOADING/UNLOADING AREAS - The facility's designated tank truck loading/unloading areas for tanks G through W are undiked and are located at the nearest paved access to the tanks.

There is a diked tank truck unloading area provided for Tanks 001 and 002, near the heating plant. It has a total capacity sufficient to contain a full tanker truck. An above ground fill cabinet is used to transfer product to a steel pipeline which travels through the plant to the main fuel storage tanks.

VALVES FOR DIKED AREAS

According to 40 CFR Part 112.8(b)(1), the facility must "Restrain drainage from diked storage areas 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. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged. "

Tanks L and T are contained within concrete dikes that have drainage valves. See Section 7.3, Drainage from Diked Areas, below.

MANUAL VALVE OPERATION

According to 40 CFR Part 112.8(b)(2), the facility must "Use valves of manual, open-and-closed design, for the drainage of diked areas."

Drainage valves for containment area are of a manual, open-and-closed design.

DRAINAGE FROM UNDIKED AREAS

According to 40 CFR Part 112.8(b)(3) and 40 CFR 112.12(b)(3), facility drainage systems from undiked areas must flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility.

The facility's outdoor truck loading/unloading areas for Tanks G, H, J, L, N, Q, S, T, W and X are undiked. Drainage from these areas may contact oil that has accumulated or may be present in these areas at the time of precipitation. The potential for oil to accumulate or otherwise be present in these areas will arise only from leakage or spillage occurring during the active truck loading/unloading operation or vehicle refueling. As described in Section 9**,** below, the truck loading/unloading activity is continuously attended and monitored by facility personnel. In the event that oil leakage or spillage occurs during the active transfer operation, facility personnel will immediately implement its oil spill response procedures (Section 13, below). Oil spill booms and/or oil absorbent materials will be used to control the oil and/or drainage that may contact the oil. Secondary containment of the immediate area will be provided by prompt placement of oil spill booms or by implementation of equivalent measures. Oil spill booms or equivalent measures will be used to either directly contain the oil and/or to divert the oil away from local drainage courses and structures. Oil absorbent materials will be used to clean up and remove the released oil. Final cleanup and housekeeping measures will be provided to the extent necessary to ensure that no residual oil remains that could contact and adversely impact subsequent drainage from the area. Information regarding the type and quantity of oil spill booms, oil absorbent materials and other oil spill response materials and equipment is provided in Section 13, below. [§112.8(b)(3) and (4)].

DRAINAGE DIVERSION

There are no outdoor stormwater drainage diversion systems at this facility.

DRAINAGE WATER TREATMENT SYSTEMS

There is one storm water drainage treatment systems located at the transformer pad.

BULK STORAGE CONTAINERS

MATERIAL COMPATIBILITY

According to 40 CFR Part 112.8(c)(1) facilities should "Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature."

All bulk storage tanks at this facility that are directly regulated under 40 CFR Part 112 were designed and constructed to contain or store oil and are compatible with the physical conditions of storage including pressure and temperature. Additionally, all new installations of petroleum storage tanks must be in compliance with the "Standards for New and Substantially Modified Petroleum Storage Facilities" as regulated by 6 NYCRR Part 614.

DIKED AREAS

According to 40 CFR Part 112.8(c)(2), facilities must "Construct all bulk storage container installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil."

All bulk storage tanks at the SUCO facility that are directly regulated under 40 CFR Part 112 are equipped with a means of secondary containment for the entire capacity of the largest single container via double–walled construction, bermed containment area, concrete curbs, or self contained rooms.

Tanks L and T are single wall tanks with concrete dikes as secondary containment. Tanks J, N, S, U, W and X are generator installations and are equipped with double walled tanks. Tanks Q has a secondary containment basin constructed of steel. The remaining tanks at the facility are underground or indoors and are not in dikes subject to precipitation.

DRAINAGE FROM DIKED AREAS

According to 40 CFR Part 112.8(c)(3), the facility should "Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed close. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge describe as defined in 40 CFR 112.1 (b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events."

Tanks L and T are contained within concrete dikes that have drainage valves. Before collected rainwater is released it is visually checked for oil or petroleum sheen on the water surface. The drainage valves are normally closed and locked. The valve is only opened under responsible supervision to drain collected stormwater that is free of oil, then closed and locked following this operation. The bypass valve must never be left unattended when in the open position. In the event an accumulation of oil or an oily sheen is observed in the containment area, the Oil Spill Response Procedures of Section 13 will be followed. Refer to Appendix L for the Record of Containment Area Stormwater Drainage.

The remaining bulk storage tanks at the facility are underground or are not in dikes subject to precipitation.

BURIED METALLIC STORAGE TANKS

According to 40 CFR Part 112.8(c)(4), facilities must "Protect any completely buried metallic storage tank installed on or after January10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions."

There are no completely buried metallic storage tanks at this facility.

PARTIALLY BURIED METALLIC TANKS

According to 40 CFR Part 112.8(c)(5), facilities should "Not use partially buried or bunkered tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions."

There are no partially buried metallic storage tanks at this facility.

ABOVEGROUND STORAGE TANK INTEGRITY TESTING

According to 40 CFR Part 112.8(c)(6), facilities must "Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design…You must keep comparison records and you must also inspect the container's supports and foundations." Per the preamble to the current regulations (67 FR 47120), a visual inspection is sufficient for a shop-fabricated tank that is entirely above the ground and has been inspected monthly, and which internal corrosion poses minimal risk of failure. The industry standard prepared by the Steel Tank Institute (STI) SP001, Standard for Inspection of Aboveground Storage Tanks was used to determine a desirable testing frequency for the aboveground facility tanks as prescribed by EPA.

As detailed in Section 10.2, below, consistent with industry standards and in reliance on the designated routine inspection program, integrity testing (i.e., Formal External Inspection) is required for of the facility's AST's. Reference Section 10.2, below, for additional information.

INTERNAL HEATING COILS

According to 40 CFR Part 112.8(c)(7), facilities must "Control leakage through defective internal heating coils, by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system."

There are no internal heating coils in use.

FAIL-SAFE SYSTEMS

According to 40 CFR Part 112.8 (c)(8), facilities must "Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii) Direct audible or code signal communication between container gauge and the pumping station. (iv) A fast response system for determining the liquid level of each bulk storage container...(v) You must regularly test liquid level sensing devices to ensure proper operation."

Bulk storage tanks at the facility, ~~Tanks 6 and 7~~, Tanks Q, and U are equipped with either high level alarms that are audible and visual at or near the fill port locations or a level gauge visible from the fill port. Underground Tanks G and H have automatic tank gauging systems with high level alarms and electronic continuous monitoring of the interstitial space. Tanks associated with emergency generators, including Tanks J, L, N, S, T, W **and X** are filled via hose equipped with a filling nozzle that requires constant attention. The operator can visually monitor the flow of fuel into the tank to determine when it is near capacity and immediately stops the flow of fuel when the tank is at its working capacity.

PLANT EFFLUENTS

According to 40 CFR Part 112.8 (c)(9), the facility must "Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in 40 CFR Part 112.1(b)."

The facility does not have any plant effluents associated with bulk storage tanks that are discharged into navigable waters.

CORRECTION OF LEAKS

According to 40 CFR Part 112.8 (c)(10), facilities must "Promptly correct visible discharges which result in the loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets and bolts. You must promptly remove any accumulations of oil in diked areas."

Immediately upon discovering a leak or spill of any petroleum product heating plant personnel will take all safe and appropriate measures to stop the flow of the product, and to prevent any product from catching on fire. Secondly, any product that is found outside of the dike areas will be contained in as small an area as possible to promote a quick and efficient cleanup.

MOBILE TANKS

According to 40 CFR Part 112.8 (c)(11), facilities must "Position or locate mobile or portable oil storage containers to prevent a discharge as described in 40 CFR Part 112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation."

The facility does not include any mobile or portable bulk storage tanks.

FACILITY TRANSFER OPERATIONS

BURIED PIPING

According to 40 CFR Part 112.8(d)(1), facilities must "Provide buried piping that is installed or replaced on or after August 16, 2002 with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards…"

All other buried piping was installed before 2002. New piping will be installed to meet the standards.

OUT OF SERVICE PIPELINES

According to 40 CFR Part 112.8(d)(2), facilities must "Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby for an extended period of time."

The pipeline from the filling point near the Heating Plant to the location of former Tank A has been capped and abandoned in place, per proper procedure, as of 2011.

PIPE SUPPORTS

According to 40 CFR Part 112.8(d)(3), facilities must, "Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction."

All aboveground piping is supported by steel pipe supports that allow for expansion and contraction of piping. Pipe supports must be kept painted to minimize corrosion.

INSPECTION OF ABOVEGROUND PIPING

According to 40 CFR Part 112.8(d)(4), facilities must "Regularly inspect all aboveground valves, piping and appurtenances. During inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking valves, and metal surfaces."

All aboveground piping from the oil storage tanks at the facility is visually inspected monthly to assess that the lines are in good operating condition. Inspection records must be maintained by the plant superintendent or designated employee for a minimum of 10 years. See Section 10, below, for more details.

VEHICULAR TRAFFIC

According to 40 CFR Part 112.8(d)(5), facilities must "Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations." All aboveground piping at the facility is located so that it can not be endangered by vehicular traffic.

TANK TRUCK UNLOADING/LOADING

The facility's tank truck loading/unloading procedures meet the minimum requirements of the U.S. Department of Transportation (USDOT) and include, at a minimum, the following standard operating procedures:

- Appropriate facility personnel are notified when a tank truck unloading/loading event will take place, prior to initiation.
- No smoking is allowed during the active tank truck unloading/loading event.
- Tank truck unloading/loading operations are conducted only in areas specifically designated for that purpose.
- Each tank truck unloading/loading event is directly attended and continuously monitored by the truck driver (USDOT carrier) and by an appropriate facility employee. These personnel will take immediate actions to stop the flow of oil when the working capacity of the receiving tank (designated as 90% of the design capacity) has been reached, or in the event that an equipment failure or emergency occurs.
- The truck's manual brake is set throughout the duration of the unloading/loading event. Wheel chocks must be put in place prior to initiation of active unloading or loading, to prevent motion of the truck during the unloading/loading event.
- Prior to filling of any tank truck, the lowermost drain and all outlets of the tank truck are closely inspected for potential for discharge. If necessary, such drains and outlets are tightened, adjusted, or replaced to prevent liquid discharge while in transit.
- A facility employee ensures that drip pans or buckets, or oil absorbent pads are placed beneath all hose connections that may be prone to leakage, prior to initiation of the tank truck unloading/loading event. If appropriate, portable curbing or a mat must be used to isolate the transfer area from any storm drainage structure in the path of a possible spill.
- Unloading or loading does not begin until the level in the receiving tank truck or tank has been checked and confirmed to have sufficient available volume, based on the working capacity of the receiving tank (90% of the design capacity), to receive the volume of oil intended to be transferred.
- Either metallic bonds or ground conductors shall be provided for the neutralization of possible static charges prior to and during transfer of material (49 CFR 177.837).
- Throughout the transfer process, the truck driver and facility employee remain alert and keep an unobstructed view of the truck, delivery hose(s), and storage tank, to the maximum extent practicable. Unless the truck engine is used for operation of the transfer pump, no flammable oil is transferred while the engine is running.
- The drain/transfer valve on the truck/tank is closed and the transfer line is fully drained back to the tank truck or tank (as appropriate), or blown empty, prior to disconnecting the transfer line, except for nozzle-fill transfer hoses that are designed to remain full.
- Prior to departure of the truck, the lowermost drain and all outlets of the tank truck are inspected for the potential for a discharge. If necessary, such drains and outlets are tightened, adjusted, or replaced to prevent liquid discharge while in transit. Also, all wheel chocks are removed.
- The facility will promptly implement appropriate spill response procedures for any leakage or spillage arising from an unloading/loading event.

All fill ports at the SUCO facility have been secured within a fenced area, enclosure, or fitted with a locking cap. Fill port caps are to be opened only when being filled and replaced when filling is complete. Procedures for offloading are posted at the tank truck unloading location.

All fill ports of aboveground and underground bulk storage tanks meet the color coding requirements of 6 NYCRR Part 613.3 (b) as follows:

Tank Identification No.	Product Stored	Color-Code Requirement (to be marked at the fill port)
Tank 001	No. 2 Fuel Oil	Green Hexagon
Tank 002	No. 2 Fuel Oil	Green Hexagon
Tank G	Unleaded Gasoline	White circle with black cross
Tank H	Diesel Fuel	Yellow Hexagon
Tank J	Diesel Fuel	Yellow Hexagon
Tank L	Diesel Fuel	Yellow Hexagon
Tank N	Diesel Fuel	Yellow Hexagon
Tank Q	Waste Lube Oil	NA
Tank S	Diesel Fuel	Yellow Hexagon
Tank T	Diesel Fuel	Yellow Hexagon
Tank U	Diesel Fuel	Yellow Hexagon
Tank W	Diesel Fuel	Yellow Hexagon
Tank X	**#2 Fuel Oil**	**Green Hexagon**

All aboveground storage tanks are labeled with the tank's design capacity, working capacity, and PBS tank identification number.

DRAINAGE

According to 40 CFR Part 112.7(h)(1), "Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility."

The facility does not include any tank truck loading/unloading racks. The facility's designated tank truck loading/unloading areas are undiked except for the fill area Tanks 001 and 002. Section 5, above, summarizes the passive and active containment measures that are/will be provided for the tank truck loading/unloading activity. The use of storm drain inlet covers is also specified for Tank Truck Unloading Areas.

WARNING SIGNS

According to 40 CFR Part 112.7(h)(2), the facility must "Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines."

TRUCK WARNING SIGN

The following Notice is posted at all truck loading/unloading points:

DO NOT PROCEED WITH THE DELIVERY BEFORE CHECKING WITH FACILITY OPERATOR TO CONFIRM THAT THE CAPACITY EXISTS IN THIS TANK TO HOLD YOUR ENTIRE DELIVERY.

THIS DELIVERY IS TO BE CONTINUOUSLY MONITORED BY THE TRANSPORT TRUCK OPERATOR. DELIVERY SHALL BE CEASED IMMEDIATELY IF ANY LEAK OR SPILL OCCURS AND THE INCIDENT SHALL BE REPORTED TO THE MANAGEMENT.

COMPLETELY DRAIN ALL DISCHARGE HOSES, CLOSE AND SECURE ALL VALVES AND CHECK VEHICLE FOR LEAKAGE BEFORE LEAVING THE UNLOADING AREA.

routine visual inspections and maintenance

Employees normally observe aboveground containers and piping each workday. The facility's **SPCC Coordinator** or his designee must conduct a monthly documented visual inspection of the facility's overall oil storage inventory and handling areas, as follows: 1) the facility's aboveground bulk storage tank installations/locations; 2) the facility's underground bulk storage tank installations/locations; and 3) the facility's various oil-filled electrical and operating equipment installations/locations and associated oil management support features, in each case looking for signs of leaks or equipment deterioration that might result in an oil spill and/or discharge. Appendix E contains inspection forms that can be used for completing and documenting each of these three monthly visual inspection components. Any identified deficiency must be promptly reported to the facility Manager of Plant Services and repaired as soon as practicable. Deficient equipment must be drained of oil and taken out of use if necessary to accommodate the required repairs and/or if a release may be imminent. Records must be kept of adequate response measures for all significant deficiencies identified during visual inspections. [§112.7 (e)]

In addition to response measures triggered by monthly visual inspections, corrective action is to be initiated promptly at any time in response to any observed loss of oil from a container, including but not limited to leaks from seams, gaskets, piping, pumps, valves, etc. [§112.8 (c)(10)]

The documented monthly inspections include checking the aboveground bulk oil storage tank level gauges for operability and visually/manually checking the secondary interstitial space (for Tanks L, N, Q, S, U,W **and X**) and the secondary containment dike **(Tanks J and T)** for the presence of oil. [§112.8(c)(8)(v)]

The facility's routine preventive maintenance program for oil-containing equipment includes performing regularly scheduled equipment maintenance, conducting routine inspections, keeping appropriate types of oil spill response equipment and materials, and maintaining good housekeeping.

TESTS

For UST's G, and H daily inventory records must be kept, together with reconciliation of the records on a 10-day basis, in accordance with 6 NYCRR Part 613.4(a) (i.e., daily inventory records for metered tanks). An example UST Daily Inventory Monitoring Form is provided in Appendix F for completion and documentation of this recordkeeping and reconciliation requirement.

The interstitial space of each of the facility's UST's must be monitored/tested weekly for the presence of oil using the continuous interstitial monitoring system, in accordance with 6 NYCRR Parts 613.5(b)(3) and 614.5(b). A form is not provided herein for this purpose rather, the paper printout generated by the monitoring system for this weekly test must be directly maintained for purposes of documentation of completion of this weekly test/inspection. If the monitoring system panel does not have print capability, a weekly written log sheet must be completed to document a weekly check of the interstitial space.

The functionality of the interstitial space monitoring system for each of the facility's UST's must be inspected/tested monthly, in accordance with 6 NYCRR Parts 613.5(b)(3) and 614.5(b). This monthly inspection is to be noted on the monthly UST visual inspection form (Appendix E) and the paper printout generated by the monitoring system for this monthly test must also be directly maintained for purposes of documentation of completion of this monthly test/inspection.

The industry standard prepared by the Steel Tank Institute (STI) SP001, Standard for Inspection of Aboveground Storage Tanks, was used to determine the desirable testing frequency for the facility's AST's (Tanks J **through U**). In accordance with this standard, all AST's are classified as Category 1 tanks, indicating that they have both spill control provisions and Continuous Release Detection Methods. This type of AST requires a periodic visual inspection, which is fulfilled by completion of the monthly AST visual inspection program detailed above, and a more detailed annual visual inspection. Forms are provided in Appendix E for purposes completing and documenting the monthly and annual visual inspection for these AST's.

Tank integrity testing is not required for **Tanks J through U**, in reliance upon the tank construction and completion of the monthly and annual visual inspections. [§112.8(c)(4) and (6)]

RECORDS

The records listed below are maintained for a minimum of three years from the date they are created (or as otherwise specified below) in support of this Plan: [§112.7(e); §112.8(c)(4)]

- Completed records of the weekly test records and monthly visual inspections of the facility's AST and UST's and associated leak detection monitoring systems (keep for 10 years, per 6 NYCRR 613.6(c)).
- Completed records of the monthly visual inspections of the facility's various oil-filled electrical and operating equipment installations/locations and associated oil management support features.
- Daily inventory monitoring for underground storage tanks (keep for 5 years per 6 NYCRR Part 613.4(c)).
- Documentation of major repairs and/or upgrades made to AST's or their appurtenances or secondary containment structures, including in response to deficiencies identified during the monthly visual inspections (best management practice to retain records).
- Reports on any spill incidents (best management practice to retain records).
- Documentation of annual training sessions for all oil handling personnel (keep for at least three years, per 40 CFR 112.7(e)).

SECURITY

The SUCO facility maintenance staffing is limited to the day shift Monday through Friday during the summer and is present more often during the winter/academic year. Campus Security is present and available on campus at all times during the week and do irregular patrols of the campus. The main fuel storage tanks are located underground within the heating plant which is locked when staff is not present. The other emergency generator tanks are located within the locked generator enclosures or fenced enclosures. The gasoline and diesel fuel tanks are located underground. [§112.7(g)(1)]

All valves permitting direct outward flow of oil from a container are kept in the closed position when in non-operating or non-standby status. [§112.7(g)(2)]

The starter controls on all oil pumps are located in areas accessible only to authorized personnel. [§112.7(g)(3)]

All unloading/loading connections are securely capped or blank-flanged when not in service or when in standby service for an extended time, including piping that is emptied of liquid content either by draining or by blowing it empty. [§112.7(g)(4)]

Appropriate lighting is provided to assist in: (1) the discovery of discharges occurring during hours of darkness, both by facility employees, and by others (such as campus security); and (2) the prevention of discharges occurring due to acts of vandalism. [§112.7(g)(5)]

Although the facility's oil storage and handling facilities are not fully fenced, most of the oil facilities are located within secured and monitored buildings. The outdoor UST's and AST's and the emergency generator installations are secured from use by non-facility personnel. The indoor, secure location of the majority of the facility's oil handling facilities, the security lighting provided and the continuous monitoring of the facility by dedicated facility personnel provide for sufficient acceptable security provisions equivalent with the minimum requirements of §112.7(g).

PERSONNEL TRAINING

Facility personnel whose normal duties impact spill prevention equipment are trained in the appropriate procedures to minimize the potential for a release. Personnel are trained to identify deficiencies (through thorough visual inspections) of the pollution control equipment. Personnel are also made aware of the level and type of equipment available to respond to spills. At a minimum, training will include a brief discussion of the following:

- Operation and maintenance of equipment to prevent discharges;
- Discharge procedure protocols;
- Applicable pollution control laws, rules, and regulations;
- General facility operations;
- Content of the SPCC plan; and
- Review of recent reportable spill events and corrective action measures taken

All training sessions are documented, with records retained in support of this SPCC Plan for at least three years. An outline of the typical training provided to such personnel, and an example attendance form are provided in Appendix H.

Individuals responsible for new construction or facility modifications identify spill prevention requirements prior to the approval of new projects, with assistance from environmental, health, and safety personnel.

OIL SPILL RESPONSE PROCEDURES

Quantity	Type of Equipment	General Location
12	"Skum Skimmer"	Heating Plant Loft
1	Recycled Cloth 25lb box	Heating Plant Loft
530	15"x19" oil pads	Heating Plant Loft
28	Blue "sock" 8"dia by 10' length	Heating Plant Loft
70	White "Sock" 4" dia by 10' length	Heating Plant Loft
70	Spill Control Pillows	Heating Plant Loft
1	Spill Berm: 10ft straight section	Heating Plant Loft
2	Spill Berm: 90 degree bend	Heating Plant Loft
11	Oil Dri 40lb bag	Heating Plant Loft
7	Fyber Soak 55lb Container	Heating Plant Loft

Oil Spill Response Procedures [§112.7(d)(1)]

The facility's oil spill response procedures are contained in Appendix I. They are in two stand-alone pages, for ease of reference in the event of an emergency. A list of telephone numbers follows the response procedures. Those numbers are on one stand-alone page, also for ease of reference during an emergency. A form for documenting and reporting oil spills (as required) is provided in Appendix G.

Methods of Disposal of Recovered Materials [§112.7(a)(3)(v)]

As indicated in the facility's Oil Spill Response Procedures (Appendix I), all materials recovered from a spill response will be appropriately containerized and labeled as to contents, date and nature of origination, etc. The facility will make a hazardous waste determination of each such containerized waste, in accordance with applicable federal and/or state regulations for hazardous and otherwise regulated waste. This will include, in part: (1) a review of the waste vis-à-vis listed hazardous wastes; (2) a review of it vis-à-vis the hazardous waste characteristics; (3) a review of it vis-à-vis mixtures of the waste with other hazardous wastes; and (4) knowledge of the waste's characteristics. If a recovered material is determined to be a regulated waste, it will be managed and disposed of in accordance with the appropriate requirements, including the requirements for manifesting if applicable. If a recovered material is determined to be non-regulated, it will be managed as part of the facility's routine solid waste stream.

Spill Incident Reporting [§112.7(a)(4)]

Federal: Federal regulations at 40 CFR §110.3 define a spill as the discharge of oil into, or upon the navigable waters of the United States or adjoining shoreline, in harmful quantities. Harmful quantities are defined as a discharge that violates applicable water quality standards or causes a sheen upon, or discoloration of, the surface water or adjoining shoreline. In the event that such a discharge of oil occurs, the facility's designated **SPCC Coordinator** or their designee is to be notified immediately. That person will then immediately notify the National Response Center (NRC) at 800/424-8802.

Information to be reported includes:

- The name of the person making the report, and his/her job title;
- The name, address and phone number of the facility;

- Time and date of the discharge;
- Type of material discharged;
- Estimates of the total quantity discharged;
- Estimates of the quantity discharged as described in 40 CFR 112.1(b);
- The source of the discharge;
- A description of all affected media (e.g., soil, surface water, ground water);
- The cause of the discharge;
- Any known damages or injuries caused by the discharge;
- Actions being taken to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation has occurred or may be needed; and
- The names of individuals and/or other organizations that have also been contacted.

State: The applicable regulations (6 NYCRR 613.8) state "any person with knowledge of a spill, leak or discharge of petroleum must report the incident to the Department [New York State Department of Environmental Conservation] within two (2) hours of discovery. The results of any inventory record, test or inspection that shows a facility is leaking must be reported to the Department within two (2) hours of the discovery. Notification must be made by calling the telephone hotline." Per 612.1(c)(24), a "spill" or "spillage" "means any escape of petroleum from the ordinary containers employed in the normal course of storage, processing or use", and per 612.1(c)(8) a "discharge" "means any intentional or unintentional or omission resulting in the release, spilling, leaking, pumping, pouring, emitting, emptying or dumping of petroleum into the waters of the state or into waters outside the jurisdiction of the state when damage may result to the lands, waters, natural resources within the jurisdiction of the state, except discharges pursuant to and in compliance with the conditions of a valid state or Federal permit". See 6 NYCRR Part 612.1(c) for additional definitions of terms.

Petroleum spills and discharges must be immediately reported to NYSDEC at 800.457.7362 **unless all** of the following conditions are met:

- The spill is known to be less than 5 gallons,
- The spill is contained and under control of the spiller,
- The spill has not and will not reach water or land, and
- The spill is cleaned up within two (2) hours of discovery.

If ALL of the above conditions are met, the spill does not need to be reported to the NYSDEC. However, it should be documented internally to evaluate the cause and response and to prepare for potential future events. Any "lessons learned" will be added to the facility spill training, documented in Appendix J of the Plan, and the SPCC amended as necessary.

STATE REGULATIONS AND GUIDELINES FOR OIL DISCHARGE PREVENTION AND CONTAINMENT

NEW AND USED OIL

The New York State Petroleum Bulk Storage (PBS) regulations (6 NYCRR Parts 612-614) apply to all aboveground and underground petroleum storage tanks at a facility that has a total storage capacity in tanks of more than eleven hundred (1,100) gallons. Hydraulic system reservoirs and transformers are not considered tanks under these regulations. The New York State Department of Environmental Conservation (NYSDEC) administers the PBS program. Key requirements of that program are summarized below; the regulations must be consulted for more detailed information. [§112.7(j)]

Part 612 - Registration of Petroleum Bulk Storage Facilities

- §612.1(c) provides definitions for the terms used by the PBS program. They clarify, in part, the specific applicability of the overall PBS program to individual facilities.
- §612.2 require registration of petroleum storage facilities, including any out-of-service facilities that have not been permanently closed, with the NYSDEC. New facilities must be registered prior to being placed into service, and the NYSDEC must be notified within thirty days prior to substantially modifying an existing petroleum storage facility. The NYSDEC registration certificate must be displayed on the facility premises at all times.
- §612.5 provides for delegation of the PBS program to certain local governmental agencies upon specific approval by the NYSDEC.

Part 613 - Handling and Storage of Petroleum

- §613.1(g) identifies technical references cited in Part 613.
- §613.2 requires any facility located in a flood plain (as defined by 6 NYCRR Part 500) to be safeguarded against buoyancy and lateral movement by flood waters in accordance with the operating standards set forth in National Fire Protection Association (NFPA) Code No. 30, and in accordance with State and local flood plain regulations. This section also specifies operational standards that must be complied with in the event that tanks are to be ballasted with water during flood plain warning periods.
- §613.3(a) details minimum requirements for facility and carrier personnel for petroleum transfer events, to prevent transfer spills and accidental discharges. [These minimum requirements are incorporated into the facility's Tank Truck Unloading and Loading Procedures]
- §613.3(b) requires permanent marking (color and symbol code) of all tank fill ports to identify the tank product, in accordance with American Petroleum Institute guidelines, as detailed in this section (e.g., a white circle with a black cross for regular unleaded gasoline, a yellow hexagon for diesel fuel, and a green hexagon for fuel oil #2).
- §613.3(c)(1) requires that all dispensers of motor fuel under pressure from a remote pumping system be equipped with a shear valve (impact valve) located in the supply line of the dispenser.
- §613.3(c)(3)(i) requires that all AST's be equipped with a gauge (or equivalent device or system) that accurately shows the level of oil in the tank. That gauge (or equivalent) must be accessible to the carrier and installed such that it can be conveniently read.
- §613.3(c)(3)(ii) requires that the design capacity, working capacity (usually 90% of design), and PBS tank identification number be clearly marked on each AST and at any remote gauge.
- §613.3(c)(3)(iii) A high level warning alarm, a high level liquid pump cutoff controller or equivalent device may be used in lieu of the gauge required above.
- §613.3(c)(4) requires all fill pipes leading to a pump-filled petroleum tank to be equipped with a properly functioning check valve (or equivalent device) that provides automatic backflow protection, if the fill piping arrangement is such that backflow from the receiving tank is possible.
- §613.3(5) require that each tank connection through which oil can normally flow be equipped with an appropriate operating valve to control the flow.

- §613.3(6)(i) and (ii) specify location and capacity thresholds above which an AST must be equipped with a secondary containment system. Minimum design standards for such secondary containment systems are also specified in these sections.
- §613.3(d) specifies that the facility must maintain all gauges, valves and other equipment for spill prevention in good working order.
- §613.4 outlines the requirements for daily inventory monitoring of UST's
- §613.5 (a) outlines the requirements for periodic tightness testing of UST's, including the schedule for initial test, the qualifications of the test technician and the contents of the test report
- §613.6(a) specifies that AST's must be inspected at least monthly, for specified items.
- §613.6(b) outlines requirements for ten-year inspections of specified AST's, including the schedule for the initial ten-year inspection and technical criteria for each ten-year inspection.
- §613.6(c) outlines requirements for keeping the monthly and ten-year inspection reports for at least ten years each, and specifies the minimum inspection information that must be documented.
- §613.6(d) specifies minimum response measures that must be promptly taken in the event that a monthly and/or ten-year inspection of an aboveground tank reveals a deficiency.
- §613.6(e) specifies that if any portion of a facility is not inspected as required, the uninspected portion must be taken out-of-service, in accordance with the requirements of §613.9.
- §613.7 specifies additional testing and inspection requirements when a leak is suspected, or tests or inspections have not been performed, or where accurate inventory records are not kept and reconciled as required in section 613.4.
- §613.8 require any person with knowledge of a spill, leak and discharge of petroleum must report the incident to the Department within two (2) hours of discovery.
- §613.9 details requirements for the closure of out-of-service tanks, including closure of tanks temporarily out-of-service, closure of tanks permanently out of service, reporting to the NYSDEC of out-of-service tanks, and criteria for the reuse of used tanks.

Part 614 - Standards for New and Substantially Modified Petroleum Storage Facilities

- §614.1(a) and (b) note that Part 614 sets forth standards for all petroleum facilities that are new or substantially modified after December 27, 1985.
- §614.1(h) identifies technical references used in Part 614.
- §614.3 details minimum requirements for new UST's, including for labeling, wear plates, and pressure testing, and sets design standards for fiberglass-reinforced-plastic (FRP) tanks, cathodically protected steel tanks, steel tanks clad with FRP, and double-walled tanks.
- §614.4 details minimum standards for secondary containment for UST's.
- §614.5 details monitoring requirements for UST's.
- §614.6 details minimum standards for reconditioning a UST.
- §614.7 outline requirements for installation of underground facilities.
- §614.9 details design standards for new AST's.
- §614.10 details requirements for impermeable barriers under AST tank bottoms.
- §614.11 specify requirements for monitoring systems for new AST's.
- §614.12 outline requirements for repairing and reconditioning AST's.
- §614.13 details requirements for installation of new aboveground facilities.
- §614.14 specifics requirements for new underground piping systems.

The facility conforms with these requirements. In particular, all of the underground storage tanks at this facility meet the requirements of §614.3. These tanks and their remote fill ports are labeled with the following information:

Label Information

- Manufacturer statement that the tank conforms to 6 NYCRR Part 614
- Standard of design by which the tank was manufactured
- Petroleum products and percent of volume of additives that may be stored permanently and compatibly within the tank (or a reference list)

- Year the tank was manufactured
- Unique identification number
- Dimensions of the tank plus the design capacity, working capacity, and model number
- Name of the manufacturer
- Tank installation date.

Remote Fill Port Location (must be readily visible to the delivery driver)

All the same information required to be on the tank, plus the tanks' installation date

Used Oil

6 NYCRR Subpart 374-2: Standards for the Management of Used Oil apply, in part, to generators of used oil and these regulations address management of used oil primarily in the context of recycling and disposal of used oil.

Pertinent excerpts from Subpart 374-2 that may apply to the facility include the following:

- §374-2.1 provides definitions for management of used oil under this Subpart, including definitions for "used oil" and related terms.
- §374-2.2 outlines the overall applicability of Subpart 374-2.
- §374-2.3 outlines standards for used oil generators. §374-2.3(a) outlines the applicability of Subsection §374-2.3. §374-2.3(c) outlines used oil storage requirements. §374-2.3(d) outlines requirements for burning used oil in onsite space heaters.
- §374-2.3(c)(8) requires that containers and aboveground used oil tanks and fill pipes used to transfer used oil into underground used oil tanks must be labeled with the words "Used Oil".

The facility conforms to these requirements.

AMENDMENT OF SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN BY REGIONAL ADMINISTRATOR

A written report shall be submitted to the EPA Administrator, Region 4, within 60 days of a discharge of more than 1,000 gallons of petroleum into or upon the navigable waters of the United States or adjoining shorelines in a single spill event or discharges of more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines within any twelve month period. If such an incident should occur, the report must include the following information:

1. Facility name
2. Name of the facility personnel providing this information
3. Facility location
4. Maximum storage and handling capacity and normal daily throughput
5. Corrective actions and countermeasures that have been taken by the facility, including a description of equipment repairs and replacements
6. Detailed description of the facility, including maps flow diagrams, and topographical maps, as necessary
7. The cause of such discharge(s), including a failure analysis of the system or subsystem in which the failure occurred
8. Additional preventive measures that the facility has taken or contemplated to minimize the possibility of recurrence
9. Other pertinent information as required by the Regional Administrator.

A copy of this report must also be sent to the New York State Department of Environmental Conservation (NYSDEC) for review and to provide them with the opportunity to make further recommendations.

Following review of the SPCC Plan by the Regional Administrator due to the report of a discharge as described above, the Regional Administrator may require the facility to amend the SPCC Plan if the Plan does not meet the requirements set forth by 40 CFR Part 112, or if the SPCC Plan is deemed to be insufficient for the purposes of prevention and control of discharges at the facility.

EMERGENCY RESPONSE PLAN

Environmental Health and Safety

Contingency Plan for Natural Gas/Propane Leaks

SECTION 8 Appendix 6

Updated: 03/2009 12/2013
03/2010
03/2012

NATURAL GAS/PROPANE LEAK

If the odor of gas has been detected or if you have reason to believe that a gas leak has occurred, the take the following actions:

1. Eliminate flames, heat sources and spark-producing devices.
2. Notify University Police at 436-3550.
3. Notify MOC at 436-2507.
4. If MOC is unable to address the problem, notify Oneonta Fire Department at 433-3480. Request that they respond to the scene with their gas detector.
5. Upon request of MOC or Oneonta Fire Department, notify NYSEG at 1-800-572-1121 and request that they respond.
6. Restrict traffic.
7. Open windows.
8. Adjust ventilation as required.

The following buildings are supplied with propane: (heavier than air will pool in low lying areas)

Building	Tank Location
Fine Arts	North service dock
Morris Conference Center	Rear of building
Science I	Rear loading dock
Physical Science	Ravine Parkway masonry structure

The following buildings are supplied with natural gas (natural gas is lighter than air and will seek higher area), which is supplied via underground piping:

Hunt Union
Heating Plant
MOC
Field House
Fitzelle Hall
Bugbee School
Human Ecology

The following building's boilers are supplied by natural gas with backup propane tanks:

Building	Propane Tank Location
Hunt Union	Rear of building
Fitzelle	NE corner of building adjacent to West Dorm Drive

See attachment 1 for Shut off valves

Attachment 1

NATURAL / L.P. GAS STATIONS (01/2009)

BUILDING #	NAME	LOCATION	TYPE
2	BUGBEE	NORTHEAST	NATURAL
4	SCIENCE 1	NORTH	NATURAL
8	HUMAN ECOLOGY	NORTHWEST	NATURAL
10	HEATING PLANT	WEST	NATURAL
11	MORRIS	EAST	L.P.
17	MILLS	NORTHEAST	NATURAL
23	FINE ARTS	NORTHWEST	NATURAL
25	SCIENCE 11	WEST	L.P.
26	FITZELLE	NORTHEAST	L.P./NATURAL
27	MAINTENANCE	NORTH	NATURAL
28	HEALTH WELLNESS	WEST	NATURAL
33	WILSBACH	NORTH	NATURAL
37	HUNT UNION	NORTH	L.P./NATURAL
41	HULBERT	WEST	NATURAL
39	HIGGINS	NORTH	NATURAL
98	FIELD HOUSE	SOUTH	NATURAL

- **ALL LOCATIONS ARE OUTSIDE OF BUILDINGS (EXTERIOR).**

Environmental Health and Safety

Generic Site Safety Plan

SECTION 8 Appendix 7

Updated: 03/2009 12/2013
03/2010
03/2012

Generic Site Safety Plan

The following pages present a generic site safety plan provided by the U.S. Coast Guard's *Policy Guidance for Response to Hazardous Chemical Releases,* USCG Pollution Response COMDTINST-M16465.30. Pages included are:

II-6-10
II-6-11
II-6-12
II-6-13
II-6-14
II-6-15
II-6-16

Generic Site Safety Plan

This appendix provides a generic plan based on a plan developed by the U.S. Coast Guard for responding to hazardous chemical releases.* This generic plan can be adapted for designing a Site Safety Plan for hazardous waste site cleanup operations. It is not all-inclusive and should only be used as a guide, **not a standard.**

A. SITE DESCRIPTION

Date_____Location_____
Hazards_____
Area affected_____
_____
Surrounding population_____
Topography_____
Weather Conditions _____
_____
_____
Additional information_____
_____
_____

B. ENTRY OBJECTIVES - The objective of the initial entry to the contaminated area is to **(describe actions, tasks to be accomplished; i.e., identify contaminated soil; monitor conditions, etc.)**

_____
_____
_____

C. ONSITE ORGANIZATION AND COORDINATION - The following personnel are designated to carry out the stated job functions on site. (Note: One person may carry out more than one job function.)

INCIDENT COMMANDER_____
SCIENTIFIC ADVISOR_____
SAFETY OFFICER_____
PUBLIC INFORMATION OFFICER_____
LIASON OFFICER_____
RECORDKEEPER_____
HAZ-MAT TEAM LEADER_____
HAZ-MAT TEAM MEMBERS_____
_____
_____
_____

***U.S. Coast Guard Policy Guidance for Response to Hazardous Chemical Releases. USCG Pollution Response COMDTINST-M16465.30.**

FEDERAL AGENCY REPS (i.e., EPA, NIOSH)_____

_____

_____

_____

STATE AGENCY REPS

_____

_____

_____

_____

LOCAL AGENCY REPS _____

_____

_____

_____

_____

CONTRACTOR(S) _____

_____

_____

_____

_____

All personnel arriving or departing the site should log in and out with the Recordkeeper. All activities on site must be cleared through the Incident Commander.

D. ONSITE CONTROL

(Name of individual or agency) has been designated to coordinate access control and security on site. A safe perimeter has been established at **(distance or description of controlled area**)

_____

_____

_____

No unauthorized person should be within this area.

The onsite Command Post and staging area have been established at _____

_____

_____

_____

_____

The prevailing wind conditions are _____. This location is upwind from the Hot Zone.

Control boundaries have been established, and the Hot Zone (the contaminated area) hotline, Warm Zone, and Cold Zone have been identified and designated as follows: (describe boundaries and/or attach map of controlled area) _____

_____

_____

_____

_____

These boundaries are identified by: (marking of zones, i.e., boundary tape-hotline; traffic cones-Cold Zone; etc.) _____
_____
_____
_____

E. HAZARD EVALUATION

The following substance(s) are known or suspected to be on site. The primary hazards of each are identified.

Substance Involved (Chemical name)

_____

_____

_____

Concentration/Quantity

_____

_____

_____

Primary Hazards (e.g., toxic on inhalation)

_____

_____

_____

The following additional hazards are expected on site: (i.e., slippery ground, uneven terrain, etc.) Hazardous substance information form(s) for the involved substance(s) have been completed and are attached.

F. PERSONAL PROTECTIVE EQUIPMENT

Based on evaluation of potential hazards, the following levels of personal protection have been designated for the applicable work areas or tasks:

Location	**Job Function**	**Level of Protection**
Hot Zone	_____	A B C D Other
	_____	A B C D Other
	_____	A B C D Other
	_____	A B C D Other
Warm	_____	A B C D Other
Zone	_____	A B C D Other
	_____	A B C D Other

Specific protective equipment for each level of protection is as follows:

Level A
Fully-encapsulating suit SCBA
(disposable coveralls)

_____
_____
_____
_____
_____

Level C
Splash gear (type)
Full-face canister resp.

_____
_____
_____
_____
_____

Level B
Splash gear (type)
SCBA

_____
_____
_____
_____
_____

Level D

_____
_____
_____
_____
_____

Other

The following protective clothing materials are required for the involved substances:

Substance (Chemical Name)	**Material** (Material Name, e.g., Viton)

NO CHANGES TO THE SPECIFIED LEVELS OF PROTECTION SHALL BE MADE WITHOUT THE APPOVAL OF THE SAFETY OFFICER AND THE INCIDENT COMMANDER.

G. LOCAL EMERGENCY RESPONSE PLANS

Emergency Response Teams consisting of_____ persons will perform the following tasks:

Incident Commander (name)	Function
_____	_____
_____	_____
_____	_____
Operational Team_____	_____
_____	_____
_____	_____
_____	_____
Haz-Mat Team_____	_____
_____	_____
_____	_____
_____	_____
Backup Team_____	_____
_____	_____
_____	_____
_____	_____
Decontamination Team_____	_____
_____	_____
_____	_____
_____	_____

The Teams were briefed on the contents of this plan at (time)_____.

H. COMMUNICATION PROCEDURES

Channel_____has been designated as the radio frequency for personnel in the Hot Zone. All other onsite communications will use channel_____.

Personnel in the Hot Zone should remain in constant radio communication or within sight of the Incident Commander. Any failure of radio communication requires an evaluation of whether personnel should leave the Hot Zone.

(Horn blast, siren, etc.)_____is the emergency signal to indicate that all personnel should leave the Hot Zone. In addition, a loud hailer is available if required.

The following standard hand signals will be used in case of failure of radio communications:

1.	Hand gripping throat	Out of air, can't breathe
2.	Grip partner's wrist or both hands around waist	Leave area immediately
3.	Hands on top of head …	Need assistance
4.	Thumbs up	OK, I am all right, I understand
5.	Thumbs down…	No, negative

Telephone communication to the Command Post should be established as soon as practicable. The phone number is_____.

I. DECONTAMINATION PROCEDURES

Personnel and equipment leaving the Hot Zone shall be thoroughly decontaminated. The level decontamination protocol shall be used with the following decontamination stations:

(1)_____ (2)_____ (3)_____ (4)_____
(5) _____ (6)_____ (7)_____ (8)_____
(9) _____ (10)_____ Other_____

Emergency decontamination will include the following stations:

_____
_____
_____

The following decontamination equipment is required:_____
_____
_____
_____

(Normally detergent and water)_____ will be used as the decontamination solution.

J. SAFETY AND HEALTH PLAN

1. (Name)_____is designated Safety Officer and is directly responsible to the Incident Commander for safety recommendations on site.

2. Emergency Medical Care
(Names of qualified personnel)_____
are the qualified EMTs on site.
(Medical facility names)_____
at (address)_____
phone _____is located _____minutes from this location.
(name of person)_____
was contacted at (time)_____and briefed on the situation, the potential hazards, and the substances involved. A map of alternative routes to this facility is available at (normally Command Post)_____.

Local ambulance service is available from _____at phone _____. Their response time is _____minutes. Arrangements must be made for onsite standby of EMS.

First-aid equipment is available on site at the following locations:

First-aid kit _____
Emergency eye wash _____
Emergency shower _____
(Other) _____

Emergency medical information must be given to EMS for substances present:

Substance	Exposure Symptoms	First-aid Instructions

List of emergency phone numbers:

Agency/Facility	Phone number	Contact
Police		
Fire		
Hospital		
Airport		
Public Health Advisor		

3. Environmental Monitoring
   The following environmental monitoring instruments shall be used on site (cross out if not applicable) at the specific intervals.

		Results
Combustible Gas Indicator	-continuous/hourly/daily/other	
Oxygen Monitor	-continuous/hourly/daily/other	
Colorimetric Tubes	-continuous/hourly/daily/other	
(Type)		
HNU/OVA	-continuous/hourly/daily/other	
Other	-continuous/hourly/daily/other	
	-continuous/hourly/daily/other	

ADDITIONAL INCIDENT CONTROL MEASURES (IF ANTHRAX IS SUSPECTED AGENT):

PROTECTION LEVELS

- Protection from anthrax can be obtained by wearing Level C (ex. Tyvek), or splash protection, rubber gloves, and a full face high efficiency particulate air filter (HEPA) (Level C), or a self contained breathing apparatus.

DETERMINE AND ESTABLISH PROPER DECONTAMINATION PROCEDURES

- Refer to attached DOH Decontamination Protocols.
- Prepare necessary decon plan.
- Put necessary decon equipment in place prior to entry.

DETERMINE EXTENT OF ACTIVITY OF ENTRY TEAM

Possible actions include:

- Removal of exposed personnel
- Decontamination of exposed personnel.
- Sample collection
- Evidence collection
- Product containment
- Area decontamination.

ENTRY CONSIDERATIONS

- Entry team actions should not worsen the potential for product spread. Since material is spread by air currents, material carried on clothing or stuck to items, it is critical to minimize the affected area.
- Once in hot zone, close doors, windows, or other opening that may allow material to spread through the area. Wetting the suspect material may reduce the potential for the material to become airborne.
- Assess medical condition of exposed persons to determine critical emergency care needs.
- Provide status report to Command Post.
- Utilize on-site testing equipment (Smart Tickets, etc), if available to attempt to determine if material is anthrax. Use of such devices should be considered as an initial test indicator, follow up laboratory analysis is still necessary. Additionally, these initial test results should be provided to the laboratory that will be performing the follow up testing.
- Conduct predetermined activities
    - Decontamination of exposed persons
    - Sample collection (per attached protocol)
    - Evidence collection
    - Product containment
    - Area decontamination (per attached protocol)
- Secure the area, secure the evidence, decontaminate the responders who operated in the affected area and exit the affected area.

DECONTAMINATION CONSIDERATIONS

- Determine best location to conduct decontamination and set up equipment (use of existing wash facilities should be considered for initial decon)
- Conduct decon procedures in accordance with attached DOH protocols. Anthrax, unless suspended in air, presents a fairly limited contamination hazard.
- Water used for decontamination does not need to be contained.
- Decon equipment by using soap and water. A solution of 1:10 dilution of household bleach and water should be used only if there is a confirmation of the agent and an inability to remove materials through soap and water decontamination.

MEDICAL EVALUATION OF EXPOSED PERSONS (SEE DECONTAMINATION ADVISORY)

- Consult City, County or State Health Departments for additional information regarding the need for immediate evaluation of exposed persons if the FBI or State Police consider this a credible threat and have authorized laboratory testing. Self monitoring of symptoms may be all that is required.
- Exposure to an unknown powder does not warrant transportation to a health care facility. If exposed persons exhibit symptoms that warrant transport to a medical facility (chest pains, anxiety, etc.), they should be decontaminated per protocol and EMS personnel should utilize universal precautions during such transport.

SITE SECURITY

- Decon the area impacted per protocol or secure it from further entry until removed samples are evaluated and tested. Law enforcement may also desire to protect the area and treat as a crime scene.
- Secure all primary decontamination equipment and potentially contaminated equipment until testing is complete.

INCIDENT TERMINATION

- Inform all personnel associated with the incident of the typical symptoms from an exposure to anthrax. The attached medical information should be provided to such persons

ATTACHMENTS

Department of Health Criteria for Wadsworth Laboratory testing for Anthrax of Environmental Specimens
Department of Health Protocol for Submitting Environmental Material
Department of Health Suggested Protocols for Decontamination during Suspected Anthrax Incidents
Patient Self Monitoring Instructions

CALL TAKER PROCEDURES, BIOLOGICAL INCIDENT

Inform caller to remain calm, the probability is that this threat is a hoax. If the material does turn out to be anthrax or biological in nature, appropriate medical treatments are available.

What type of package or hazard is involved?_____
_____
_____

What is the current location of the package and/or material?_____
_____

How was it delivered?_____

How many people are known to have handled the item?_____

Has the item been opened?_____

If not, what makes it suspicious?_____

If suspicious item is unopened and suspicious or threatening markings do exist, advise the caller not to open the item. Law enforcement should be dispatched to collect the suspect item.

If no suspicious marking exists, the hazard potential is extremely low, advise caller that if concerned, they should not open the item, but place it in a plastic bag and dispose of it in the trash. They can then wash with soap and water.

If the suspicious item has been opened:

Are there any suspicious or threatening statements included (outside and inside)?_____

Is there any unusual material included with the item?_____

Describe the unusual material_____
_____

Has any of the unusual material been released from the package?_____

How many people are known or believed to have had direct contact with the material or by-products suspended in air)_____

Is anyone experiencing health problems?_____

Describe the symptoms_____
_____

Dispatch appropriate health care, advise them of the situation so they can exercise appropriate caution.

If a suspicious item is opened and it contains threatening markings or material, such as powder or liquids, the caller should be advised to not touch the item or the material further. Advise the caller to keep their hands away from their face and not touch their eyes, nose or mouth.

Do you have access to water?_____ If material is spilled and water is available, advise the caller to cover the material with a wet paper towel or cloth.

Is there a telephone in a nearby room that you have access to?_____

What is the phone number there?_____

If the caller has access to a phone that is remote from the material, advise them to move into the nearby room and that you will call them at that number. If they do not know the number, advise them to call you when they reach the other phone. Advise the caller to gently close the door to the room as they leave. If possible, the caller should close all windows and doors and shut down heating and air conditioning systems. **Caller must be told to remain on the scene, but outside the affected area until the responders arrive.**

Dispatch the appropriate resources, relay the information you have collected and maintain phone contact with the caller until they arrive.

PROTOCOL FOR SUBMITTING ENVIRONMENTAL SAMPLES FOR LABORATORY TESTING
(Dry material only)

PACKAGING MATERIAL NEEDED

Three zip lock bags per specimen

Biohazard label

Chain of Custody Form

One gallon paint can with lid, or a small plastic container with a secure lid

PROCEDURE FOR PACKAGING

With the appropriate precautions, place the suspected environmental material in the zip lock bag and seal **completely**.

Place the zip lock-sealed envelope in a 2nd zip lock bag and seal **completely**

Place the double sealed zip lock in a 3rd zip lock bag and seal **completely**

Affix a Biohazard tape on the outer zip lock bag

Place the triple bagged sample into the airtight container and seal container **firmly**

Affix a Biohazard label on the outer seal

Fill the chain of custody form and place around the container with a rubber band

Place the container in a plastic bag and seal

Affix on the outer plastic bag a Biohazard label

SAMPLE SIZE/NUMBER

A single sample per incident is adequate

Minimal amount of material is necessary—no more than a few ounces; in the case of a letter or envelope, package the whole item

RESPONSIBILITY FOR TRANSPORT

Local law enforcement is responsible to arrange for specimen transport

CRITERIA FOR WADSWORTH TESTINGFOR ANTHRAX OF ENVIRONMENTAL SPECIMENS

October 16, 2001

A) Situations in which there is not human illness:

1) Is there a plausible threat?*

YES_____ NO_____

*A plausible threat includes an explicit verbal or written threat.
or
similar suspicious circumstances, that the FBI considers serious enough to conduct a criminal investigation.

2) Is there powder/substance available for testing?

YES_____ NO_____

3) Was there a person or persons in direct contact with powder/substance (e.g., "direct" contact means skin contact with the powder, exposure to inhaled powder, etc.)?

WADSWORTH WILL TEST SPECIMENS MEETING ALL THREE OF THE ABOVE CRITERIA, AS WELL AS THOSE THAT MEET ONE AND TWO AND ARE DETERMINED HIGH RISK BY THE FBI/STATE POLICE.

B) Situations in which there is human illness:

1) Is there a person who has illness consistent with anthrax and who had contact with a suspicious material?

YES_____ NO_____

2) Is the suspicious material available for testing?

YES_____ NO_____

IF "YES" TO BOTH QUESTIONS, THEN SPECIMEN WILL BE TESTED AT WADSWORTH LAB.

WADSWORTH LAB WIL NOT ACCEPT ANY SPECIMEN UNTIL THE FBI (OR STATE POLICE LAB) HAS CALLED THE NEW YORK STATE DEPARTMENT OF HEALTH TO AUTHORIZE TESTING. SPECIMENS WILL BE ACCEPTED 7 AM TO 6 PM FOR LABORATORY ACCESSIONING, WEEKDAYS.
ON WEEKENDS, SPECIMENS MAY BE ACCEPTED ONLY BY SPECIAL ARRANGEMENT.