


Spill Prevention, Control, and Countermeasure Plan




	Texas A&M University-Texarkana		
	Spill Prevention, Control & Countermeasure Plan	Program:	Environmental Management
		Doc. No.:	ENVM-22-L2-S14-CH4-001
		Rev No:	003
	Level 2	Date:	01/05/2023
Office:		Environmental, Health & Safety	


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Concurrence and Approval

DocuSigned by:

 Heather Vogt, EHS Manager
 1/5/2023
 Date


DocuSigned by:

 Jeff Hinton, CFO & Vice President for Finance and Administration
 1/5/2023
 Date

DocuSigned by:

 Dr. Emily Cutrer, President
 1/24/2023
 Date

Certification (if required by law or regulation)

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

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


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Change History

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


Revision Number	Interim Change No.	Effective Date	Description of Change
000	0	07/30/2014	Initial plan.
001	0	01/10/2017	Major revisions. Updated facility description and contact list. Migrated to standard A&M System ENVM format.
001	1-a	01/12/2018	Annual Review
002	0	02/19/2019	Added 2 elevators, 2 transformers, and 1 emergency generator to the plan.
003	0	01/05/2023	Annual Review and change of personnel

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Section 1. Tier I Qualified Facility SPCC Plan – Introduction


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

- (1) No individual aboveground oil storage container is larger than 5,000 gallons, with the largest being 500 gallons; and
- (2) There have been no Clean Water Act-reportable discharges of oil, and the aggregate aboveground oil storage capacity (3,692 gallons) is 10,000 U.S. gallons or less.

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

Facility Description

Facility Name	<u>Texas A&M University-Texarkana</u>		
Facility Address	<u>7101 University Ave.</u>		
City	<u>Texarkana</u>	State	<u>TX</u> ZIP <u>75503</u>
County	<u>Bowie</u>	Tel. Number	<u>903-334-6794</u>
Owner or Operator Name	<u>An agency of the State of Texas, under The Texas A&M University System</u>		
Owner or Operator Address	<u>7101 University Ave.</u>		
City	<u>Texarkana</u>	State	<u>TX</u> ZIP <u>75503</u>
County	<u>Bowie</u>	Tel. Number	<u>903-334-6794</u>

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

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


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

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

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

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

Signature <u>Heather Vogt</u> <small>C8CEF0355E54491...</small> Name <u>Heather Vogt</u>	Title: <u>EHS Manager</u> Date: <u>1/5/2023</u>
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Section 3. Record of Plan Review and Amendments

Five Year Review (§112.5(b))

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

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))

This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	<input checked="" type="checkbox"/>
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. [§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	<input checked="" type="checkbox"/>

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Section 4. Plan Requirements

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


Table G-2 Oil Storage Containers and Capacities

<p>This table includes a complete list of all oil storage containers (aboveground containers ^a and completely buried tanks [Note: There are no buried tanks]^b) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers [Note: There are no mobile/portable containers], an estimated number of containers, types of oil, and anticipated capacities are provided.</p>			☒
Oil Storage Container (aboveground (A) or completely buried (B))	Type of Oil	Shell Capacity (gallons)	
(A) Generator (EMGT-01)	Diesel	472	
(A) Generator (EMGT-02)	Diesel	200	
(A) Generator (EMGT-03)	Diesel	450	
(A) Generator (EMGT-04)	Diesel	133	
(A) Transformer (TR-01)	Mineral oil	363	
(A) Transformer (TR-02)	Mineral oil	314	
(A) Transformer (TR-03)	Mineral oil	470	
(A) Transformer (TR-04)	Mineral oil	470	
(A) Transformer (TR-05)	Mineral oil	419	
(A) Transformer (TR-06)	Mineral oil	211	
(A) Transformer (TR-07)	Mineral oil	248	
(A) Cooking Oil Tank (CO-01)	Vegetable oil	100	
(A) Elevator (ELEV-01)	Hydraulic oil	119	
(A) Elevator (ELEV-02)	Hydraulic oil	93	
(A) Elevator (ELEV-03)	Hydraulic oil	143	
(A) Elevator (ELEV-04)	Hydraulic oil	157	
Total Aboveground Storage Capacity (gallons) ^c		4362	
Total Completely Buried Storage Capacity (gallons)		0	
Facility Total Oil Storage Capacity (gallons)		4362	

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

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

^C Counts toward qualified facility applicability threshold.

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

Table G-3 Secondary Containment and Oil Spill Control

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

☒

Bulk Storage Containers

Description

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

- Generator sets are manufactured by Kohler Power Systems, powered by John Deere diesel engines conforming to EPA Tier 3 nonroad emissions regulations. The above-ground rectangular secondary containment tanks mount directly to the generator sets, below the generator set skids (subbase).
- The secondary-containment generator-set base tanks are manufactured by Global Power Components.
- To ensure cold-weather operations, generator-set batteries are equipped with automatic temperature compensation over the ambient temperature range of -40°C to 60°C (-40°F to 140°F).
- Both the inner and outer tanks have emergency relief vents.
- Inner tanks are equipped with low-fuel and high-fuel alarm float switches.
- Inner tanks have overflow prevention valves.

Emergency Generator Tank Release Discovery and Reporting

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

However, should a leak occur between regular inspection dates, campus faculty, staff or students who observe a problem may report it directly via 911 or, for non-emergencies, to the Environmental, Health & Safety Manager or Facilities Management.

Fuel Transfer Procedures & Spill Response


Even though the tanks are equipped with overflow prevention, release scenarios suggest that a spill, however unlikely, may occur due to container overflow or fill line rupture. Any such spill is likely to be less than five gallons and should not threaten navigable waters. EMGT-01 and -02 are located inside a graveled, curbed area, so a small spill cannot escape to surface water, while EMGT-03 and -04 are located on a grassy area far from surface water. Facility staff or contractors who maintain and refuel or top-off generators are:

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

Oil-Filled Operational Equipment

Description

Seven pad-mounted medium-voltage 3-phase transformers supply the campus buildings with power. These units are naturally cooled with high fire point (i.e., >300°C) mineral oil. Transformers are single walled of steel construction with stainless steel bases, painted green with two coats of urethane finish to inhibit corrosion, and equipped with pressure

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vacuum gauges with alarms, oil level gauges with alarms, and drain valves with oil sampler ports. Drain valves are inside of locked, high-security protective cabinets.

Five of the transformers are considered elevated tanks on grills, gratings, or supports and have sized secondary containment. Two units (TR-05 at the NW corner of Bringle Lake Village and TR-06 at the SE corner of the Student Center) have a single-walled tank and do not have sized or general secondary containment, as allowed for **Qualified Oil-filled Operational Equipment** under 40 CFR §112.7(k). The facility has had no Clean Water Act (CWA)-reportable discharges and so qualifies for paragraph (k).

Therefore, as required by paragraph (k), transformers TR-05 and -06 are covered by an **Oil Spill Contingency Plan** and a **Written Commitment of Manpower, Equipment and Materials**, provided in **ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist**. The contingency plan would be activated in the event of a state-reportable or federal CWA-reportable discharge to navigable waters.


Transformer Release Discovery and Reporting

Transformer leaks are extremely uncommon. Failures are most frequent when transformers are new and have inherent manufacturing flaws or when they are nearing the end of their operating lives (typically 20+ years, usually much longer) due to deterioration. Slow, minor leaks are rare and are easily observed during frequent inspections. Major, catastrophic leaks are always manifest immediately, because a major failure also kills power to the building and often includes arcing, fire and/or explosion. For example, catastrophic failure of a 1,500 KVA transformer would likely result in a flowing stream of flaming transformer oil.

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

However, should a leak occur between regular inspection dates, campus faculty, staff or students who observe a problem may report it directly via 911 or using a campus non-emergency number.

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


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Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided. Locations are shown on the Facility Diagram (Attachment 5).

Table G-4 Containers with Potential for an Oil Release or Reportable Discharge

Area	Type of failure (discharge scenario)	Potential release vol. (gal)	Release flow direction	Secondary containment method ^a	Secondary containment capacity(gal)
Bulk Storage Containers and Mobile/Portable Containers (e.g., fuel tanks; drums)^b					
EMGT-01: Back-up generator fuel tank (Science & Technology)	Container rupture (strike by vehicle)	472	West to on-campus pond.	Secondary containment storage tank	>472
	Container overflow (operator error)	2			
EMGT-03: Back-up generator fuel tank (University Center)	Container rupture (strike by vehicle)	450	225 feet North, 1750 feet East towards creek bed	Secondary containment storage tank	>450
	Container overflow (operator error)	2			
EMGT-02: Back-up generator fuel tank (Central Plant)	Container rupture (strike by vehicle)	200	50 feet North, 1750 feet East towards creek bed	Secondary containment storage tank	>200
	Container overflow (operator error)	2			
EMGT-04: Back-up generator fuel tank (Building for Academic & Student Services)	Container rupture (strike by vehicle)	133	West to on-campus pond.	Active control/sorbents	N/A
	Container overflow (operator error)	2			
CO-01: Used cooking oil tank (University Center)	Container rupture	100	West to on-campus pond.	Active control/sorbents	N/A
	Container overflow (operator error)	2			
Oil-filled Operational Equipment (e.g., hydraulic equipment; transformers; switches; elevators)^c					
TR-01: Electrical Transformer (Science & Technology)	Container rupture (internal arc)	363	West to on-campus pond.	Cement moat sized secondary containment with closeable valve.	363 + 25-yr 24-hr storm
	Container leakage (fin or fitting slow leak)	1			314 + 25-yr 24-hr storm
TR-04: Electrical Transformer (University Center)	Container rupture (internal arc)	314	225 feet North, 1750 feet East towards creek bed	Cement moat sized secondary containment with closeable valve.	940 + 25-yr 24-hr storm
	Container leakage (fin or fitting slow leak)	1			
TR-02: Electrical Transformer (Central Plant)	Container rupture (internal arc)	470	Southwest to on-campus pond	Active control and countermeasures, backed by an oil spill contingency plan for reportable discharges.	>419
	Container leakage (fin or fitting slow leak)	1			
TR-03: Electrical Transformer (Central Plant)	Container rupture (internal arc)	470	1785 feet East towards creek bed	Active control and countermeasures, backed by an oil spill contingency plan for reportable discharges.	>211
	Container leakage (fin or fitting slow leak)	1			
TR-05: Electrical Transformer (Bringle Lake Village)	Container rupture (internal arc)	419	225 feet North, 1750 feet East towards creek bed	Cement moat sized secondary containment with closeable valve.	>248
	Container leakage (fin or fitting slow leak)	1			
TR-06: Electrical Transformer (Patterson Student Center)	Container rupture (internal arc)	211	225 feet North, 1750 feet East towards creek bed	Cement moat sized secondary containment with closeable valve.	>248
	Container leakage (fin or fitting slow leak)	1			
TR-07: Electrical Transformer (Building for Academic & Student Services)	Container rupture (internal arc)	248	225 feet North, 1750 feet East towards creek bed	Cement moat sized secondary containment with closeable valve.	>248
	Container leakage (fin or fitting slow leak)	1			

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ELEV-01: Elevator Hydraulic Oil Tank (Science & Technology)	Container rupture (internal arc)	119	N/A	Active control and machine room sump pump.	>119
	Container leakage (fin or fitting slow leak)	1			
ELEV-02: Elevator Hydraulic Oil Tank (Bringle Lake Village)	Container rupture (internal arc)	93	N/A	Active control and machine room sump pump.	>93
	Container leakage (fin or fitting slow leak)	1			
ELEV-03: Elevator Hydraulic Oil Tank (Building for Academic & Student Services)	Container rupture (internal arc)	143	N/A	Active control and machine room sump pump.	>143
	Container leakage (fin or fitting slow leak)	1			
ELEV-04: Elevator Hydraulic Oil Tank (Building for Academic & Student Services)	Container rupture (internal arc)	157	N/A	Active control and machine room sump pump.	>157
	Container leakage (fin or fitting slow leak)	1			
Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)					
EMGT-01: Back-up generator fuel tank	Fill line rupture (failed hose fitting)	7	(see description above)	Active control/sorbents	N/A
EMGT-02: Back-up generator fuel tank	Fill line rupture (failed hose fitting)	7			
EMGT-03: Back-up generator fuel tank	Fill line rupture (failed hose fitting)	7			
EMGT-04: Back-up generator fuel tank	Fill line rupture (failed hose fitting)	7			
Transformers	N/A (Sealed system with no transfer)	N/A	N/A	N/A	N/A

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

^b For storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

^c For oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.


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

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training

<p>An inspection program is implemented for all oil-filled operational equipment and aboveground bulk storage containers and piping at this facility [§§112.7(e) and (f)]. Additionally, a testing program is implemented for all aboveground bulk storage containers and piping at this facility. [§§112.8(c)(6) and (d)(4)].</p> <p><i>There are no oil production or natural animal or vegetable oils in regulated containers at the facility, so §§112.9(c)(3), 112.12(c)(6) and (d)(4) do not apply.</i></p> <p>A&M-Texarkana has adopted the Steel Tank Institute standard for inspections and integrity testing (STI SP001) for all aboveground bulk storage containers and oil-filled operational equipment. See Attachment 3 for the STI SP001 categorization of the A&M-Texarkana tanks and transformers and the associated requirements.</p> <p>Written tank/container inspection procedure: consists of monthly and annual visual inspection by SPCC and facility trained personnel to look for, report, and assign responsibility to correct signs of deterioration, discharges, or accumulations of oil inside secondary containment including tanks, piping, dispenser hoses, fittings, tank/container support and foundations, corrosion of tank/container systems, and components.</p> <ul style="list-style-type: none"> • Ensure good housekeeping practices are maintained in and around the tank/container area so there is no accumulation of leaves, trash, or debris and to ensure drain valves/fittings are fully closed or capped. • Leak conditions should be promptly reported and repaired, and “wet oil/staining conditions” cleaned up completely. Signs of corrosion should be repaired and re-painted/coated as necessary. • Ensure that secondary containment systems are in good condition and capable of preventing oil discharges outside of containment system prior to clean-up. • Inspection forms (logs) will be signed and kept on file for a minimum of three years. <p>Diesel fuel storage tanks Scope/Frequency: Monthly and annually to follow written inspection procedures. Method: Visual inspections recorded on Monthly and Annual SPCC Inspection Forms (Attachment 3) based on STI SP001 standards.</p> <p>Transformers Scope/Frequency: Monthly and annually to follow written inspection procedures. Method: Visual inspections recorded on Monthly and Annual SPCC Inspection Forms (Attachment 3).</p>	☒
<p>Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. [§112.7(e)]</p>	☒
<p>A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. [§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]</p>	☒
<p>Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]</p>	☒
<p>Personnel, training, and discharge prevention procedures [§112.7(f)]</p>	☒
<p>Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. [§112.7(f)]</p>	☒
<p>A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)]</p> <p>Name/Title: <u>Juan Rodriguez – Grounds supervisor</u></p>	☒
<p>Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and/or any recently developed precautionary measures. [§112.7(f)]</p> <p>[See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]</p>	☒

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

Table G-6 Implementation and Description of Security Measures

Security measures are implemented at A&M-Texarkana to prevent unauthorized access to oil handling, processing, and storage areas.	<input checked="" type="checkbox"/>
<p>The regulatory intent of security measures at a facility is to secure and control access to the oil handling, processing and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges. The following is a description of measures deemed appropriate for A&M-Texarkana.</p> <p><u>Inherent security of backup generator fuel tanks.</u> The backup generators have UL listed protected secondary containment storage for the diesel fuel they contain. The fill caps are protected by key-locked access doors.</p> <p><u>Inherent security of electrical transformers:</u> All transformers are sealed and locked to prevent tampering. No one on campus other than trained facilities personnel are authorized to open the transformers. Any required maintenance is performed by a qualified electrician using the proper PPE (Personal Protective Equipment) and lock-out/tag-out procedures. The part of a transformer most vulnerable to tampering is the drain valve/sample port. Access is via the locked high-security cabinets, but a vandal could, at great personal risk of electrocution, open a cabinet and a drain valve, releasing oil; however, if oil is drained from a live transformer, it quickly fails, causing a power outage and alerting campus security and utilities personnel. Transformers (except TR-05 and -06) are protected from traffic and intruders by elevated pads.</p> <p><u>Surveillance and Lighting:</u> In addition to inherent security features of the generators and transformers, the campus has year-round, 24-hour police and security presence. Campus buildings are monitored via surveillance cameras and by regular patrols. Generators and transformers and their immediate vicinities are visible at night due to general area lighting.</p> <p><u>Notifications by the public:</u> As stated in Section 2 of this SPCC Plan, should a leak occur between regular security rounds, anyone in the campus community (faculty, staff, students or visitors) who observes a problem may report it directly via 911 or, for non-emergencies, to the Environmental, Health & Safety Office, or Facilities Management.</p>	

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


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

Countermeasures for an Oil Release

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

Contingency Plan Activation for a Reportable Discharge

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

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Countermeasures Response to Non-Reportable Spills and Leaks

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

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

Location of the problem and its source;

Identity of the material involved;

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

Threat of fire, explosion or other;

Injuries to personnel and their severity; and

Risks to other personnel or emergency responders.

NOTIFY

1st, immediately warn nearby persons who may be in danger or who may be trained to assist. (Do so without slowing notification of Emergency Dispatch (9-911). IF THERE IS DANGER TO LIFE OR HEALTH, ACTIVATE THE ALARM SYSTEM RIGHT AWAY.

2nd, immediately notify the Emergency Call Center @ 9-911 and provide the following:

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


The 911 Dispatcher will notify the proper authorities.

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

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

ACT (ONLY WHEN SAFE TO DO SO)

- **DO NOT ATTEMPT TO CLEAN UP LARGE SPILLS**
- **NO SMOKING! KEEP FLAMES & IGNITION SOURCES AT LEAST 50 FT AWAY!**
- **IF POSSIBLE, shut off** the source of the leak or spill.
- **QUICKLY!** Open the OIL SPILL drum (if available), put on personal protective equipment ([PPE] gloves; Tyvek coveralls; boot covers). *Spill supplies are stored at the locations shown on the Facility Diagram (Attachment 5).*
- Place storm drain plug over the storm water inlet to block oil from entering the sewer.
- **If oil has already entered the storm drain**, use map to locate storm sewer outlet and direct emergency HazMat team to the location.
- Intercept oil flow above the stormwater inlet using sorbent socks.
- For small spills, use granular sorbent to absorb the oil.
- After the leak is stopped, shovel oily sorbent into the waste bucket and close the lid.
- Place oil-soaked sorbent socks into plastic bags.
- Remove PPE and bag it.
- Place all contaminated materials (bucket and bags) into the OIL SPILL drum.
- HazMat team or EHS staff will clean or arrange the cleaning of residual contamination.
- EHS staff will arrange shipping of OIL SPILL drum and order replacement supplies.

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Spill Control Materials (Minor Releases)

Storm water inlet plugs/socks (sized to fit various drain openings)

Drums labeled "Emergency Oil Spill Supplies"

Bulk spill control materials (store at key staging locations)

Typical Drum Contents (arranged in order, top to bottom)

- ➔ Nitrile or neoprene gloves
- ➔ Heavy gauge plastic bags for contaminated sorbents, socks and PPE
- ➔ Antistatic shovel or scoop
- ➔ At least 20 petroleum absorbent pads (for oil, gas & diesel)
- ➔ At least 20 universal absorbent pads (for antifreeze & most other liquids)
- ➔ Several 3 inch x 4 ft absorbent socks (for oil, gas & diesel)
- ➔ Bags of "Oil Sponge" or other granular absorbent
- ➔ DOT/UN-rated lab pack container for spill cleanup residues




If leak or spill exceeds reporting thresholds, implement the Oil Spill Contingency Plan.

6. Contact List (§112.7(a)(3)(vi))

Table G-8 Contact List

Contact Organization / Person	Telephone Number
National Response Center (NRC) – call <u>ONLY</u> if there is an actual or threatened federal CWA-reportable discharge	1-800-424-8802
Texas State Emergency Response Commission (SERC) – call <u>ONLY</u> if there is a state reportable discharge to land or water	Spill Reporting Hotline: 1-800-832-8224
Cleanup contractor(s) <ul style="list-style-type: none"> • SET Environmental (24-hr emergency no.) 	1-877-437-7455 (1-877-43-SPILL)
Key A&M-Texarkana Personnel	
Designated Oil Spill Response Coordinator (ORC)	Office:
	Emergency:
Charles (Tony) Brandt – Director of Facilities	Office: 903-223-3049
	Emergency: 903-389-6763
Alexander Serrano – Police Chief, University Police Department	Office: 903-334-6611
	Emergency: 903-824-9954
Texarkana Fire Department	911 or 903-798-3994
Texarkana, Texas Police Department	911 or 903-798-3116
Hospitals	
HealthCARE Express (Basic trauma care)	903-791-9355
Christus St. Michael Health System (Comprehensive trauma care)	903-614-1000
Other Contact References (e.g., downstream water intakes or neighboring facilities) <ul style="list-style-type: none"> • Texarkana Office of Emergency Management • Bowie County Office of Emergency Management • Bowie County Sheriff's Office • Texarkana Golf Ranch 	Office: 903-798-3994 Office: 903-628-6776 Office: 903-798-3149 Office: 903-334-7401

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

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


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

Is it a reportable spill that requires governmental notification?

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

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

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

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If the spill is determined to be reportable to the state only (≥ 25 gal or ≥ 210 gal onto land, see table above) or to both the state and federal government (spill reaches surface water and is capable of producing a sheen), follow these steps as soon as possible but not later than 24 hours after the discovery of the spill:


1. COLLECT INFORMATION TO BE REPORTED

State	Federal	Check boxes indicate which information must be provided for State SERC notifications (30 TAC §327.3(d)) and which is required for Federal National Response Center notifications (40 CFR 300.405(d)). DO NOT DELAY FOR LACK OF COMPLETE INFORMATION!
<input type="checkbox"/>	<input type="checkbox"/>	The name, address and telephone number of the person making the telephone report.
<input type="checkbox"/>	<input type="checkbox"/>	Name and address of the party responsible for the incident.
<input type="checkbox"/>	<input type="checkbox"/>	The date, time, and exact address or location of the spill or discharge.
<input type="checkbox"/>	<input type="checkbox"/>	A specific description or identification of the petroleum product or other oil discharged or spilled.
<input type="checkbox"/>	<input type="checkbox"/>	An estimate of the total quantity discharged or spilled into the environment.
<input type="checkbox"/>	<input type="checkbox"/>	An estimate of the quantity discharged into or upon water in storm sewers, ditches or streams.
<input type="checkbox"/>	<input type="checkbox"/>	The duration of the incident.
<input type="checkbox"/>	<input type="checkbox"/>	The name of the surface water or a description of the waters in the state affected or threatened by the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	The cause / source of the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	A description of the extent of actual or potential water pollution or harmful impacts to the environment and an identification of any environmentally sensitive areas or natural resources at risk.
<input type="checkbox"/>	<input type="checkbox"/>	If different from the person making the report, the names, addresses, and telephone numbers of the responsible person and the contact person at the location of the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	A description of any actions that have been taken, are being taken, and will be taken to contain and respond to discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	Whether an evacuation may be needed.
<input type="checkbox"/>	<input type="checkbox"/>	Any damages or injuries caused by the discharge.
<input type="checkbox"/>	<input type="checkbox"/>	Any known or anticipated health risks.
<input type="checkbox"/>	<input type="checkbox"/>	The names of individuals and/or organizations who have also been contacted.
<input type="checkbox"/>	<input type="checkbox"/>	The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	Weather conditions at the incident location.
<input type="checkbox"/>	<input type="checkbox"/>	Any other information that may be significant to the response action.

2. **IMMEDIATELY** CONTACT THE FOLLOWING (as indicated by the size of the spill and whether or not it reaches surface water)

- State Emergency Response Commission's **Spill-Reporting Hotline** at **1-800-832-8224**
- Federal **National Response Center** at **1-800-424-8802** or, if you have Internet access, use the **NRC On-Line Reporting Tool** at:

<http://www.nrc.uscg.mil/nrchp.html>

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

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

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

You must submit the following information to the RA:

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


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


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

Table G-10 General Rule Requirements for Onshore Facilities	N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and 112.12(b)(1)]	<input type="checkbox"/> <input checked="" type="checkbox"/>
Valves of manual, open and closed design are used for the drainage of diked areas. [§§112.8(b)(2) and 112.12(b)(2)]	<input type="checkbox"/> <input checked="" type="checkbox"/>
The emergency generator tanks and transformers at A&M-Texarkana are designed to accepted industry standards for the materials that they contain, including material compatibility and conditions of storage such as pressure and temperature. [§§112.8(c)(1) and 112.12(c)(1)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
Secondary containment for the emergency generator, double-walled bulk storage containers (including mobile/portable oil storage containers) hold slightly more than the capacity of the largest inner tank containers plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: [§§112.8(c)(3) and 112.12(c)(3)] <ul style="list-style-type: none"> • Bypass valve is normally sealed closed <input type="checkbox"/> <input checked="" type="checkbox"/> • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines <input type="checkbox"/> <input checked="" type="checkbox"/> • Bypass valve is opened and resealed under responsible supervision <input type="checkbox"/> <input checked="" type="checkbox"/> • Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3] <input type="checkbox"/> <input checked="" type="checkbox"/> 	<input type="checkbox"/> <input checked="" type="checkbox"/>
For completely buried metallic tanks installed on or after January 10, 1974 at this facility [§§112.8(c)(4) and 112.12(c)(4)]: <ul style="list-style-type: none"> • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions. <input type="checkbox"/> <input checked="" type="checkbox"/> • Regular leak testing is conducted. <input type="checkbox"/> <input checked="" type="checkbox"/> 	<input type="checkbox"/> <input checked="" type="checkbox"/>
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]: <ul style="list-style-type: none"> • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions. <input type="checkbox"/> <input checked="" type="checkbox"/> 	<input type="checkbox"/> <input checked="" type="checkbox"/>
Each aboveground bulk container (i.e., emergency generator fuel tank) is tested or inspected for integrity on a regular schedule and whenever material repairs are made according to Steel Tank Institute standard SP001 (see the introduction to Attachment 3, which describes the basis for the selected inspection and testing program) . Scope and frequency of the inspections and inspector qualifications are in accordance with the STI industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.8(c)(6) and §112.12(c)(6)(i)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
Outsides of bulk storage containers (i.e., emergency generator fuel tanks) are frequently inspected for signs of deterioration, or discharges, or accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
For bulk storage containers that are subject to 21 CFR part 110 which are shop fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule	<input type="checkbox"/> <input checked="" type="checkbox"/>

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Table G-10 General Rule Requirements for Onshore Facilities	N/A	
in Attachments 3.1 and 3.2] [§112.12(c)(6)(ii)]		
<p>Each bulk storage container is provided with a system or documented procedure to prevent overfills for the container.</p> <p>Backup Generator Diesel Fuel Transfer Procedures & Spill Response: Even though the emergency generator fuel tanks are equipped with overfill prevention, release scenarios suggest that a spill, however unlikely, may occur due to container overfill or fill line rupture. Any such spill is likely to be less than five gallons and should not threaten navigable waters. Facility staff or contractors who maintain and refuel or top-off generators are:</p> <ul style="list-style-type: none"> • Trained in fuel transfer/spill prevention procedures (see the general Oil Transfer Procedure Checklist below); • Provided with facility contact information should a spill occur, or irregular condition be observed; and, • Supplied with on-board drain-covers and spill control/cleanup supplies to handle small spills. <p>Fuel vendor personnel visually inspect tank and fuel levels with a calibrated dip stick and preset the quantity of fuel to be transferred from the tank truck to help ensure there is no overfill.</p> <p>Electrical Transformers: All electrical transformers are sealed and locked. They contain PCB-free mineral oil as the cooling/insulating fluid. Only trained and qualified personnel are allowed to open the transformers. Any required maintenance is performed by qualified electricians using the proper Personal Protective Equipment (PPE) and lock-out/tag-out procedures.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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General Oil Transfer Procedure Checklist*
 (*also to be used for training and awareness)

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

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

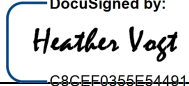
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ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

Attachment 1.1 – Five Year Review Log

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


Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and Signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
12/05/2016	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Signature on file</i> Joshua Harris
01/12/2018	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Signature on file</i> Joshua Harris
02/11/2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Signature on file</i> Joshua Harris
01/05/2023	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Heather Vogt  <small>C8CEF0355E54401...</small>
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	


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Attachment 1.2 – Technical Amendment Log

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

Table G-15 Description and Certification of Technical Amendments		
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment
12/05/2016	Updated facility description and contact list. Migrated to standard A&M System ENVM format.	<u>Signature on file</u> Joshua Harris
01/12/2018	None. Updated personnel contact information only.	<u>Signature on file</u> Joshua Harris
02/11/2019	Added information for 2 new elevators, 2 new transformers, and 1 emergency generator added to campus due to new construction.	<u>Signature on file</u> Joshua Harris
01/05/2023	Annual review and personnel change	DocuSigned by:  Heather Vogt <small>C90FE0355F54401...</small>

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ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

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


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

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

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

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5) ^a	
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	<input checked="" type="checkbox"/>
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil release or discharge including: <ol style="list-style-type: none"> 1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges. 2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil release or discharge is discovered. 3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP). 4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including: <ol style="list-style-type: none"> 1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally. 2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated. 3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
(d) Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge including: <ol style="list-style-type: none"> 1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel. 2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans. 3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations. 4) Provisions for varying degrees of response effort depending on the severity of the oil discharge. 5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses. 6) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

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

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ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

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

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

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

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

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


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

Size, Gallons	Category 1	Category 2	Category 3
	P (emergency generator tanks and transformers)	P	P (cooking oil tank), E&L(10)
Shop built tank	P	P, E&L(10)	[P, E&L(5), I(10)] or [P, E(5) & L(2)]
	P, E(20)	[P, E(10)& I(20)] or [P, E(5) & L(10)]	[P, E&L(5), I(10)] or [P, E(5) & L(1)]
	P, E(20)	P, E&L(5), I(15)	P, E&L(5), I(10)
Field Erected Tank	P, E(5), I(20)	P, E(5), I(20)	P, E(5), I(20)
Portable Container	P	P	P **

Tank Categories

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

- **Scope:** Applies to tanks/containers holding flammable or combustible liquids or other oils with specific gravity near 1.0, temperatures from ambient up to 200° F and at or near atmospheric pressure.
- **CRDM** – A Continuous Release Detection Method is a means of passively detecting a release of liquid through inherent design. Releases are *visually detected* by facility operators. CRDM types include (1) tanks with Release Prevention Barriers (RPB), (2) Secondary containment tanks including double-wall ASTs, and (3) elevated tanks/containers.
- **RPB** – A Release Prevention Barrier is a liquid containment barrier under the tank/container that diverts any leak toward the perimeter where it can easily be seen. An RPB can be a concrete foundation (e.g., pad-mounted transformers, tanks on concrete, or portable containers on concrete or spill-containment pallets).
- **Spill Control** is a passive means of preventing release to the environment and includes remote impounding, secondary containment dikes/berms, and double-walled tanks/containers.

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


Tank Configuration	Tank has CRDM?	Tank has Spill Control?	AST Category
Single wall AST in contact with ground*	No	No (CO-01)	3
	No	Yes	2
Elevated tank (on grills, gratings or supports)**	Yes	Yes (TR-01, 02, 03, 04, 07)	1
AST with RPB	Yes	Yes	1
AST with double-bottom	Yes	Yes	1
Double-wall AST with overfill prevention***	Yes	Yes (EMGT-01, 02, 03, 04)	1
Double-wall AST without overfill prevention	Yes	No	3
Vertical tank resting on concrete (conforms with definition of RPB)****	Yes	Yes	1
	Yes	No (TR-05, 06)	3

* A&M-Texarkana used cooking oil tank CO-01 is classified as a single wall AST in contact with ground, and thus falls into AST Category 3.

** A&M-Texarkana transformers TR-01, 02, 03, 04, and 07 are all classified as elevated tanks (on grills, gratings, or supports), and thus fall into AST Category 1.

*** A&M-Texarkana emergency generator diesel fuel tanks are double-wall ASTs with overfill prevention and are thus categorized as AST Category 1

**** Transformers TR-05 and TR-06 are technically equivalent to vertical tanks resting on concrete without spill control (i.e., no containment moat) and would be normally be classed as AST Category 3. If they were bulk storage containers, they would require passive, sized secondary containment and periodic integrity testing according to 40 CFR §112.8(c)(2) and (6). However, SPCC rules exclude transformers from the definition of *bulk storage container* and instead defines them as *oil-filled operational equipment* (§112.2), which is not included in the sized secondary containment and integrity testing requirements of §112.8.

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Attachment 3.1 – Monthly Inspection

Table G-16 Inspection Form

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

SPCC Monthly Inspection Form *

General Inspection Information:

Inspection Date: _____ (Retain inspection record for at least 36 months from inspection date)


Inspector Name: _____ UIN: _____ Dept.: _____
Printed Name and Signature

Tanks / Containers Inspected (ID #'s): _____

Inspection Guidance:

- ✓ **Who can perform inspections?** This periodic inspection covers easily observable condition of bulk storage tanks/containers, oil-filled operational equipment, and containment structures. It ***does not require a certified inspector and may be performed by any trained person*** who knows the site and can identify changes and developing problems.....
- ✓ Where available, follow the manufacturer recommended inspection/testing schedules and procedures.
- ✓ Upon discovery of water in the primary tank/container, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect water for oil or other regulated products and disposed of it properly.
- ✓ Non-conforming items important to tank/container or containment integrity may require evaluation by an experienced engineer, inspector, or manufacturer representative to determine the corrective action. Note non-conformances and corrective actions in the comment section.
- ✓ Retain the completed checklists for 36 months.
- ✓ In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.
- ✓ **A YES indicates a non-conformance requiring action to address an observed problem. Whenever possible, immediately correct an observed problem.**


Item		Status		Comments (Include tank/container number(s) and describe the deficiencies.)
		YES	NO	
1.0	Primary and Secondary Containment			
1.1	Noticeable distortions, buckling, denting, bulging, rust, loss of coating or other physical deterioration of primary container?			
1.2	Tanks / containers improperly positioned or stored?			
1.3	Water in primary container, secondary containment, interstice, or spill container?			
1.4	Secondary containment dikes, walls, moats or curbs <u>not</u> in good condition?			

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Item	Status		Comments (Include tank/container number(s) and describe the deficiencies.)
	YES	NO	
1.5			Debris or fire hazard in containment?
1.6			Drain valves inoperable or found in the <u>open</u> position?
1.7			Egress pathways obstructed or gates/doors inoperable?
2.0 Leak Detection			
2.1			Visible signs of leakage from or around the 1. tank or container, 2. support pad or foundation, 3. secondary containment, 4. surrounding storage area or ground or 5. interstice?
3.0 Tank Equipment, Attachments and Appurtenances			
3.1			Liquid level gauge (if present) unreadable or in poor condition?
3.2			Any tank / container valves or openings improperly sealed?
3.3			Any aboveground valves, piping, or appurtenances in poor condition?
3.5			Spill containment box on fill pipe filled with debris or water or overflow alarm or valve inoperable (if so equipped)?
3.4			Support structure, foundation, ladder and/or platform unsecure or showing signs of severe corrosion or damage?
4.0 Facility Drainage and Other Conditions			
4.1			Diked or undiked drainage deteriorated or damaged?
4.2			Campus/facility storm water outfalls show evidence of oil releases?
4.3			Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?
Additional Comments:			

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


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

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

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

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SPCC Annual Inspection Form***General Inspection Information:**


Inspection Date: _____ (Retain inspection record for at least 36 months from inspection date)

Inspector Name: _____ UIN: _____ Dept.: _____
Printed Name and Signature

Tanks / Containers Inspected (ID #'s): _____


Inspection Guidance:

- ✓ **Who can perform annual inspections?** The annual inspection examines external conditions and meets the EPA's SPCC periodic integrity testing requirements (40 CFR §112.8(c)(6)) for Category 1 bulk storage tanks/containers and oil-filled operational equipment. This visual inspection does not require a Certified Inspector and may be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Tanks >5,000 gallons or Category 2 or 3 tanks require additional inspection and possibly testing by a Certified Inspector. †
- ✓ For equipment not included in this form, follow the manufacturer recommended inspection/testing schedules and procedures.
- ✓ Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- ✓ In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- ✓ Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- ✓ Retain the completed checklists for 36 months.
- ✓ Complete this checklist on an annual basis supplemental to the owner monthly performed inspection checklists.
- ✓ Note: If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.
- ✓ **A YES designates an item in a non-conformance status. This indicates that action is required to address a problem.**

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Item	Status		Comments (Include tank/container number(s) and describe the deficiencies.)
	YES	NO	
1.0 Primary and Secondary Containment			
1.1	Containment structure shows evidence of: <ul style="list-style-type: none"> Holes or cracks in containment wall or floor Washout Liner degradation Corrosion Leakage Paint failure Tank settling 		
2.0 Tank Foundation and Supports			
2.1	Foundation shows evidence of settlement or washout?		
2.2	Concrete pad or ringwall is cracking or spalling?		
2.3	Supports shows signs of corrosion, paint failure, etc.?		
2.4	Water does not drain away from tank or container?		
2.5	Grounding strap is not secure or is deteriorated?		
3.0 Cathodic Protection			
3.1	For a galvanic cathodic protection system, is the system nonfunctional or the wire connections deteriorated?		
3.2	For an impressed current system, are the operational components (power switch, meters, and alarms) nonfunctional or in poor working order and are there missing records of hour meter, ammeter and voltmeter readings?		
4.0 Tank Shell, Heads and Roof			
4.1	Is the tank/container coating failing or deteriorated?		
4.2	Does the tank/container shell have dents, buckling, bulging, corrosion or cracking?		
4.3	Does the tank/container top have low points or standing water indicating slope problems?		
5.0 Tank Equipment			
5.1	Vent components not moving freely or vent passageways obstructed for: <ul style="list-style-type: none"> Emergency vent covers Pressure/vacuum vent poppets Other moving vent components 		
5.2	Are valves leaking, corroded or damaged?		
5.2.1	Anti-siphon, check or gate valve not properly operating?		
5.2.2	Pressure regulator valve not operating properly?		
5.2.3	Expansion relief valve not operating properly?		
5.2.4	Solenoid valve not operating properly?		
5.2.5	Fire and shear valves not operating properly?		
5.3	Interstitial leak detection equipment not working properly?		
5.4	Spill containment boxes (if present) on fill pipe compromised?		
5.5	Strainer in dirty or poor condition?		
5.6	Filter in poor condition, expired or leaking?		
5.7	Flame arrestors corroded or blocked?		
5.8	Leak detector for submersible pump systems failing, not the correct part, or improperly installed?		


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

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

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

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

The facility drainage log is applicable to the transformers TR-01--TR-04 and TR-07, which are installed over sized secondary containment moats.

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

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

			Name of Responsible Person	UIN#	Signature			


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Attachment 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log

Date	Description / Scope	Attendees
01/11/2017	Training covers components of our site specific SPCC plan, overview of SPCC regulations, preventive inspection procedures and responsibilities, notification procedures in event of a spill, spill response and clean-up procedures, location of spill control media and equipment, storm sewer drainage plans, responsibilities for inspection logs and reporting oil discharges.	Richard Lynes Juan Rodriguez
01/05/2023	Training covers a review of the components of our site specific SPCC plan, overview of SPCC regulations, preventive inspection procedures and responsibilities, notification procedures in event of a spill, spill response and clean-up procedures, location of spill control media and equipment, storm sewer drainage plans, responsibilities for inspection logs and reporting oil discharges.	Juan Rodriguez Boyd Smith Robert Harding Brian King Ty Sparks

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ATTACHMENT 4 – Discharge Notification Form


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

1. COLLECT INFORMATION TO BE REPORTED

State	Federal	Check boxes indicate which information must be provided for State SERC notifications (30 TAC §327.3(d)) and which is required for Federal National Response Center notifications (40 CFR 300.405(d)). DO NOT DELAY FOR LACK OF COMPLETE INFORMATION!
<input type="checkbox"/>	<input type="checkbox"/>	The name, address and telephone number of the person making the telephone report.
<input type="checkbox"/>	<input type="checkbox"/>	Name and address of the party responsible for the incident.
<input type="checkbox"/>	<input type="checkbox"/>	The date, time, and exact address or location of the spill or discharge.
<input type="checkbox"/>	<input type="checkbox"/>	A specific description or identification of the petroleum product or other oil discharged or spilled.
<input type="checkbox"/>	<input type="checkbox"/>	An estimate of the total quantity discharged or spilled into the environment.
<input type="checkbox"/>	<input type="checkbox"/>	An estimate of the quantity discharged into or upon water in storm sewers, ditches or streams.
<input type="checkbox"/>	<input type="checkbox"/>	The duration of the incident.
<input type="checkbox"/>	<input type="checkbox"/>	The name of the surface water or a description of the waters in the state affected or threatened by the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	The cause / source of the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	A description of the extent of actual or potential water pollution or harmful impacts to the environment and an identification of any environmentally sensitive areas or natural resources at risk.
<input type="checkbox"/>	<input type="checkbox"/>	If different from the person making the report, the names, addresses, and telephone numbers of the responsible person and the contact person at the location of the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	A description of any actions that have been taken, are being taken, and will be taken to contain and respond to the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	Whether an evacuation may be needed.
<input type="checkbox"/>	<input type="checkbox"/>	Any damages or injuries caused by the discharge.
<input type="checkbox"/>	<input type="checkbox"/>	Any known or anticipated health risks.
<input type="checkbox"/>	<input type="checkbox"/>	The names of individuals and/or organizations who have also been contacted.
<input type="checkbox"/>	<input type="checkbox"/>	The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill.
<input type="checkbox"/>	<input type="checkbox"/>	Weather conditions at the incident location.
<input type="checkbox"/>	<input type="checkbox"/>	Any other information that may be significant to the response action.

2. IMMEDIATELY CONTACT THE FOLLOWING (as indicated by the size of the spill and whether or not it reaches surface water)

		→ State Emergency Response Commission's Spill-Reporting Hotline at 1-800-832-8224
		→ Federal National Response Center at 1-800-424-8802 or, if you have Internet access, use the NRC On-Line Reporting Tool at:
		http://www.nrc.uscg.mil/nrchp.html

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ATTACHMENT 5 – Facility Diagram

