Spill Prevention, Control and Countermeasure Plan

Environment Health & Safety
Park Street House
Bowling Green, KY 42101
270-745-2054/2858

Contents	Pages

Facility Name:	Western Kentucky University
Address:	1906 College Heights Blvd. #11046 Bowling Green, KY 42101-1046
Contact Name:	***Sharmila Pradhan, Manager, Environmental Services*** ***Mark Pendley Director, Environment Health & Safety*** (270) 745-2054 / -2858
Location:	Western Kentucky University Main Campus is in Warren County, Bowling Green, KY. Latitude: N 36.58' 49" Longitude: W 86. 27' 08"
Facility Description:	State supported institution offering undergraduate and graduate education.

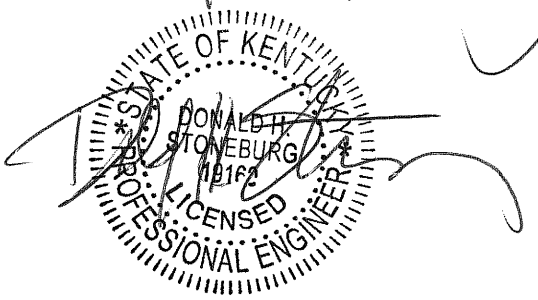
Certification - 40 CFR 112.3

I hereby certify that I have examined the facility and, being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices, including applicable industry standards and the requirements of 40 CFR Part 112. The Plan is adequate for the facility and establishes procedures for inspection and testing.

Engineer: Donald H. Stoneburg

Signature:

Seal:



State: Kentucky

Date: 12/3/10

Review by: 07/01/2015

SPCC Plan Review – 40 CFR 112.5(b)

The Manager of Environmental Services and a 3rd party Professional Engineer must complete a review and evaluation of the SPCC Plan along with representatives from the Department for Environment, Health & Safety and the Department of Facilities Management (DFM). The review must be conducted at least once every five years, unless there is a change in facility that materially affects the potential for discharge. Evidence of these reviews shall be recorded below. The plan amendments must be implemented within 6 months of the review.

Name	Title	Signature
Sharmila Pradhan	Environmental Manager, EHS	
Larry Page	Environmental Programs Coordinator	
Charles Harrison	Manager Maintenance, DFM	
Greg Fear	Manager Campus Services, DFM	

Review by: 07/01/2015

	Amendments
1.	Plan amended to incorporate July 2002 rule changes
2.	SPCC Committee formed and met to review plan.

Management Approval – 40 CFR 112.7
This SPCC Plan is fully approved by the management of Western Kentucky University. The university has committed the necessary resources to implement measures described in this plan.

John Osborne, Vice President Campus Services & Facilities — Date: 12-6-10

Discussion of Conformance – 40 CFR 112.7(a)(1)
Western Kentucky University is aware of the requirements of 40 CFR Part 112 and has complied with the requirements for providing a facility diagram, discharge reporting procedures, containment, inspection and testing, personnel training and security at the oil storage facilities and electrical equipment located on the Bowling Green, Kentucky campuses.

Deviations from Plan Requirements – 40 CFR 112.7 (a)(2)
This plan deviates from 112.7(g) (1) because there is no fence around the two 1000 gallon ASTs at the University Farm's Shop tanks, the 560 gal tank at the Steam Plant, and the 4000 gal tank at Parking & Transportation. However, at the Farm and P&T the tank pumps are locked and will not dispense in the absence of authorized persons. The steam plant tanks are directly connected to emergency generators and are not designed for dispensing. WKU Police patrol these areas at night and WKU staff work within sight of the tanks during normal working hours. The Parking &

Transportation tanks will have a fence around them in a year. Other requirements of section (g) have been fulfilled.
The portable emergency generator has a single-walled tank without containment. This tank has been detached from the generator and tagged out of service until it can be replaced, or adequate containment provided for it. The following forms of containment are acceptable: containment dike made of metal, wood lined with epoxy, plastic/fiber; portable, collapsible containment for the entire trailer; new double-walled tank. Containment should be for at least 102% of the tank capacity.

Facility Diagram – 40 CFR 112.7(a)(3)
The facility diagram is provided as Appendix A. Locations of electrical equipment such as transformers, generators and switches are provided in the Facility Diagram.

(i) Stationary Storage: Total aboveground stationary oil storage: > 25,114 gallons

Number of units	*Description (petroleum product)*	*Location ID # on facility diagram*	*Volume (gallons)*
1	Aboveground Split Tank (#2 Fuel Oil/UNL Gasoline)	Facilities Management	560
1	Aboveground Tank (#2 Fuel Oil)	Transportation Garage	4000
1	Aboveground Tank (Engine Crankcase Oil)	Transportation Garage	250
1	Aboveground Tank (Bio-Diesel Fuel)	Bio-Diesel Learning Lab (WKU Farm Taylor Center)	3000
2	Aboveground Tanks (Gasoline & No.2 Fuel Oil)	WKU Farm Shop	1000 each
13	Tanks for Emergency Generators (#2 Fuel Oil)	Barnes-Campbell Hall Bemis-Lawrence Hall Central Steam Plant E.A. Diddle Arena Hugh Poland Hall L.T. Smith Stadium Minton Hall Pearce-Ford Tower Rodes-Harlin Hall Portable generator* Portable generator*University Farm	300 300 560 1500 300 200 300 300 300 300 420 560

* Contact DFM Maintenance Manager for location. Parked at 2305 Nashville Road when not in use.

Number of units	*Description (petroleum product)*	*Location ID # on facility diagram*	*Volume (gallons)*
33	Outdoor pad mount transformers	Baseball Field House	260
		Center for Engineering & Biology #1	425
		Center for Engineering & Biology #2	410
		Central Steam Plant #1	233
		Central Steam Plant #2	237
		Central Steam Plant #3	102
		College of Education (Pending)	428
		E.A. Diddle Arena	368
		Food Services	240
		Gilbert, J.T. Hall	248
		Health Services Building	229
		McCormack Hall	248
		Meredeth Hall	195
		Parking Structure #1 Facilities Management 1	142
		Parking Structure #1 Facilities Management 2	142
		Parking Structure #1 Police Department	185
		Preston Health & Activities Center	185
		Rock House, The	130
		Rodes-Harlin Hall	300
		Scheinder Hall	295
		Smith, L.T. Stadium East Grandstand	496
		Smith, L.T. Stadium Practice Field	496
		Snell Hall #1	435
		Snell Hall #2	526
		Supply-Services Building	195
		Tennis Courts	104
		Thompson Complex Central Wing #1	403
		Thompson Complex Central Wing #2	432
		Thompson Complex Central Wing #3	332
		Van Meter Hall	253
		Zacharias Hall	195
		Weatherby #1	400
		Weatherby #2	295
1	Indoor Transformers	Thompson Complex North Wing	295
			400

(ii) Mobile Storage: Drums are staged at the locations listed below and then transported by Shipping & Receiving to various buildings and departments on the WKU campus, or are transported by EHS to the Hazardous Waste Accumulation Facility. The number of drums varies, so the numbers below are estimates only.

No.	*Description (petroleum product)*	*Location*
2	55 gallon drums (various oils)	Supply Service Building – Shipping and Receiving
2	55 gallon drums (various oils)	WKU Farm Taylor Center
2	55 gallon drums (various oils)	WKU Farm Maintenance Shop
2	55 gallon drums (various thinners, mineral spirits, paints and oils)	Facilities Management Paint Shop and Auto Repair Shop
2	55 gallon drums (various oils)	Chilled Water Plant
6	55 gallon drums (various oils)	Hazardous Waste Accumulation Facility

(iii) Discharge Prevention Measures

Discharge prevention measures are as follows:

Facilities Management –one 560 gal aboveground tank

- Double walled tanks
- Overfill Alarm
- Overfill containment
- Pump and hose is on top of ASTs
- Interstitial leak detection
- Visual level indicator
- Monthly inspection

Transportation Garage – one 4000 gal aboveground tank

- Double walled
- Overfill alarm
- Overfill containment
- Interstitial leak detection
- Monthly inspection

WKU Farm Shop – two 1000 gal aboveground tanks

- Double walled tanks
- Overfill protection
- Overfill containment
- Visual level indicator
- Pump and hose is on top of ASTs
- Piping is all on top of ASTs
- Monthly inspection

Bio-Diesel Learning Lab – 3000 gal aboveground tank

- Double-walled tank
- Overfill protection Interstitial leak detection
- Monthly inspection

Transportation Garage – one 275 gal aboveground tank

- Single walled steel tanks
- Concrete containment room
- Located inside
- Monthly inspection

Small Transformers

- Annual inspection by Facilities Management

Generators

- Double-walled steel tanks except
- Heat Plant generator has single walled tank with dike
- Monthly inspection by Facilities Management

Drums

- Containment within a building

Elevators

- Containment within a building
- Maintenance scheduled by DFM

Spill kits are provided at each facility. Oil-handling employees are trained to use the spill kits and aware of procedures in case of a discharge. Spill supplies will be replenished by responsible departments as needed. Spill kit supplies are stocked in the Facilities Management Stockroom and the Department of Environment, Health & Safety's spill response trailer.

(iv) Discharge / Drainage Controls

Secondary containment has been provided for all aboveground storage tanks. Most buildings do not have storm drains and thus provide containment for indoor oil spills from drums. The Transportation Garage on Campbell Lane has an oil-water separator.

(v) Countermeasures for Discharge Discovery, Response and Cleanup

Oil handling employees are most likely to be involved or at least present at the time a discharge is discovered. These employees have been trained to respond to incidental spills and prevent discharges to storm drains or sinkholes. The incidental spill response and cleanup procedures are described in Appendix B.

(vi) Methods of Disposal

The departmental supervisors will ensure that all materials used for cleaning oil spills are disposed in accordance with regulations, such as Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), etc. In order to schedule a waste pick-up through EHS, employees are required to submit a complete and signed Waste Pick-up Request form which can be obtained either by calling 5-2395 or by on-line submission at the EHS website: http://www.wku.edu/Dept/Support/Legal/EHS/

(vii) Contact List

See Appendix C for a contact list.

Spill Reporting Procedures - 40 CFR 112.7(a)(4)
All Western Kentucky University employees should report major oil spills to the University Police by calling 911 or 5-2548. Other agencies will be contacted by either the police dispatcher or the Facility Response Coordinator. 911 calls made from cell phones or off-campus phones will be received by the Bowling Green Police dispatch center, and directed to the WKU Police.

See Appendix C for detailed spill reporting procedures.

Emergency Procedures - 40 CFR 112.7 (a) (5)
Emergency procedures are initiated by the dispatcher under the following circumstances:

a) when a spill is beyond the control of trained oil handling employees,
b) when any oil has already reached a storm drain, sinkhole or property boundary.

The dispatcher will then inform the Facility Response Coordinator and the Bowling Green Fire Department.

The Facility Response Coordinator is responsible for evaluating the situation and if required, call a cleanup contractor. S/he will also inform the Kentucky Division for Waste Management, State and Local Emergency Planning Commissions and the National Response Center, as required. The Facility Response Coordinator will follow requirements of the SPCC Rule (40 CFR 112.4) and Kentucky Administrative Regulations for notifying the appropriate agencies.

Potential Equipment Failures – 40 CFR 112.7(b)

Department of Facilities Management (unleaded gasoline, diesel fuel):

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure – tank (1 x 560 gal. AST)	560	W. to Storm Drain (Lost River)
Complete failure - piping	100	W. to Storm Drain (Lost River)
Re-fuelling Spill	525 (single compartment of tanker)	W. to Storm Drain (Lost River)

Transportation Garage, Campbell Lane (Diesel Fuel, 4000 gallons)

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure – tank	4000	S to Campbell Lane (Lost River)
Complete failure - piping	4000	See above
Re-fuelling Spill	1000	See above

Transportation Garage, Campbell Lane (Motor Oil, 250 gallons)

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure - tank	250	Contained in Oil Storage Room
Complete failure - piping	250	Floor Drains to 500 gallon Oil/Water Separator
Re-Filling Spill	100	Contained in Oil Storage Room

Bio-Diesel Learning Laboratory (Bio-Diesel Fuel, 3000 gallons)

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure-tanks	3000	N. to Wetlands Pond (Lost River)

WKU Farm Shop (Diesel Fuel, 1000 gallons)

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure tank	1000	SW to sinkhole (Lost River)

WKU Farm Shop (Unleaded Gasoline, 1000 gallons)

Failure Scenario	Max. Vol. (in gallons)	Flow Direction
Complete failure tank	1000	SW to sinkhole (Lost River)

Containment and Diversionary Structures – 40CFR 112.7 (c)

1) Tanks located outside at Facilities Management, Transportation Garage, Bio-Diesel Learning Laboratory and University Farm are double-walled.
2) Every bulk oil container storage site at Western Kentucky University has a spill kit in close proximity to enable staff to prevent or divert a discharge. EHS has additional supplies which can be provided upon request.
3) All drums are stored inside buildings which provide containment as long as there are no storm drains. If a storm drain is present in a room, it will be covered as soon as it is discovered.
4) Electrical equipment present on the campus is constructed according to industry standards and to withstand the usual weathering processes.

Demonstration of Practicability – 40 CFR 112.7 (d)

Western Kentucky University's management has determined that the containment and diversionary structures installed to prevent a discharge are practicable.

Inspection, Tests and Records – 40 CFR 112.7(e)

Visual observations by personnel will be carried out to check for damage or leakage of tanks, accumulation of water in diked areas and serviceability of dike drain valves.

The checklist provided in Figure 2 is used during monthly inspections. The checklist may be included in work orders for scheduled equipment maintenance. These inspections are signed by the designated person responsible for each facility/operation (see below). The monthly inspection checklist and dike drainage records are sent to EHSO. All records pertaining to this SPCC plan are maintained at EHS (SPCC Binder) for three years.

Planning, Design & Construction Department may provide tank inspection checklists to contractors for documenting inspections of oil storage at construction sites, or other project sites. Project Managers are aware that spills from equipment and storage containers that belong to a contractor will be

cleaned-up by contractor's personnel, using their resources. DEHS will provide oversight and guidance for such activities.

Personnel, Training and Spill Prevention Procedures – 40 CFR 112.7(f)

1) Oil-handling employees at Western Kentucky University will be instructed in the operation and maintenance of equipment, discharge procedure protocols, relevant laws and regulations, facility operations and contents of the SPCC Plan. DEHS will provide SPCC training online. Annual classroom sessions will be provided, as needed.
2) The following persons are responsible for discharge prevention at their respective facility or operation. These persons will be responsible for maintaining a copy of the SPCC plan at their facility and making it available to employees; informing employees to check and replenish spill kits, as needed; informing EHS about any new oil handling employees to ensure their inclusion in SPCC training; ensuring timely completion and submission of monthly inspection reports and dike drainage logs.

Name	Title	Facility / Operation
Greg Fear	Campus Service Manager	Aboveground Tanks at Facilities Management
Charles Harrison	Maintenance Manager	Generator Tanks & Electrical Transformers
Christopher Moore	Staff Engineer, Engineering Dept.	Aboveground Tank at Bio-Diesel Laboratory
Stephen D. Rowland	Transit Manager	Aboveground Tanks at Transportation Garage
Joey Reynolds	Agricultural Technician	Aboveground Tanks at University Farm

3) Annual discharge prevention briefings or SPCC Training is offered by the EHS Office to all operating personnel who work with petroleum products or storage tanks. Online training is available through BlackBoard.

Security – 40 CFR 112.7(g)

1) Tanks are located within secure fencing or have their pumps locked when authorized personnel are not in the immediate area. Western Kentucky University maintains a fully accredited 24-7 Police Department that provides security to all University owned structures and equipment.

2) There is adequate lighting available in order to identify a spill at night and to prevent vandalism.

Tank car and Tank Truck Loading/Unloading Rack – 40 CFR 112.7 (h)

1) Western Kentucky University does not own any tank car or tank truck loading/unloading racks. Tank refueling procedures meet the minimum requirements established by the Department of Transportation. A trained staff member from Western Kentucky University is present along with the tanker driver during refueling.

2) Overfill alarms are provided in certain tanks to prevent spills due to overfilling. Western Kentucky University will not load/unload bulk fuel. The transfer of bulk fuel will be conducted by certified petroleum handling contractors. Tank trucks are checked and maintained by the University's fuel supplier during and after each loading and unloading. The university's oil supplier, Key Oil Company has notified Western Kentucky University that they are responsible for any spill occurring from their own vehicles.
3) All tank cars/trucks are inspected prior to filling and departure. All outlets and drains on these vehicles are tightened, adjusted or replaced to prevent liquid discharge while in transit.

Brittle Fracture Evaluation – 40 CFR 112.7 (i)
Western Kentucky University does not own any field-constructed tanks. All the aboveground storage tanks listed in this plan are shop-fabricated.

Requirements for On-shore Facilities – 40 CFR 112.8 (a)
Western Kentucky University meets the requirements of this section as described below.

Facility Drainage – 40 CFR 112.8 (b)
1) Valves prevent a spill or excessive leakage of oil from dikes. They are inspected every month.
2) All valves have a manual, open-and-close design.
3) There are no ponds, lagoons or catchment basins at this campus.
4) There is no diversion system for all ditches at the university. However, specific facilities like the Transportation Garage have oil-water separators to collect oil within the facility.
5) Western Kentucky University does not have a waste water treatment unit.

Bulk Storage Tanks – 40 CFR 112.8 (c)
1) Each aboveground tank is compatible with the contents and conditions of its storage. All aboveground storage tanks meet the applicable standards of the Underwriter's Laboratory (UL) and the Steel Tanks Institute (STI).

2) All single-walled, aboveground tanks have secondary containment with a volume greater than the capacity of the single largest container (except Steam Plant generator tank needs additional dike space). Secondary containment is provided by dikes and double-walled tanks. Drums are inside buildings, which provides containment for a spill and prevents oil from reaching a water body or storm drain.

3) There are no dikes or other containment structures that are impacted by storm water at this facility.

4) There are no underground storage tanks (USTs) at this facility.

5) There are no partially buried tanks at this facility.

6) Aboveground tanks will be inspected daily by personnel using them, except in case of the biodiesel facility. Since the biodiesel facility operates using a batch process, inspections will take place prior to operation. The tanks will be inspected once a month using a formal inspection checklist (Figure 2). A regular testing schedule will be established for all aboveground storage tanks, in accordance with appropriate industry standards.

7) There are no internal heating coils at this facility.

8) The waste-water discharged from this facility is mostly sanitary waste from residential, academic and administrative buildings and goes to the Bowling Green Municipal Utilities Publicly Owned Treatment Works (POTW). Western Kentucky University does not own or operate an effluent treatment facility.

9) Oil leaks which result in a loss of oil from tank seams, gaskets, rivets and bolts should be detected during the daily or monthly inspections. If a leak is suspected of reaching beyond the containment dike or double-walled tank/piping, either the Facility Response Coordinator or WKU Police (911) will be immediately notified.

10) This facility will make efforts to identify locations of portable oil storage (such as drums) and provide secondary containment with a capacity to hold the single largest container with freeboard for precipitation. At present all known drum staging locations are contained within buildings and all aboveground storage tanks have double-walls or dikes for containment.

Transfer Operations, Pumping and In-Plant Processes – 40 CFR 112.8 (d)

1) Buried piping is only present at the Steam Plant. The piping connects the tank to the generator outside the building and is about 30 ft. in length.

2) Aboveground pipeline is present at biodiesel facility and at the Transportation garage.

    a. At the biodiesel facility a one to one and half inch diameter pipe transfers biodiesel from the Wash tank to the Dispensing tank. This process is initiated via manual ball value by the operator and a pneumatic pump. The transfer of the finished product happens under the following conditions.
        - Only during Batch Processing (Small Batches)
        - Only when lab supervising personnel are present. (Operations of Batch processing)
        - When the pneumatic pump is unlocked.

        All other times the manual valve is in the "Off" position and the pneumatic pump will be unable to be energized for this process.

    b. At the transportation garage above ground piping is present for a 250 gallon crankcase oil tank. It has hoses which have failed in the past, but the oil was captured by the oil-water separator. Since the incident, as a corrective action, signage has been added to remind employees to turn off the compressed air after use.

3) Bollards and/or fencing are located around tanks to prevent vehicle-tank collisions.

CERTIFICATION OF APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

FACILITY NAME: ***Western Kentucky University***
FACILITY ADDRESS: ***Bowling Green, Kentucky***

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? Yes___ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? Yes___ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C – III to this appendix or a comparable formula) such that a discharge from this facility could cause injury to fish and wildlife and sensitive environments? Yes___ No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C – III to this appendix or a comparable formula) such that a discharge from this facility would shut down a public drinking water intake? Yes___ No X

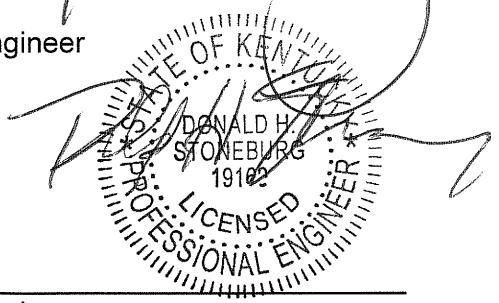
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? Yes___ No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in Western Kentucky University's Spill Prevention, Control and Countermeasure Plan-SPCC. For the purposes of 40 CFR 112, public drinking water intakes are analogous to the water systems as described at 40 CFR 143.26 and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

Engineer

12/3/10
Date



Seal

Figure1. SPCC Plan Review

As required by 40 CFR Part 112.5(b), "a review and evaluation of the SPCC Plan at least once every three years from the date such facility becomes subject to this part", is required by the operators of Western Kentucky University. If major changes to Western Kentucky University have occurred since the last review, the plan must be updated and re-certified by a registered Professional Engineer. If no amendment is necessary, the reviewers will indicate on the SPCC Plan that a review was conducted on a certain date, along with their signature and title – "No amendment is necessary as per 40 CFR Part 112.5(b)."

Name	Title	Signature
	Environmental Manager	
	Engineer	

Reviewed on: _____

The next review date will be: _____ (3 years later)

Figure 2. Storage Tanks Inspection Checklist

TANK LOCATION: _____

This inspection should be completed every month. Place an X in the appropriate box for each item. If any response requires additional elaboration, do so in the Descriptions and Comments space provided, or on a separate sheet of paper. If you answer YES on any question, describe the corrective action taken at the bottom of the page.

	YES	NO	CORRECTIVE ACTION
Tank surfaces show signs of leakage	_____	_____	_____
Tanks are damaged, rusted or deteriorated	_____	_____	_____
Bolts, rivets or seams are damaged	_____	_____	_____
Tank supports are deteriorated or buckled	_____	_____	_____
Tank foundations have eroded or settled	_____	_____	_____
Level gauges or alarms are inoperative	_____	_____	_____
Vents are obstructed	_____	_____	_____
Valve seals or gaskets are leaking	_____	_____	_____
Pipelines or supports are damaged	_____	_____	_____
Buried pipelines are exposed	_____	_____	_____
Loading/unloading area is damaged	_____	_____	_____
Connections are not capped/blank-flanged	_____	_____	_____
Secondary containment is damaged	_____	_____	_____
Dike drainage valves are open/damaged	_____	_____	_____
Fencing, gates or lighting is non-functional	_____	_____	_____
Check contents/serviceability of Spill kits	_____	_____	_____

Remarks:

_____

_____

_____ _____

Signature Date

Figure 3. Record of Spill Prevention Briefings

Briefings will be scheduled and conducted at intervals frequent enough to assure adequate understanding of the SPCC plan for Western Kentucky University. These briefings highlight known spill events or failures, malfunctioning components and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety and environmental issues encountered during operations.

Date:_____

Attendees: _____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Subjects and Issues: _____

_____

_____

Recommendations: _____

_____

_____

Figure 4. Dike Drainage Record

Standard Operating Procedure for Drainage of Rainwater from Diked Areas

Drainage of rainwater from diked areas is accomplished if:

1. The bypass valve is normally sealed closed.

2. Rainwater collected within the dike is inspected to ensure absence of oil. This inspection is in compliance with applicable water quality standards (40 CFR 110). In the event of oil present within the dike, the Facility Response Coordinator will be contacted.

3. In the event there is no oil present within the dike the bypass valve is opened and resealed under supervision, and the water is drained from the dike.

4. Records of such events are kept in the following format:

Location: _____

DATE	PRESENCE OF OIL	SEALED VALVE (Y/N)	SIGNATURE

Figure 5. Monthly Checklist Log

Storage Tank Site:

Inspection Item	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Date monthly check was conducted												
Date monthly check was submitted												
Tank surfaces show signs of leakage												
Tanks are damaged, rusted or deteriorated												
Bolts, rivets or seams are damaged												
Tank supports are deteriorated or buckled												
Tank foundations have eroded or settled												
Level gauges or alarms are inoperative												
Vents are obstructed												
Valve seals or gaskets are leaking												
Pipelines or supports are damaged												
Buried pipelines are exposed												
Loading/unloading area is damaged												
Connections are not capped/blank-flanged												
Secondary containment is damaged												
Dike drainage valves are open												
Fencing, gates or lighting is non-functional												
Check contents/serviceability of Spill kits												

NOTE: This monthly checklist log will be maintained by the Environmental Manager to document and track that the monthly inspections are taking place. A monthly checklist log will be maintained for each storage tank.

APPENDIX - A: FACILITY DIAGRAM

Facility Diagram revised in 2010: New buildings and tanks, etc. added.

Map is provided to each facility manager and available at DFM and DEHS offices.

APPENDIX - B: INCIDENTAL SPILL CONTROL AND CLEANUP PROCEDURES

When an oil spill occurs or is discovered make sure that you know the properties of that particular oil before attempting any kind of response. Information about the material is usually provided on labels. Pay extra attention to warning labels and NFPA numbers. The most important fact to note about any spilled oil is its flammability.

If the oil is not highly flammable, such as diesel, mineral oil, fuel oil or motor oil, then it should be safe to prevent it from spreading. Use the materials provided in the spill kit.

Keep people away from the spill and prevent smoking or any other source of flames or sparks from reaching the spill site. If you are in a closed room or building, open doors and/or windows to allow ventilation.

Prevent the oil from reaching drains, streams or sewers. Locate any drains that may be in the path of the flowing oil. Close them off using absorbent material like a boom or clay. Keep some distance between the edge of the drain and the absorbent material so that even if some oil slips through, you may have time to absorb it. If there is a stream nearby, try to divert the flow of oil away from the stream.

Close any open valves or holes through which the oil is spilling out. In case of a leaking drum lay it on its side with the leak on top. Plug the leak or provide support so that the drum does not roll away. It can be over-packed or plugged later, to enable transportation.

Lay the oil absorbent boom, which looks like a pipe or a long pillow, around the edge of the spill. If one boom is not long enough use more than one, making sure to overlap the ends of the two booms so there is no gap for the oil to slip through. Other absorbent materials like spill pads or clay can be piled up to prevent the oil from spreading quickly.

Do not leave the spill site until you have contained the spill and provided some signage or method of communicating the danger to others. Once the oil has been diverted from the storm drain and/or natural water body you may want to call for more help from your co-workers, if they are not already there.

Use absorbent material such as clay, spill pads, earth or paper towels to absorb the oil. Start from the outer edge and work your way inwards.

If you need more booms/clay/spill pads contact Facilities Management (5-3253) or EHS (5-2395).

Once all the oil has been absorbed collect or sweep the absorbent materials into a metal drum or buckets or any container that can eventually fit into a metal drum. For materials that are almost dry, you may use trash bags.

Call EHS for a waste pick-up or submit the on-line waste pick-up request form from the website:. http://www.wku.edu/Dept/Support/Legal/EHS/. Submission of the pick-up request to EHS to ensures proper disposal of all the absorbent materials used for cleanup.

APPENDIX C: OIL SPILL REPORTING PROCEDURE

Minor oil spills are spills that are less than 25 gallons in volume and do not involve a release to navigable waters of the United States. Such spills can be contained and cleaned-up by university employees and, should be reported to EHS. Call 5-2054 or e-mail Sharmila Pradhan (Sharmila.pradhan@wku.edu) to report a spill. EHS ensures compliance with state and federal oil pollution prevention regulations and should be informed about all spill incidents.

The following procedure should be followed in case of a major spill:

1. Call Western Kentucky University Police (911 or 5-2548) if the oil is going into a floor drain/water body or, if the spill volume is >25 gallons.

2. When reporting an oil spill try to provide information such as:
    a. location of the incident
    b. your name & contact number
    c. type and quantity of material discharged
    d. source or cause of the discharge
    e. any injuries or damage due to the oil spill (e.g. fire)
    f. action taken to stop or remove the effects of the oil spill.

3. Remain at the location until help arrives. You may be able to provide valuable information to the emergency responders.

4. The police dispatcher will follow the Chemical Incident Response Procedures to evaluate the situation and if required, initiate an oil spill emergency response by calling the Bowling Green Fire Department and the Facility Response Coordinator.

5. The Facility Response Coordinator will call the clean-up contractor and inform the Kentucky Division of Waste Management, Local and State Emergency Planning Commissions and the National Response Center, in the given sequence.

6. The Facility Response Coordinator will also inform EHS on the earliest working day following a release. EHS is responsible for preparing a written report and submitting it to the appropriate agencies within 30 days of a release of reportable quantity of oil.

CONTACT LIST

1.	WKU Police	911/ (270) 745-2548
2.	Bowling Green Fire Department	911
3.	Sharmila Pradhan Facility Response Coordinator	5-2054 (office) (513)255-5220 (cell)
4.	Larry Page, Alternate to FRC	5-6366 (office) / (270) 782-3316
5.	National Response Center	1-800-424-8802
6.	KY DWM Emergency Response Team	1-800-928-2380 or (502) 564-2380
7.	Warren County Emergency Management/LEPC	(270) 781-8776

CLEANUP CONTRACTORS

1.	First Response	615.868.9110
2.	Heritage	1-800-487-7475/ (502) 473-0638