FLAGLER COLLEGE

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Prepared By:
Triumvirate Environmental

Developed: October 2016

Program Approval

VP of Business Services	Date
Environmental Health and Safety Manager	Date
Risk Manager	Date

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Prepared by:
Triumvirate Environmental, Inc.
Initial - October, 2016

Reviewed and Approved by:
Triumvirate Environmental
Flagler College
Current Review Date; July 2018

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Flagler College
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
(40 CFR Part 112)

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1.0 INTRODUCTION AND PLAN CERTIFICATION

1.1 Introduction

As required by the Clean Water Act, the United States Environmental Protection Agency (USEPA) established Oil Pollution Prevention Regulations, which are codified in 40 CFR Part 112. These regulations establish procedures, methods, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States (U.S.) or adjoining shorelines.

These regulations apply to owners/operators of facilities engaged in storing, processing, transferring, distributing, using, or consuming oil and oil products, including gasoline, and other activities, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon navigable waters of the U.S.

Facilities are subject to the federal Oil Pollution Prevention regulations if:

1. The underground storage capacity of the facility is 42,000 gallons of oil or greater, or

2. The aggregate aboveground storage capacity of the facility is 1,320 gallons or greater of oil.

Flagler College is subject to these regulations based upon the quantities of oils stored at their facility.

Flagler College is located at the following address:

Flagler College
74 King Street
St. Augustine, FL 32084

Flagler College stores approximately **5,560 gallons** of oil in containers and/or aboveground and underground storage tanks (ASTs and UST) in various buildings throughout the facility. Since the facility's aboveground volume exceeds the regulatory threshold volume and since there is potential, although limited, for an oil spill to reach a "water of the United States", a SPCC Plan has been prepared and implemented. The plan is maintained in the Environmental, Health, and Safety office.

1.2 Self-Certification (§112.6(a)(1))

The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

I _____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 n §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 Section 1.3.3.
3. Optional 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.

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.

Name: _____ Title:_____

Signature: _____ Date:_____

1.3 Plan Review and Amendments (§112.4, 112.5(a)(b)(c))

1.3.1 Oil SPCC Plan Amendments Required by the U.S. EPA

In accordance with 40 CFR Part 112.4, the Regional Administrator (RA) of the US EPA may require the amendment of this Oil SPCC Plan if:

1) The facility has a discharge exceeding 1000 gallons of oil in a single discharge, or

2) If more that 42 gallons of oil are discharged in each of two discharges occurring within any 12-month period.

If either of these two events occurs, Flagler College must submit information specified in the regulation to the RA within 60 days.

1.3.2 Oil SPCC Plan Amendments Required in the Event of a Material Change

In accordance with 40 CFR Part 112.5(a) this Oil SPCC Plan will be amended "when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge into or upon navigable waters of the U.S." Changes that may require amendment of the plan include, but are not limited to:

- Commissioning or decommissioning containers;
- Replacement, reconstruction, or movement of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures;
- Changes of product or service; or
- Revision of standard operation or maintenance procedures.

Amendments to the plan will be prepared within six months and implemented as soon as possible, but not later than six months following plan amendment.

1.3.3 Oil SPCC Plan Review & Evaluation

In accordance with 40 CFR 112.5(b), a review and evaluation of this Oil SPCC Plan will be conducted at least once every five years from the date of the last review. Flagler College will amend the Oil SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) if such technology has been field-proven at the time of the review, and (2) if such technology will significantly reduce the likelihood of a spill event from the facility.

The amendment will be implemented as soon as possible, but no later than six months following the amendment of the plan.

The review and evaluation of the Oil SPCC Plan originally prepared October 2016 will be documented and a statement signed as to whether the Plan will or will not be amended, as follows:

"I have completed a review and evaluation of the Oil SPCC Plan for Flagler College on the date(s) below, and will (will not) amend the Plan as a result"

Review Date	Amendment	Signature
1/14/2017	Adjustments to equipment information, minor value changes and other minor information	Travis Nierendorf
12/20/2017	Map Adjustments, minor gallonage adjustment	Travis Nierendorf
2/2/2018	Adjusted inspection sheets	Travis Nierendorf
7/5/18	Adjusted phone #s, manager title	Travis Nierendorf

All technical amendments will be certified by a registered Professional Engineer.

1.4 Conformance with Regulatory Requirements (§112.7(a)(2))

Flagler College has developed this Oil SPCC Plan in accordance with the requirements of 40 CFR Part 112. As allowed by this regulation (112.7(a)(2)), alternative equivalent environmental protection provisions have been implemented where deviation from technical elements of the regulation have been necessary. The reason for each deviation and a description of the environmentally equivalent methods implemented are included within this plan.

1.5 Management Approval (§112.7)

Flagler College is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains the industry standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasure Plan.

Authorized Facility Representative:

_____	_____
Name	Signature
_____	_____
Title	Date

Authorized Facility Representative:

_____	_____
Name	Signature
_____	_____
Title	Date

Authorized Facility Representative:

_____	_____
Name	Signature
_____	_____
Title	Date

2.0 GENERAL SITE INFORMATION (§112.7(a)(3))

2.1 Facility Description

Flagler College is a private school located in the northeast section of Florida in the downtown area of St. Augustine. Originally built in 1888 as a luxury hotel by Henry Flagler, it reopened as a college in 1968. Following the founding of the college, Ponce de Leon Hall, the centerpiece of the landscape, later became nationally recognized as a historic landmark. The school sits on a vast 19 acre stretch of land with 28 buildings dedicated to classroom space, dormitories, dining halls, museums, athletic activities, and administrative use.

A facility site plan is provided in Appendix A which includes the locations of all oil storage containers with capacities equal or greater than 55-gallons and the types of oil stored.

2.2 Evaluation of Potential Discharge

Surface drainage flows in a multidirectional discharge network. Storm drains are connected to a municipal collection system and discharge to the bay but are equipped with a weir. The nearest bodies of water are the San Sebastian River, located within one mile of the site and the Atlantic Ocean, located within 4 miles of the site.

2.3 Spill History (§112.4(a))

There have been no releases of oil to the environment during the past 5 years.

3.0 SPCC PLAN OVERVIEW (§112.7(a)(3))

3.1 Facility Information

Name of Facility: Flagler College
Type of Facility: Private College
Location of Facility: 74 King Street, St. Augustine, FL 32084

Name and address of owner or operator:

Flagler College
74 King Street
St. Augustine, FL 32084

Designated person accountable for oil spill prevention at the facility:

Name	Title	Office Phone Number	Cell Phone Number
Victor Cheney	Superintendent of Physical Plants	904.819.6213	904.814.4516

Alternate person accountable for oil spill prevention at the facility:

Name	Title	Office Phone Number	Cell Phone Number
Travis Nierendorf	EHS Manager	(904) 819-6422	(860) 803-6914

3.2 Oil Storage

Oil storage facilities are located throughout various locations on campus. The facility site plan presented in Appendix A identifies the location of these facilities on the property. The stored oil and oil products include the following:

- Restaurant operations/ Food Grade Oil
- Diesel fuel for emergency generators;
- Hydraulic fluids for equipment such as elevators;
- Transformer oils (owned by Florida Power and Light);

Types of Oils Stored and Storage Volumes

The table below identifies the types of oils and oil products located at Flagler College and their approximate total volumes. Aboveground storage totals include all oil types and sizes of tanks and containers with a capacity of 55 gallons or greater.

Product	Aboveground Storage (gallons)	Underground Storage (gallons)
Diesel Fuel Oil	1600	3000
Hydraulic Oil	840	N/A
Food Grade Oil	120	N/A
Total	**2,460**	**3,000**

Oil is stored at a variety of locations onsite. Oil storage locations, tank/container sizes, and the predicted flow rate and direction of any releases are presented in Appendix B. All procedures and equipment are fully operational.

The total volume stored is below the threshold for a Facility Response Plan as documented in the Applicability of Substantial Harm Criteria, Appendix C.

3.3 Flagler College Policies on Oil Storage, Spill Prevention, and Spill Containment (§112.7(a)(3)(i-v))

Flagler College has instituted policies for proper oil storage, mitigation of the impact of any spills, and spill response for the facility. To achieve Flagler College's primary goal to prevent the occurrence of spills at the facility, specific procedures have been developed and implemented. Flagler College supplements this spill prevention initiative with a philosophy that should a spill event occur, the primary means to stop a release is to contain the material within the immediate area of the occurrence. For this reason, Flagler College's oil management system has also established several spill containment procedures for implementation in the event a spill should occur. The specific policies and procedures described in this plan are designed to provide spill prevention and containment at Flagler College.

3.3.1 Container and Drum Storage

The general strategy for preventing releases from Flagler College facilities is to handle containers and drums properly, and, where needed, to contain a spill in the general area where the material is stored. The following policies have been instituted:

- Drums of oil are properly labeled and stored upright on a spill pallet.
- Containers of oil are to be properly handled and transported by trained personnel.
- Oil storage containers equal to or greater than 55-gallons storage capacity are stored in secondary containment (or are otherwise contained), so as to provide

at least 100% containment of the largest container volume in case of a leak or rupture.

- Spill equipment (absorbent material, spill containment equipment) is maintained at oil and loading/unloading storage areas throughout the campus. Similar materials are available at or near elevators and electrical rooms in which oil-filled equipment is located.

Spill prevention measures taken by Flagler College are selected based on site-specific conditions, taking into consideration the practical application of a physical means of containment or engineered structure (e.g., berms, dikes, etc.) and the relative potential for spills or releases. Secondary containment is provided for bulk storage containers. Details of secondary containment inspection and spill prevention equipment and materials are included in Appendix D.

3.3.2 Aboveground Tanks and Containers

There are 12 aboveground oil storage tanks and containers (including tanks, drums, and elevators) throughout the Flagler College's facilities. A list of these tanks and containers, and their contents and locations is included in Appendix B of this plan.

The general strategy for preventing releases is to contain any spill of oil in the general area until such time as the material can be removed. The following procedures have been established:

- In rooms or outdoor areas with existing storage tanks near open floor or storm drains, or sensitive receptors, the drains are permanently plugged, capped or covered, if possible; or temporarily covered during refilling operations.

- Containment measures, such as the placement of curbs, berms, or spill pillows at doors or other exits, are used to contain spills within the rooms in which they occur.

- The EHS Department and Facilities Department inspects all tanks and oil containing equipment on a monthly basis and documents the inspections. The EHS Manager reviews all inspection logs. (See Appendix D)

3.3.3 Underground Tank

Flagler College has 1 underground storage tank(s) containing 3000 gallons of diesel fuel used for emergency day tanks. The tank is equipped with a state-of-the-art monitoring system by the manufacturer, KC Petroleum, which continually monitors the system for leaks. Guardian Fueling Technologies and Tanknology also have provided system upgrades, maintenance and testing over the last year. The EHS Manager or designee inspects and documents the tank's monitoring system on a monthly basis. The installation and correct use of this equipment greatly reduces the chances of an undetected leak.

The policies and procedures for refueling this tank are included in Section 8.

3.3.4 Hydraulic Equipment

Hydraulic oil-containing elevators are located in several buildings within Flagler College. The elevators are operated and maintained by an outside contractor. The elevators are inspected on a monthly basis. Spill kits are nearby in the event of a spill. A list of these locations is included in Appendix B of this Plan.

3.3.5 Oil Containing Equipment and Machinery

Flagler College currently has __15__ above threshold oil-filled electrical transformers located on-site which are owned by the local utility company, Florida Power and Light. There are about 2 dozen transformers on Flagler College's properties that are below 55 gallons as well. Flagler College is not responsible for maintaining these transformers owned by Florida Power and Light.

A description of these units is included in Appendix G of this plan. As a best management practice, all oil-filled transformers on Flagler College property are included in a program of regular inspections described in Section 9.0 of this plan. Although they are not to be specified in the SPCC plan and location map, they are going to be regularly inspected for structural integrity and any noticeable changes will be reviewed and reported to Florida Power and Light. Florida Power and Light is fully responsible for the maintenance and any spill releases from the transformers, per the letter in Appendix G.

3.3.6 Disposal of Spill Clean-Up and Recovered Materials

Materials collected during spill response and clean-up will be managed and disposed of in accordance with applicable state and federal regulations.

4.0 POTENTIAL SPILLS - PREDICTION AND CONTROL (§ 112.7(b) & (c))

Per subsection 112.7(b) of the federal regulations, this plan identifies locations where experience indicates that a reasonable potential for equipment failure exists. The regulation requires that the plan include a prediction of the flow direction, rate of flow, and total quantity of oil that could be discharged from the facility as a result of such a failure. Subsection 112.7(c) further states that containment and/or diversionary structures or equipment to prevent discharged oil from reaching a navigable watercourse should be provided.

Appendix B lists the locations where oil is stored and where spill events could occur, indicates stored oil volumes, estimates potential flow rates and direction, and lists the containment and/or diversionary structures or equipment that are used to prevent discharged oil from reaching a surface water. The information is listed based on the tank/container location.

5.0 FACILITY DRAINAGE (§ 112.8(b))

5.1 Drainage Systems

Drainage from the oil storage areas at this facility is best discussed by differentiating indoor and outdoor drainage systems.

Indoor Drainage Systems

When practicable, Flagler College makes every effort to store and handle oil within contained areas or with secondary containment. Oil is stored in various buildings at Flagler College. At this time, all oil storage tanks and containers, with the exception of the _15__ oil-filled transformers, equal to or exceeding 55 gallons have secondary containment. Physical containment of and response procedures to potential oil releases will greatly reduce, if not completely prevent, oil from reaching the outside environment. Floor drains near any oil tanks or containers have been permanently plugged.

Outdoor Drainage Systems

The majority of oil storage tank bulk containers and delivery areas are not adjacent to navigable waterways or storm drains.

During periods of wet weather flow, there is a possibility that oil spills to storm drains could reach a local surface water body and be considered a reportable spill incident by federal definition.

Aboveground storage tanks are located on concrete or asphalt surfaces or within buildings with concrete floors, and in nearly every case, for those containers that have total capacity equal to or greater than 55 gallons, are double walled or have secondary containment. Therefore, no need exists to have diking around tank/container storage areas, and storm water is not collected.

6.0 BULK STORAGE TANKS/CONTAINERS (§ 112.8(c))

"Bulk storage container" is defined in the regulations as *any container used to store oil except oil filled electrical, operating, or manufacturing equipment*. For purposes of this plan, the terms "tank" and "container" are used interchangeably. Oil storage tank inventories for Flagler College are provided in Appendix B. There are aboveground storage tanks or containers (including hydraulic elevator tanks) at the facility. Absorbent materials are stored in close proximity. None of the tanks are equipped with internal heating coils.

6.1 Tank Materials and Construction (§ 112.8(c)(1))

Aboveground storage tanks are steel painted with a rust resistant coating. These are compatible with the material stored within them and with other conditions of storage.

6.2 Secondary Containment (§ 112.8(c)(2))

The UST is double walled and equipped with leak detection systems consisting of interstitial monitoring devices and high level alarms. The UST is a completely buried tank and is in full compliance with the applicable UST technical requirements of 40 CFR Parts 280 and 281.

Many of the ASTs are within buildings or are double walled, which provide sufficient secondary containment. The types of secondary containment for all ASTs are listed in Appendix B. Dikes containing tanks do not have drains.

Flagler College's oil delivery contractor performs oil deliveries in compliance with U.S. Department of Transportation (DOT) regulations. The oil delivery contractor maintains absorbent pads and spill containment materials on each oil delivery truck. The delivery contractor is also responsible for providing oil absorbent booms or socks under each loading pipe to prevent spillage or leakage of oil into the environment.

6.3 Buried or Partially Buried Metallic Tanks (§112.8(c)(4)&(5))

There are no partially buried metallic storage tanks at Flagler College.

6.4 Aboveground Storage Tank Integrity Testing Schedule (§112.8(c)(6))

Federal oil pollution prevention regulations set forth in 40 CFR Part 112 require regular visual inspection as well as integrity testing of aboveground oil storage tanks/containers on a regular schedule. Each of the aboveground storage tanks at Flagler College have been assessed to determine the most appropriate integrity testing methods.

In order to comply with this requirement Flagler College has implemented measures equivalent to the requirements of 112.8 (c)(6) by adhering to the provisions of the Steel Tank Institution Standard SP001, Inspection of Aboveground Storage Tanks**.** This standard is hereafter referred to as STI Standard SP001. The standard establishes methods and procedures for the inspection of storage tanks based on the risk of release to the environment with consideration to spill control methods and release detection engineering of the tanks.

Flagler College currently stores oil in aboveground containers ranging in size from 55 gallons to 550 gallons. Tanks less than 5,000 gallons shell capacity or do not fall under "Category 3" tank specifications which are specific to aboveground storage tanks without spill control and without continuous release detection monitoring, therefore non-destructive shell testing is not applicable in accordance with the STI Standard SP001 standard. This is discussed in greater detail in the following paragraphs.

55 Gallon Drums

In accordance with Table 5.5 "Table of Inspection Schedules" of the STI Standard SP001, "Portable Containers" are only subject to monthly visual inspections whereas no formal shell integrity testing is required. Furthermore, in accordance with clarification provided by U.S. EPA Region I, U.S. Department of Transportation (DOT approved 55gallon drums in good condition are not subject to integrity testing as they are already in conformance with required industry standards.

Accordingly, Flagler College has adopted the environmentally equivalent practice of using only UN Rated [DOT approved] shipping containers for the storage of oil in quantities of ≤ 55 gallons. This standard practice is addressed within the annual training provided to all oil handling personnel.

Small Storage Tanks (0 to 1,100 Gallon Capacity)

Testing is not required for the small storage tanks as long as the inspections are being performed (see Section 9.0).

6.5 Container Installations – Good Engineering Practices (§112.8(c)(8))

All above and below ground tanks are equipped with a type of Overfill Protection Device (OPD) such as liquid level indicators or vent whistles, or the liquid level can be observed while filling the container (e.g., drums, elevator reservoirs, etc.); storm drains are protected when tanks are being filled. Specifically:

- The 3000-gallon underground storage tank(s) is/are equipped with a Veeder-Root monitoring system by KC Petroleum that continually monitors the system for leaks and contains an OPV, (40 CFR 112.8(c)(8));
- Aboveground tanks have liquid level indicators, vent whistles and/or are observed during filling.

Where OPDs are not practical (e.g., 55-gallon drums), observation of container filling in lieu of an OPD, is an acceptable means of providing alternative measures for equivalent environmental protection in accordance with 112.8(c)(8).

6.6 Facility Wastewater Discharges (§ 112.8(c)(9))

Sanitary wastewater is discharged to the local Publicly Owned Treatment Works (POTW) through the sanitary sewer lines. By implementing containment procedures, providing secondary containment within indoor oil storage areas, and/or by maintaining a readily available supply of

absorbent materials in such areas, Flagler College minimizes the potential for oil spills to reach the local sewer system, and therefore navigable water.

6.7 Visible Oil Leaks and Mobile Oil Storage Tanks (§112.8(c)(10)&(11))

Upon discovery, oil leaks that could result in a loss of oil from tank seams, gaskets, rivets and bolts, are promptly corrected by the Facilities/Maintenance Department.

Leaks are corrected by Facilities/Maintenance Department personnel on an as-needed basis and both written and verbal reports are submitted to the EHS Manager or the Superintendent of Physical Plants. The individual who detects the leak initiates repairs or calls for a work order. Spill equipment is nearby in the event of a release.

In the event that portable or temporary oil storage containers are used by Flagler College, either active or passive means of secondary containment would be provided. In accordance with the regulation, secondary containment would be required to provide 100% containment of the largest container volume plus sufficient freeboard for precipitation (outdoor storage only).

7.0 TRANSFER OPERATIONS, PUMPING AND IN-PLANT PROCESSES (§112.8(d))

The principal transfer operations taking place at Flagler College involves the transfer of oil from delivery trucks to aboveground and underground tanks and from the containers to its point of use. In addition, Flagler College transfers products from containers on an as-needed basis. Oil is pumped from the oil storage tanks by various pumping and pipeline systems to its point of final use. No aboveground oil pipes are located where vehicles could cause damage, therefore, no warning is provided to vehicle operators to avoid aboveground lines.

7.1 Buried Piping (§ 112.8(d)(1))

Buried piping that is installed or replaced will be provided with a protective wrapping and coating. Flagler College has both underground and aboveground piping systems. All accessible aboveground systems are visually inspected on a monthly basis as part of the tank inspection procedures (see Appendix D). Underground piping has undergone integrity testing. Buried piping systems are visually inspected whenever they are exposed.

7.2 Out-of-Service Pipelines (§112.8(d)(2) & 112.7(g)(4))

Flagler College currently does not have any out-of-service pipes. However, when pipelines are not in service or are in standby mode for an extended period of time, the connection at the transfer point is capped and marked as to its origin.

7.3 Pipe Supports and Aboveground Pipelines and Valves (§112.8(d)(3) and (4))

Oil transfer pipeline supports have been designed and constructed to minimize abrasion and corrosion and allow for expansion and contraction. The EHS Manager and Facilities Management Department visually examines the aboveground pipelines, valves, and pipe supports on a monthly basis. These inspections are documented and records kept on file. The double walled pipelines will undergo pressure / integrity testing on an annual basis by a certified technician.

The EHS Manager reviews all inspection reports. Integrity testing of ASTs is performed in accordance with Section 6.4 of this plan

8.0 TANK TRUCK LOADING AND UNLOADING (§112.8(d) and 112.7(a)(3))

Tank truck unloading at Flagler College consists primarily of bulk deliveries of fuel oil to their respective aboveground and underground storage tanks. Contractors are required to follow Flagler College's established spill prevention guidelines. No loading racks are present at Flagler College.

8.1 Department of Transportation Regulations

An independent fuel oil delivery contractor, under contract with Flagler College, performs tank truck unloading. The unloading procedures implemented by the carriers meet the minimum requirements and regulations established by the DOT. (49 CFR 177.834 and 177.837).

8.2 Oil Delivery Procedures

The following are Flagler College's oil delivery guidelines. These guidelines are communicated to contractors selected by Flagler College for fuel delivery service.

Delivery procedures implemented by the outside oil delivery contractors meet the minimum requirements and regulations established by the DOT. Absorbent materials and spill containment materials are present on each delivery truck and utilized in the event of a spill event. Flagler College requires the oil delivery contractor to use drip trays under all fill pipes to catch spills or leaks that would otherwise reach the environment, this is especially important when the ships are being fueled. The contractor is present during delivery and has the proper spill equipment in the event of a spill during fueling.

Where installed, overfill alarms are used to prevent overfilling of tanks. The delivery contractor is always present throughout the filling process. Deliveries are always monitored by Flagler College personnel to ensure fueling is performed properly and without incident. Fuel oil delivery is permitted at the designated location during regular business hours, with prior notice of delivery to the Superintendent of Physical Plants or the EHS Manager.

Tank truck unloading procedures meet the minimum requirements and regulations established by the DOT. In particular, the following procedures are observed during the filling of all bulk ASTs and UST:

1. No smoking is allowed within 50 feet while unloading oil.
2. The delivery truck driver is to remain with the vehicle at all times while unloading.
3. Each delivery of oil is supervised by the delivery truck driver and a trained Flagler College employee. Throughout the process, each person must be alert, have unobstructed view of the delivery truck and the storage tank, as well as being within 25 feet of each. Unless the delivery truck's engine is to be used for operation of the pump, no oil shall be unloaded while the engine is running.
4. The facility representative will ensure that the wheels of the delivery truck are blocked/chocked and that drip pans or oil absorbing pads are placed beneath all hose connections that might be prone to leakage.

5. Unloading operations are to be performed only in areas designated for that purpose.

6. The unloading operation is not to begin before the level in the tank is checked and it is verified that the tank has sufficient capacity to receive the volume of oil to be transferred.

7. The drain valve on the truck is to be closed, and the unloading line is to be drained back to the tank before disconnecting the unloading line.

8. Prior to departure of the delivery truck, the lower most drain and all outlets are closely examined for leakage, and if necessary, tightened, adjusted or replaced to prevent any liquid leakage while in transit.

9. Any leakage or spillage must be immediately reported and including quantity, by dialing EHS Manager, Travis Nierendorf at 904-819-6244 during business hours or 860-803-6914 if off hours. If no response, call Security at 910-819-6200

These procedures shall be reviewed during all annual SPCC trainings for Flagler College oil handling personnel.

9.0 INSPECTIONS AND RECORDS (§112.7(e))

Aboveground oil storage tanks, oil containers, and oil-containing equipment are visually inspected on a routine basis by the Facilities Management Department to determine if there any leaks, spills or other deficiencies. Deficiencies are reported to the EHS Manager and the Superintendent of Physical Plants and corrected in a timely manner.

Inspection records of all tanks, containers, secondary containment, and emergency response items are maintained and reviewed by the EHS Manager. Inspection checklists are presented in Appendix D. All records are signed by the appropriate supervisor and kept on file for three years. The Facility Self-Inspection records are kept on file for five years. Spills, leaks and/ or other problems discovered are reported and promptly corrected. Incident logs for various types of spills are maintained by the EHS Manager. Flagler College incident reports are completed for spills of oil to a storm drain or surface water, in the event they occur**.** A Release Notification Form is included in Appendix E.

All records and the Oil SPCC Plan are maintained by the EHS Manager.

10.0 SECURITY (§112.7(g))

Flagler College maintains a security staff that monitors access to the property. Site security is maintained 24 hours per day, 7 days per week, 365 days per year. Security rounds are conducted on all shifts and security is augmented through the use of surveillance cameras.

Flagler College therefore has elected to adopt environmentally equivalent security methods to satisfy the rule's security requirements. The vast majority of oil storage and handling occurs within secured areas of Flagler College buildings which prevent unauthorized access to these locations. These locations are secured with locked doors at the entrances. Any unusual environmental conditions detected are immediately reported to Security. Lighting provided in and around the facilities is sufficient to provide for the observation of spills during hours of darkness and to deter acts of vandalism that could otherwise result in oil spills. Outdoor oil storage is not readily accessible to acts of vandalism.

To provide security and contingency management, all fuel deliveries are monitored by Flagler College operating personnel in accordance with the strict delivery procedures identified in section 8.2 of this plan. The delivery of fuel is monitored and the fuel directed to proper tanks, while monitoring fueling rate and pressure. During all other times the fill ports shall be secured with a lock mechanism to prevent tampering by unauthorized persons.

11.0 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES (§112.7(f))

Flagler College's training program as described below has been implemented as part of this SPCC Plan.

Flagler College provides training to new oil-handling personnel involved with the operation and maintenance of equipment to prevent the discharge of oil. Additionally, annual training is provided to all oil-handling personnel. Training elements include:

- discharge procedure protocols;
- applicable pollution control laws, rules, and regulations;
- general facility operations; and,
- The contents of the facility's Oil SPCC Plan.

Flagler College will include discharge prevention briefings for oil-handling personnel during the annual training to highlight and describe known discharges as described in 40 CFR 112.1(b), or failures, malfunctioning components, and recently developed precautionary procedures.

Flagler College personnel responsible for overseeing and responding to oil spills at the facility are provided with appropriate hazardous materials spill response training and precautionary measures. Documentation of all such training will be maintained in the EHS office files.

At Flagler College, the EHS Manager and/or Vic Cheney is the designated person accountable for oil spill prevention.

12.0 SPILL RESPONSE/NOTIFICATION PROCEDURES (§112.7(a)(4))

This section details the response and notification procedures that are to be implemented in the event of any oil spill from Flagler College's campus that has the potential to reach navigable waters.

12.1 Immediate Response/Notification

Upon discovery of a spill or leak, personnel are instructed to stop the discharge to the extent possible (considering health and safety issues). They are instructed to take immediate measures (such as deploying spill containment pillows) to contain the spill in the immediate area and prevent the oil from reaching a floor drain or storm drain, or navigable waters.

After taking initial containment measures, the person discovering the spill must call the **Facilities Management Department at 904-819-6213** or the **EHS Department at 904-826-8533**, and provide the following information:

- Location, date, and time of release
- An assessment of the potential for the release reaching a catch basin, floor drain, or release to the sewer, or discharge over land to a navigable waterway, wetland or other sensitive receptors
- Type of oil released
- Approximate quantity of oil released
- Source of release
- Description of release
- Name and telephone number of the responsible person in the area where the release occurred
- Description of immediate response actions taken
- Any other information, including potential environmental impacts, that is relevant to assessing the degree of the hazard posed by the release

The Superintendent of Physical Plants or designee contacts the Response Contractor as necessary. In the event of a spill where the Response Contractor is contacted, the Response Contractor will provide professional services for the containment, removal, and disposal of all contaminated material.

For spills that have reached or have the potential to reach a floor drain, catch basin, sanitary or storm sewer, or another sensitive receptor, notification of appropriate regulatory agencies will be made as soon as possible by the Superintendent of Physical Plants or designee as outlined below.

A record of all calls will be logged at the Facilities Management Department office for compliance notification.

12.2 Spill Notification and Reporting (§112.7(a)(3)(vi))

If a reportable quantity (as defined by federal and state regulations) has been released, the agency contacts listed under the respective scenarios will be notified by telephone. The below table contains a list of outside responders and agencies that may need to be notified of an oil spill to the environment.

Authority	Notify	Telephone
City of St. Augustine Fire Department	To Report a Fire, Environmental Emergency	(904)825-1099 or 911
FL Department of Environmental Protection (Main)	Environmental Emergency	(850)245-2118
National Response Center	Environmental Emergency	(800)424-8802
US Environmental Protection Agency Regional Administrator (Region IV)	Environmental Emergency (report to FL DEP first)	(404)562-9900
Ambulance/Medical Emergency	Medical Emergency	911
Florida Water Management District	Spill to Sewer	(386)329-4500 (800)451-7106
St. John's County WWTP	Reportable Discharge	(989) 224 -8931
Triumvirate Environmental Emergency Response	Oil Spill Clean-Up / Site Management	(407)859-4441

The personnel providing notification should be prepared to offer the following information:

- Identification of the caller;
- Contact phone number;
- Location of spill;
- Type of product spilled;
- Quantity spilled;
- Extent of actual and/or potential water pollution;
- Date and type of spill; and
- Cause of spill.

Following completion of initial response and notification activities Facilities Management Department personnel will restock emergency equipment, restore the impacted area and properly manage contaminated debris as necessary.

12.3 Federal Requirements for Oil Spill Reporting (§112.4(a))

Under 40 CFR Part 110, the National Response Center (NRC) must be contacted immediately if a discharge of oil reaches waters of the United States. Discharges of oil must be reported if they "cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines."

The USEPA must be contacted immediately if a discharge of more than 1,000 gallons in a single discharge or more than 42 gallons in each of two discharges occur within any 12-month period, or if oil reaches a navigable waterway or adjoining shoreline. The following information is required to be submitted to the Regional Administrator of Region IV within 60 days (40 CFR 112.4(a)):

1. Name of facility;
2. Name(s) of the owner or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures that were 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(s) of such discharge, including a failure analysis of system or subsystem in which the failure occurred;
8. Additional preventive measures 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.

Copies of this report should be sent to the following address:

U.S. EPA Region 4
U.S. Environmental Protection Agency
Region 4- Southeast
61 Forsyth Street
Atlanta, GA 30303

12.4 State Requirements for Oil Spill Reporting (F.A.C. 62-780)

The Florida Department of Environmental Protection (FDEP) requires notification in the event of:

1. A spill or release of oil that creates a sheen on a surface water, or
2. Oil Spills greater than 25 gallons (or potential > 25 gallons) enters the environment, or
3. Oil Spills requiring any state/federal notifications or assistance
4. All spills threatening population or the environment
5. Chemical Spills regarding all SARA/EHS/CERCLA releases
6. All spills requiring evacuation

For spills or releases resulting in a sheen or exceeding the RQ in a 24-hour period, FDEP notification must be made within 2 hours of spill/release discovery. The State Watch Office may also be called at 1.800.320.0519.

A Discharge Reporting Form must be submitted to the FDEP within 60 days of the release to the below address. A copy of the Discharge Reporting Form is included in Appendix E.

FL DEP
3900 Commonwealth Blvd. M.S. 49
Tallahassee, FL 32399

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Appendix A - Facility Site Plan

Appendix B - Oil Storage Inventory, Spill Prediction and Impacts Assessment

Appendix C - Applicability of Substantial Harm Criteria

Appendix D –

- **D-1 - AST and Piping Inspection Checklist**
- **D-2 - All current SPCC Inspection Sheet Templates**

Appendix E – Discharge Reporting Form

Appendix F - Regulatory Cross Reference

Appendix G – Florida Light and Power Letter