

**SPELL PREVENTION, CONTROL,  
AND  
COUNTERMEASURES  
PLAN**

**ST. MARY'S COLLEGE OF  
MARYLAND  
18952 EAST FISHER ROAD  
ST. MARY'S CITY, MD 20686**

**June 2010**

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**SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN**  
**FOR**  
**ST. MARY'S COLLEGE OF MARYLAND**  
**ST. MARY'S CITY, MD**

**1.0 Certification [40 CFR 112.3(d)]**

I hereby certify that I have visited and examined St. Mary's College of Maryland (St. Mary's), and being familiar with the provisions of this Spill Prevention, Control, and Countermeasures (SPCC) regulations codified at 40 Code of Federal Regulations (CFR) Part 112 *et seq.* (40 CFR 112) and this SPCC plan, attest that this carefully thought-out SPCC plan was prepared in accordance with good engineering practices, including consideration of applicable industry standards and with the requirements of 40 CFR 112. Procedures for required inspections and testing have been established and this plan is adequate for this facility. Amendments subsequent to the date of this certification must be documented and certified, separately, by a Registered Professional Engineer as described in Section 2.0 of this plan.

Certifying Engineer: Laurence T. Brand, P.E.  
Maryland Registration No. 200404  
Air, Land and Water Engineering, Inc.  
410-997-0395

Signature: \_\_\_\_\_

Certification Date: \_\_\_\_\_

Engineering Seal:

**2.0 Review [40 CFR 112.5]**

This plan will be reviewed and evaluated at least once every five years and within six months of a change in facility design, construction, operation, or maintenance that materially affects St. Mary's spill potential. In response to the reviews, the SPCC plan will be amended within six months of the review date to include more effective prevention and control technology, if that technology has been proven in the field and will significantly reduce the likelihood of a spill. Amendments to this SPCC plan will be reviewed and certified by a Registered Professional Engineer per 40 CFR 112.3(d) and 112.5(c).

**Review Date**

**Signature**

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**Amendment Date**

**Sections Amended**

**Signature**

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#### 4.0 Facility Owner and Operator Information

Facility Name	St. Mary's College Of Maryland
Facility Type	College Campus
Facility Location and Mailing Address	18952 East Fisher Road in St. Mary's City, MD 20686
Hours of Normal Operation	24 Hours/day 7 Days/week
Facility Phone Number Working Hours	800-492-7181
Owner/Operator	State of Maryland
Location of SPCC Plan [40 CFR 112.3(e)]	Environmental Health and Safety Office
Drainage Basin	Saint Mary's River
Nearest Surface Water	St. Mary's River

## **5.0 Personnel Responsibilities and Organization**

The personnel responsible for implementing this SPCC plan are listed below. These persons are thoroughly familiar with the SPCC regulations and this SPCC plan and have overall responsibility for implementing this SPCC plan. They will maintain the records required under this SPCC plan and a copy of the complete current SPCC plan, as amended, for on-site review by EPA during normal working hours, as required by 40 CFR 112.3(e).

Ms. Polly Miller, Environmental Health & Safety Coordinator  
(240) 895-3059 (Office)  
240-256-0291 (cell)

Derek K. Thorton  
Assistant Vice President for Campus Operations  
(240) 895-4287 (Office)

They are responsible for developing the plan, providing staff training, record keeping, updating the SPCC plan, coordinating and managing spill response. They are also responsible for overseeing inspections, scheduling preventative maintenance, enacting good housekeeping programs, and preparing annual inspection reports.

It should be noted that none of St. Mary's employees are to be designated "first responders" for incidents involving hazardous materials, including petroleum products. As such, the responsibility for response will be delegated to the appropriate personnel of the hazardous materials unit of the local fire department for stabilization of the situation and then to the spill response contractor for cleanup.

## 6.0 Purpose of the Plan

In accordance with the SPCC regulations (40 CFR 112 *et seq.*), St. Mary's has prepared this SPCC plan, which has three purposes. The plan's first purpose is to **prevent** oil from being released into the environment. The second purpose is to **control** discharges of oil to prevent spills from reaching navigable waters. The third purpose is to minimize the impact of a spill of oil that has reached a waterway using **countermeasures**.

The SPCC regulations apply and require the preparation of a SPCC plan when a non-transportation-related facility has aboveground storage of 1,320 gallons total or underground storage of 42,000 gallons and a release from this storage could reasonably be expected to discharge oil in harmful quantities into navigable waters of the United States. In 40 CFR 110.3 and 112.2, the underlined terms are defined.

Based upon ALWE's review of the regulations and associated guidance and the parameters of St. Mary's, as supplied by St. Mary's personnel, ALWE concluded that St. Mary's is required to prepare and implement a SPCC plan [40 CFR 112.1], but is not required to submit the plan to the EPA Regional Administrator [40 CFR 112.4(a)]. If a release occurs, review the requirements of 40 CFR 112.4a to evaluate the necessity for EPA plan review.

ALWE concluded that St. Mary's is not a substantial harm facility and therefore not required to prepare and submit a Facility Response Plan (FRP) [40 CFR 112.20(f)]. Appendix E contains the *Certification That This Facility Does Not Pose Substantial Harm*, as required by Section 3 of Appendix C to 40 CFR 112

Appropriate personnel at St. Mary's will be trained in the elements of this plan, which is a reference document for St. Mary's personnel to use in the event of a spill and is intended to minimize releases and the ability of any releases to reach waterways. Any questions regarding this plan should be referred to Ms. Miller or Mr. Thorton. Training requirements are outlined in Section 11.10 of this plan.

## **7.0 Facility and Vicinity Information**

### **7.1 Facility Description**

The subject site is a college with academic, administrative, and residence buildings. The campus of St. Mary's is approximately 319 acres surrounded by the St. Mary's River, adjacent to historic St. Mary's City, Maryland. The college is located 75 miles from Washington, D.C., 70 miles from Annapolis, and 120 miles from Baltimore.

The subject site contains twenty underground storage tanks (USTs) for heating oil, motor fuels and some generator fuel supply, eight emergency generator belly ASTs, and multiple oil-filled electrical transformers/switches are included in the plan. No specific list of transformers was provided by the school to ALWE. A list should be appended to this plan. Additional ASTs for hydraulic elevators and day tanks are on campus, but are not included in the plan since they are located inside buildings and are not near a stormwater drain. The marina River Center also has one gasoline fueling AST. Used grease from the kitchen is stored near the loading dock area of the Campus Center building.

The approximate elevation of St. Mary's is 10 to 40 feet above mean sea level, with a fairly flat area across the campus. The local surface gradient in the area allows drainage into the Saint Mary's River to the northwest of the campus. Some of the stormwater drains run into Saint John's Pond which is centrally located on the campus. This pond drains into the Saint Mary's River.

Figures for this plan are located in the back of the document. The subject site is depicted on a site location map in Figure 1 and on a topographic map of the campus in Figure 2. Figure 3 shows the campus map with symbols that represent the locations of the USTs and ASTs on the campus. Figure 4 shows the location of the USTs and ASTs including a grease tank near the Campus Center and the Library. Figure 5 shows the locations of the two tanks next to the Athletics Center. Figures 6 through 10 show the specific locations of the other fuel ASTs on campus. Figure 11 shows the specific location of the gasoline AST at the River Center.

### **7.2 Facility Drainage**

Storm water inlets are located across the St. Mary's campus, collecting storm water, which is then routed into the Saint Mary's River or Saint John's Pond or one of the stormwater management

ponds that eventually drain into the river. It is anticipated that most spills at St. Mary's will migrate towards the Saint Mary's River.

### 7.3 Storage Areas and Capacity

Table 1, in section 9.0, list the tanks on campus. No portable oil storage areas or wastewater treatment plants are on campus. The EPA requires the general location of the USTs be shown on a campus wide map, but as long as the USTs are in compliance with State and Federal regulations, the main focus of the SPCC plan is on the ASTs on the campus. Maryland does not currently have specific SPCC regulations, but they do have UST and AST regulations.

The locations of St. Mary's ASTs are described below:

- Emergency generator tanks are located at various buildings on campus. Most of the emergency generator ASTs are approximately 150-gallon to 370 gallon double-walled "belly" tanks.
- Electrical oil-filled transformers are located across the St. Mary's campus. Most of the electrical transformers are assumed to be approximately 300-gallon, single-walled tanks with heat sink fins. These tanks are not shown on the drawings.
- St. Mary's also has a 250-gallon double-walled gasoline AST at the marina and one 500-gallon heating oil AST at the Cobb House.
- A grease tank is provided by Valley Protein and it is stored near the loading dock at the Campus Center building.

The locations of St. Mary's USTs are listed on Table 1 in section 9. ALWE performed a brief review of the files on campus and most of the USTs appear to be in compliance. An UST that had been removed from the vicinity of the Margaret Brent building had leaked and is currently an open case with the Maryland Department of the Environment (MDE). St. Mary's is cooperating with the MDE to resolve the case. The inspections of the USTs that are performed by third party inspectors have no open issues and the "failures" that were noted in the inspection reports ALWE reviewed were resolved according to Mr. Harry Sparrow.

Tank testing is performed as required by the regulations and a table that tracks the test frequency is maintained by the College. A copy of this table is located in Appendix F.

No field erected tanks are present on campus and therefore no brittle fracture evaluation is necessary.

Spill response equipment is staged at the trailer at the Physical Plant, as well as other locations on campus.

#### **7.4 Process Areas**

Vehicles and equipment are not maintained or repaired on campus therefore there are no waste oil tanks or process areas.

#### **7.5 Loading and Unloading Areas**

There are numerous delivery truck unloading areas at St. Mary's. The tanks are filled by trucks driven onto campus by outside contractors. The areas where the trucks park during filling are not dedicated and do not have secondary containment.

In each area where the trucks unload, St. Mary's will place containment booms and/or mats on and around the nearest downstream storm water inlet during unloading as necessary to prevent a spill from reaching a storm water inlet or stream. If there is no specific drain to cover a boom will be placed around the truck and AST on the downgradient side during delivery to capture spills that may occur. The specific procedures for the loading and unloading are included in Appendix C.

#### **7.6 Sewer System**

Storm water from St. Mary's is collected in numerous drop inlets and storm drains across campus and conveyed in an underground storm water system, which routes water into the river or a pond on the campus. A few stormwater management ponds are located on the campus.

St. Mary's sanitary sewage is routed via separate underground pipes to a publicly owned treatment work (POTW). No release to navigable waters is expected from the sanitary sewers.

#### **7.7 Vicinity Description**

The St. Mary's campus is bordered by farmland and undeveloped land, and the historic city of St. Mary's.

## 8.0 Spill History [40 CFR 112.7(a)]

With one exception, only minor releases of oil-containing materials have occurred at St. Mary's.

Approximately two years ago, a line leak in the Montgomery Hall boiler room was contained in the building. The spill was estimated to be about 400 gallons. The Calvert building also had a spill associated with a return line to an UST. No further information was available on this spill.

The exception was at the Margaret Brent building. This is an open case with the MDE and the college is cooperating with the MDE. Remedial activities are ongoing for this case. Soil and groundwater were impacted.

According to St. Mary's records, no spills to a waterway have occurred in the last twelve months.

## 9.0 Potential Releases [40 CFR 112.7(b) and (c)(1)]

The following table includes information on potential releases:

<b>Table 1: Potential Releases</b>					
<b>Tank Location by Building name</b>	<b>Type of Storage Tank</b>	<b>Total Approx. Volume * (Gallons)</b>	<b>Rate of Flow Gallons per minute (gpm)</b>	<b>Predicted Flow Direction of Spill (During Filling of Tanks or Spill From AST)</b>	<b>Containment (Gallons)</b>
ANNE ARUNDEL #2 Fuel	UST	6,000	~50 gpm during filling	East to point Lookout Road	NA -UST
ATHLETIC REC #2 Fuel	UST	10,000	~50 gpm during filling	Northeast to retention pond	NA -UST
CALVERT #2 Fuel	UST	10,000	~50 gpm during filling	Northeast down Trinity Church Road	NA -UST
CAMPUS CENTER #2 Fuel	UST	10,000	~50 gpm during filling	North to Library Parking lot then northeast to pond	NA -UST
CAROLINE #2 Fuel	UST	10,000	~50 gpm during filling	Southeast to storm sewer that leads into the stream that feed the St. John's Pond	NA -UST
COBB HOUSE #2 Fuel	AST	500	~50 gpm during filling	North to drive way then to Fishers Road then to the northwest to the River	<b>Double Walled AST</b>
DORCHESTER #2 Fuel	UST	10,000	~50 gpm during filling	East across road to storm drain that feeds into stream that feed the St. John's Pond	NA-UST

SPCC Plan – St. Mary's College of Maryland

DAUGHERTY-PALMER COMMONS #2 Fuel	UST	1,000	~50 gpm during filling	East across parking lot to storm drain that feeds into the stormwater pond south of the townhouse residences	NA- UST
KENT HALL #2 Fuel	UST	10,000	~50 gpm during filling	Southeast to street then northeast down street to storm drain inlet.	NA- UST
LEWIS QUAD #2 Fuel	UST	10,000	~50 gpm during filling	South to storm water drain. This drain likely leads to the pond in front of the townhouses.	NA-UST
LIBRARY #2 Fuel	UST	8,000	~50 gpm during filling	Northwest to storm water drain	NA-UST
MAINTENANCE Gasoline	UST	2,000	5-50 gpm during filling of tank or vehicles	Southwest to parking lot then to a storm drain and eventually to stream that feed the St. John's Pond	NA -UST
MAINTENANCE Motor Diesel	UST	1,000	5-50 gpm during filling of tank or vehicles	Southwest to parking lot then to a storm drain and eventually to stream that feed the St. John's Pond	NA-UST
Physical Plant #2 Fuel Furnace	UST	2,000	~50 gpm during filling	Southwest to parking lot then to a storm drain and eventually to stream that feed the St. John's Pond	NA- UST
MONTGOMERY HALL #2 Fuel	UST	20,000	~50 gpm during filling	North to nearby storm drain. This drain leads into stream that feeds the St. John's Pond	NA- UST
MONTGOMERY GENERATOR UST	UST	1,000	~50 gpm during filling	North to nearby storm drain. This drain leads into stream that feeds the St. John's Pond	NA- UST
PRINCE GEORGE #2 Fuel	UST	10,000	~50 gpm during filling	Southeast to storm sewer that leads into the stream that feed the St. John's Pond	NA- UST
QUEEN ANNE #2 Fuel	UST	10,000	~50 gpm during filling	North to storm drain. This drain flows west to river.	NA-UST
SCHAEFER #2 Fuel	UST	10,000	~50 gpm during filling	North to storm drain. This drain flows to the pond south of the town houses.	NA-UST
ST. MARY'S HALL	UST	1,000	~50 gpm during filling	Northeast to river	NA- UST
WHITE HOUSE #2 Fuel	UST	600	~50 gpm during filling	Spill near tank will flow east towards the pond	NA- UST
ATHLETIC REC. EMERGENCY GENERATOR	AST	150	150	Northeast to retention pond	<b>Double Walled AST</b>
CAMPUS CENTER EMERGENCY GENERATOR	AST	200	200	North to Library Parking lot then northeast to pond	<b>Double Walled AST</b>
KENT HALL EMG. GENERATOR	AST	150	150	North to grassy area from AST, or flow east to street then to storm drain from parking lot.	<b>Double Walled AST</b>
GOODPASTER EMERGENCY GENERATOR	AST	300	300	Remote fill located above grate. North to street to storm drain. To pond in front of town houses.	<b>Inside building</b>
LEWIS QUAD EMERGENCY GENERATOR	AST	300	300	South to nearby storm drain across parking lot. This drain likely leads to the pond in front of the townhouses.	<b>Double Walled AST fueled from the nearby UST.</b>



SCHAEFER EMG. GENERATOR	AST	200 Vol. On metal tag	200	Drain inside the below grade area near fill. Drain not shown on storm water sewer plan. Grate over this area.	Inside building –single wall.
WARING COMMONS EMG. GENERATOR	AST	200	200	South to storm drain. This drain is not shown on storm sewer drawing.	Double Walled AST
LIBRARY EMG. GENERATOR	AST	150	150	East to parking lot then northeast to pond	Double Walled AST- Daytank inside the building
RIVER CENTER GASOLINE	AST	250	250	Beach within 16 feet. Parking lot area is porous.	Double Walled AST
CAMPUS CENTER	Grease AST	300	300	Northeast to parking lot then northeast to pond	None

Truck Loading and Unloading Operations					
Truck Unloading at various ASTs and USTs	Rupture, Overfill, Piping Failure, Valve Failure	3,000	3,000	Various directions – see the flow directions above	Portable booms, mats, and sorbent materials

AST = Above ground storage tank for emergency generator

UST = Underground storage tank

\*Please note that the quantities are estimates and have not been verified by ALWE.

Sorbent materials are stored at the Maintenance building in a trailer. Granular sorbent, booms, pads, and other spill response materials are available in several buildings in the boiler rooms, for spill responses and spill containment during filling. There is also a spill kit located at the River Center, near the gasoline tank.

In addition, St. Mary's has an outside oil response contractor (Southern Maryland Oil) available to assist in the employing controls and countermeasures and spill response and cleanup. The contractor is available 24 hours a day (800) 492-3420, and will deploy a response team immediately upon authorization by St. Mary's. The recovered oil will be properly disposed of or treated by the contractor.

**10.0 Impracticability of Containment/Diversionary Structures and Equipment [40 CFR 112.7(d) and (e)]**

Due to the potential electrical hazard that may be created by the installation of containment dikes around the electrical transformers and switches, St. Mary's will maintain a thorough periodic inspection program for electrical equipment with oil storage. Each electrical transformers and switches will be checked monthly for leaks.

**11.0 Release Prevention and Containment Procedures**

**11.1 Drainage Control [40 CFR 112.7(c) and 112.8 (b)]**

Drainage control at St. Mary's is not specifically designed to contain spills. If a spill were to reach the storm drain, it would be routed a stream, pond or the river.

**11.1.1 Drainage Control In Bermed Storage Areas**

There are no bermed ASTs at St. Mary's. If St. Mary's installs bermed areas in the future, they will be equipped with a manual, open-and-closed design valve system so that the berm may be emptied, after inspection to ensure that oil-containing water is not released. When not in use, the valve will be locked in the closed position. No flapper-type drain valves will be authorized at St. Mary's.

**11.1.2 Plant Drainage Systems for Unbermed Areas**

There are no drainage structures specifically designed to control oil releases at St. Mary's. If spilled material were to reach a storm drain at St. Mary's, it would be routed to one of the streams, pond or the river. It may be possible to contain some spills by skimming the water surface of the streams, however spills occurring during storm events may limit the potential for skimming.

### **11.1.3 Final Drainage Discharge**

The stream that crosses east to west on the St. Mary's campus discharges to the Saint John's Pond, which in turn discharges to the St. Mary's River.

### **11.1.4 Drainage Systems**

St. Mary's has storm sewers installed at various locations on the campus. No oil water separators are installed. A storm water drawing dated 2000 was reviewed by ALWE. Several buildings have been added since this drawing was produced.

## **11.2 Bulk Storage Containers [40 CFR 112.8 (c)]**

### **11.2.1 Tank Compatibility**

The construction materials for the tanks at St. Mary's are compatible with their contents.

### **11.2.2 Secondary Containment**

Several of the above ground storage tanks are of double wall construction and this meets the secondary containment requirement. There are a few emergency generator belly tanks that do not currently have secondary containment, but these are located within the basements of a building without a nearby storm drain.

### **11.2.3 Rainwater Drainage**

There are no bermed ASTs at St. Mary's.

### **11.2.4 Corrosion Protection of Buried Metallic Storage Tanks**

There are several buried metallic storage tanks (the USTs) at St. Mary's. They are subjected to regular testing. Inspection records are kept by St. Mary's. The newer tanks are double walled as required by the regulations. Several of the newer tanks have leak detection systems installed.

If buried metallic storage tanks are installed at St. Mary's in the future, they will be protected from corrosion per the 1998 upgrade requirements (40 CFR 280) and subjected to regular tightness testing. Inspection records will be kept by St. Mary's.

#### **11.2.5 Corrosion Protection of Partially Buried Metallic Storage Tanks**

There are no partially buried metallic storage tanks at St. Mary's. If partially buried metallic storage tanks are installed at St. Mary's in the future, they will be protected from corrosion to the equivalent of the 1998 upgrade requirements (40 CFR 280).

#### **11.2.6 Aboveground Tank Periodic Integrity Tests**

Personnel trained to identify potential and existing releases will periodically visually inspect the ASTs, including tanks, supports, foundations, and associated piping for signs of deterioration, and leaks. Repairs to the containers and spill containment structures, along with clean up of debris and minor spills, will be performed as needed. Inspection records will be kept by Physical Plant.

The Steel Tank Institute's SP001 standard (dated July 2005) recommends that above ground shop-fabricated tanks that are in contact with the ground, and without spill containment be tested by ultrasonic methods, leak tested and have a formal external inspection at least every 10 years. This is in addition to the monthly and annual periodic inspections the owner performs. St. Mary's will perform the inspections at least this frequently. Since the ASTs are not in contact with the ground and they are double walled, no ultrasonic testing program is required.

#### **11.2.7 Control of Leakage Through Internal Heating Coils**

None of the tanks at St. Mary's have internal heating coils.

### **11.2.8 Tank Installation Fail-safe Engineering**

The ASTs at St. Mary's are equipped with visual level indicators that operate on a float system. Loading/filling procedures call for tanks to be filled to a safe height, which has been determined to be 90 percent of capacity.

The fill port and vent pipe for each tank will be clearly identified with its own sign and markings. The sign will show the volume of the tank as required.

The newer USTs are equipped with leak detection monitoring systems. The St. Mary's personnel responsible for the UST filling operations have been trained on the proper use and maintenance of the monitoring systems. The alarms and other alerts will be tested regularly and repaired when proper operation is hindered. It is not expected that USTs have a reasonable potential to immediately discharge to a waterway, as the release would likely be contained, at least initially, in the surrounding soils.

The loading/unloading operations at the storage tanks present the potential for spill resultant of overfilling. The newer USTs are equipped with catch basins to contain minor spills from overfills.

For future tank installations, high level sensors with audible and visible alarms, whistler vents, high-level automatic flow cutoff devices, and other communication devices will be installed as required.

### **11.2.9 Plant Effluent Discharges**

St. Mary's does not have process effluent discharges or disposal facilities.

### **11.2.10 Visible Oil Leaks**

Facility personnel are trained to visually inspect tank seams, gaskets, rivets, bolts, flanges, and joints for visible oil leaks. Oil leaks and/or spills are to be reported immediately to EHS and

corrected as soon as possible. EHS personnel will evaluate the situation to determine what response and reporting is required (see Appendix D for Oil Spill Emergency Response Plan).

#### **11.2.11 Mobile or Portable Oil Storage Containers [40 CFR 112.8(c)(11)]**

St. Mary's does not currently have any mobile or portable oil storage tanks. If such tanks are employed at St. Mary's in the future, secondary containment will be provided. They will not be located in areas of periodic flooding or washout.

### **11.3 Facility Transfer Operations [40 CFR 112.8(d)]**

#### **11.3.1 Buried Piping Installation Protection and Examination**

The older steel heating oil USTs at St. Mary's have buried piping. These USTs and their piping systems are periodically tested using an outside vendor.

If buried piping is exposed in the future, it will be carefully examined by an inspector for deterioration, corrosion, and other damage. The use of buried piping will be kept to a minimum in the future.

#### **11.3.2 Out-of-Service and Standby Service Pipes**

There are no known out-of-service or standby terminal connections at St. Mary's. When pipes are taken out of service or into standby service for an extended period, the pipes will be clearly marked and capped or blank-flanged to prevent inadvertent use. Tank contents will be emptied or periodically monitored. In the event of an unexpected loss of material, St. Mary's will undertake any necessary remedial action.

#### **11.3.3 Piping Support Design**

The piping at St. Mary's appears to be properly supported and constructed, decreasing the possibility of abrasion or corrosion and allowing for expansion and contraction.

Pipe supports employed in the future will be designed to minimize abrasion and corrosion and allow for expansion and contraction.

#### **11.3.4 Aboveground Valve and Pipeline Examination**

Above ground piping is used on some of the emergency generator ASTs. Aboveground piping systems are inspected monthly. Monthly inspections include assessing the general condition of the flanges, joints, valves, piping supports, and metal surfaces.

#### **11.3.5 Aboveground Piping Protection from Vehicle Traffic**

The aboveground piping systems at St. Mary's are not subject to vehicular traffic.

If additional aboveground piping is installed at St. Mary's in the future, signs will be posted warning vehicles of endangered piping and applicable height restrictions. Physical barriers will be considered.

### **11.4 Facility Tank Car and Truck Loading and Unloading Operations [40 CFR 112.7(h)]**

St. Mary's receives oil in trucks supplied by others. The vehicles load oil and gasoline into the various tanks at St. Mary's. The only regular authorized unloading operations are into vehicles owned or operated by St. Mary's. The tanks on those vehicles are designed to carry fuel for consumption by only that vehicle.

A trained representative from St. Mary's Physical Plant will be present to observe all loading and unloading operations. Facility standard operating procedures for loading and unloading operations will be developed and circulated. A copy is included in Appendix C.

#### **11.4.1 Department of Transportation Regulations**

St. Mary's will require that the oil delivery companies drivers sent to St. Mary's are trained and will comply with Department of Transportation (DOT) regulations (49 CFR 177) and facility standard operating procedures for loading and unloading operations. The truck drivers will be

instructed by their own dispatchers to make no deliveries or pick-ups unless a St. Mary's representative is present to authorize, direct, and oversee loading and unloading operations.

#### **11.4.2 Secondary Containment for Vehicles**

There are currently no catch basins, treatment systems, or secondary containment systems for loading/unloading operations at St. Mary's.

St. Mary's will install curbing systems and/or seal down gradient storm-water drains and use absorbent booms while trucks load oil into tanks. Granular sorbent material will be available to the fueling operators to contain spills.

#### **11.4.3 Warning or Barrier System for Vehicles**

Warning signs will be posted at loading and unloading areas informing personnel that they must examine transfer lines to ensure that they are completely disconnected before departing. In addition, wheel chocks will be employed.

#### **11.4.4 Lowermost Drainage Outlet Examination**

Warning signs will be posted at loading and unloading areas informing personnel that they must examine all drains and other outlets for leakage before and after oil loading operations. In addition, the area in which the loading occurred will be examined for evidence of leaks, spills, or other releases.

### **11.5 Oil Production Facilities (Onshore) [40 CFR 112.9]**

St. Mary's is not an oil production facility and therefore this section of the SPCC regulations is not applicable to St. Mary's.



**11.6 Oil Drilling and Work Over Facilities (Onshore) [40 CFR 112.10]**

St. Mary's is not an oil drilling and work over facility and therefore this section of the SPCC regulations is not applicable to St. Mary's.

**11.7 Oil Drilling, Production, or Work Over Facilities (Offshore) [40 CFR 112.11]**

St. Mary's is not an oil drilling and work over facility and therefore this section of the SPCC regulations is not applicable to St. Mary's.

**11.8 Inspections, Tests, and Records [40 CFR 112.7(c) and 112.8 (c)]**

Facility personnel will be trained to be observant during normal operations for signs of malfunctions or problems that might lead to leaks, spills, or other releases.

Monthly visual inspections will be conducted for oil storage tanks, piping, pumps, and drum storage areas to identify leaks, seepage, stained soils, or signs of significant deterioration. Identifiable accumulations of oil will be cleaned-up promptly and the cause of the accumulation will be determined and repaired. Abnormal tank conditions and repairs made will be reported to Mr. Thorton. Any leaks, spill response or breach in tank integrity will be recorded in the tank inspection checklist located in Appendix A.

St. Mary's will be responsible for ensuring that the required inspections, training, and tests are conducted; signing the reports of those activities; and keeping the reports and associated records for at least three years.

**11.9 Security [112.7(g)]**

St. Mary's is an unsecured facility with minimal fencing or other barriers to public access. St. Mary's will ensure that pipeline connections are securely capped and locked when not in use. Drains and valves will be locked in the closed position. The gasoline and diesel pumps located inside the fenced in portion near the facilities building will be locked, so the pump can not be used

and no UST loading/filling and unloading/fueling operations can occur except during hours when there is adequate lighting available to visually identify spills and deter vandalism.

#### **11.10 Personnel Training [112.7(f)]**

St. Mary's will conduct annual training sessions to instruct staff in proper housekeeping; operation and maintenance of equipment; laws and regulations; spill prevention, detection, and response activities; and notification requirements. A more detailed outline of the training program is provided below.

- a. Personnel responsible for duties set forth under the SPCC plan are thoroughly familiar with the plan and its requirements.
- b. Personnel who may become directly involved with a release will be trained, including oil-handling personnel. The training will address regulations, known spill events and failures, loading/unloading operations, malfunctioning components, and precautionary measures. Training sessions may include timed practice placement of control and countermeasure devices and materials and other simulations of spills.
- c. Training sessions will be conducted at intervals frequent enough so that an adequate understanding of the SPCC plan is achieved. A record of attendance will be kept. At a minimum, training sessions will be held annually.
- d. Employees who may become directly involved in a spill will be trained on how to prevent spills according to this SPCC plan and good management practices.
- e. None of the employees are to be designated "first responders" for incidents involving hazardous materials, including petroleum products. As such, the responsibility for response will be delegated to the appropriate personnel of the hazardous materials unit of the local fire department for stabilization of the situation and then to the spill response contractor for cleanup.

**12.0 Facility Response Plans [40 CFR 112.20]**

ALWE concluded that St. Mary's is not a substantial harm facility as defined in 40 CFR 112.20(f) and therefore not required to prepare and submit a Facility Response Plan (FRP). Appendix E contains the *Certification That This Facility Does Not Pose Substantial Harm*, as required by Section 3 of Appendix C to 40 CFR 112. This has been signed and certified by a representative of St. Mary's.

**13.0 Facility Response Training and Drills/Exercises [40 CFR 112.20]**

Since the facility is not a substantial harm facility (Section 12), this section is not applicable to St. Mary's.

**APPENDIX A**

**INSPECTION GUIDELINES AND CHECKLIST**

## **Inspection Guidelines**

The following inspection guidelines are to be used by employees during routine inspections.

1. Aboveground tanks: Conduct visual inspection monthly, report all leaks promptly; inventory tanks weekly using level indicators and conversion tables (inches of product to gallons).
2. Aboveground piping: Conduct visual inspection of pipes and supports monthly, report all leaks promptly.
3. Underground tanks: Conduct visual inspection of grounds around tank and inspect inventory/leak monitor records monthly, report unusual odors and stains and discrepancies, immediately. Test the tanks monthly with the leak detection system in accordance with manufacturer's recommendations.
4. Valves, gaskets, and flanges: Conduct visual inspection monthly; report all leaks immediately.
5. Drum Storage Areas: Conduct visual inspection monthly, report all leaks immediately.
4. Diked areas: Conduct visual inspection monthly, report all leaks immediately.
5. Security: Perform visual inspection of fence and lighting monthly, inspect for vandalism monthly, report break-ins, vandalism, fence deterioration, and lighting outages immediately.
6. Spill prevention equipment: Inventory supplies monthly and after use, submit list of needed supplies immediately.
7. Perform preventative maintenance per the equipment-specific schedule.

**APPENDIX B**

**TRAINING RECORDS**



**APPENDIX C**

**LOADING/UNLOADING PROCEDURES**



## **Loading and Unloading Procedures**

Purpose: to provide for oil transfers from tank trucks to the on-site tanks and from the on-site tanks to vehicles, drums, and other containers minimizing the potential for leaks, spills, and other releases. The oil loading/filling process is controlled by the tank truck operator and is assisted by St. Mary's personnel. Sorbent blocking materials will be placed around storm-water drains and drop-inlets during loading/filling operations.

### **General Procedures for Fuel Oil Loading/Unloading**

- A. Check tanker manifest for proper oil type and quantity. Verify quantity in and capacity of tanker.
- B. Gauge the tank and use the dipstick readings to calculate the amount of product currently in tank. Determine if the amount of oil being delivered can be accepted in the tank, thereby preventing overfills.
- C. Ensure that the tanker engine has been turned off and there are no other sources of ignition.
- D. Verify that the handbrake has been set on the tanker and have the driver place wheel chocks at the front and rear tires to prevent movement of the tanker during fueling operations.
- E. Block down gradient storm drain inlets and place portable sorbent booms in position to catch possible spills.
- F. Ensure that hoses have been properly connected prior to commencing loading/unloading operations and that the tanker is vented. Operations shall not commence if leaks at the connection points or in the hose are observed.
- G. Observe the loading operations.
- H. Immediately report any spill and take appropriate measures.
- I. Ensure that valves have been closed and hoses have been emptied and disconnected, prior to authorizing the driver to disengage.
- J. Verify the quantity of oil delivered using dipstick readings and reconcile with the delivery ticket.
- K. Remove the wheel chocks, drain blocks, and booms and return them to their storage area.
- L. Immediately report any spill and take appropriate measures.

**APPENDIX D**

**OIL SPILL EMERGENCY RESPONSE PLAN**

## EMERGENCY RESPONSE PLAN FOR OIL SPILLS

In the event of an oil spill, the following action will be taken:

1. (a) Notify all persons listed below:

Ms. Polly Miller, Environmental Health & Safety Coordinator

(240) 895-3059 (Office)

240-256-0291 (cell)

Derek K. Thorton, Assistant Vice President for Campus Operations

(240) 895-4287 (Office)

- (b) Notify one of the following:
- 

2. The following agencies will be notified by Physical Plant. Notification must be made no later than two (2) hours after detection of the spill.

**Maryland Department of Environment**

410-631-3386 (during normal office hours)

410-974-3551 (after normal office hours)

**U.S. Coast Guard**

410-962-5105 (Baltimore Marine Safety Office) or

1-800-424-8802 (National Response Center)

3. Containment and clean-up procedure:

- (a) 1. Place containment booms at the intersection of storm drain with the pond or stream the drain empties into.
2. Place Absorbent "C" behind boom.
- (b) Survey stream to ascertain extent of travel of oil spill. Place booms and absorbent as in (a) 1 and (a) 2 above at furthest point downstream beyond area where oil is detected.
- (c) Remove oil saturated absorbent material and place in leak proof 55-gallon drums.
- (d) Proceed to source of spill, spread absorbent material, and collect oil saturated absorbent in 55-gallon leak proof 55 drums.

- (e) Flush storm drain with water and repeat steps (a) 2 and (c) above. Continue this process until all oil has been retrieved.
- (f) The ranking Physical Plant Representative at the scene will make a visual inspection of the spill area and areas affected by oil spill to ascertain that in fact all oil has been recovered.
- (g) If the size of the oil spill exceeds the capability of St. Mary's personnel to handle, the following outside contractor should be contacted by the ranking Physical Plant Representative present:

Southern Maryland Oil

Telephone – 800-492-3420

- (h) Contact authorized waste oil disposal company to dispose of 55-gallon drums containing oil saturated absorbent material.

4. The following is available for spill control at the Maintenance Building:

- (a) Shovels, rakes, etc., from Grounds and Transportation Departments.
- (b) Back hoe and pay loader from Grounds and Transportation Departments.
- (c) 40 - 8-inch x 18-inch absorbent pillows
- (d) 22 - 8-inch x 18-foot absorbent booms
- (e) 10 - fabric socks
- (f) 4 - 4-foot x 200-foot absorbent rolls (1 medium and 3 heavy duty)
- (g) 2 - 20-gallon lockable spill waste containers
- (h) 1- Spill Blocker (rough surface)
- (i) 1- PIG Conical Drain Plug Kit
- (j) 2 - Round Drain Blockers
- (k) 1 - PIG Drain Blocker Plug (48 in.)
- (l) 2 - PIG Oil Only Spill Pads (16 ½ in. x 20 in.) 200/bag
- (m) 4 – PIG Spill Kits (1 each in Assoc. Director/Trades Mgr. Vehicles). Each kit contains 3-3 in. x 48 in. PIG socks, 12-16 ½ in. x 20 in. PIG mats-double pads and disposal bags.

**APPENDIX E**

**CERTIFICATION OF APPLICABILITY OF THE  
SUBSTANTIAL HARM CRITERIA**

**CERTIFICATION OF APPLICABILITY OF THE  
SUBSTANTIAL HARM CRITERIA**

Facility Name: St. Mary's College of Maryland

Facility Address: 18952 East Fisher Road, St. Mary's City, MD 20686

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

\_\_\_X\_\_\_ no

2. Does the facility have a total oil storage capacity greater than 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

\_\_\_X\_\_\_ no

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<sup>1</sup>) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (See Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

\_\_\_\_\_ yes

\_\_\_X\_\_\_ no

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<sup>1</sup>) such that a discharge from the facility would shut down a public drinking water intake<sup>2</sup>?

\_\_\_\_\_ yes

\_\_\_X\_\_\_ no

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<sup>1</sup> If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR 112, public drinking water intakes are defined to be public water systems as defined in 40 CFR 143.2(c).

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 with the last 5 years?

\_\_\_\_\_ yes

\_\_\_\_\_ X \_\_\_\_\_ no

CERTIFICATION:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, 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.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Name: Derek K. Thorton

Title Assistant Vice President for Campus Operations

**APPENDIX F**

**TANK TESTING SCHEDULE**



**APPENDIX G**

**CROSS REFERENCE TO REGULATIONS**

**SPCC Cross-Reference**

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\* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

**APPENDIX I**

**LIST OF TRANSFORMERS AND SWITCHES**

**FIGURES**