



Spill Prevention, Control, & Countermeasure Plan

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This document has been prepared per the requirements of 40 CFR 112 – Oil Pollution Prevention, with observance to all subsequent, applicable amendments.

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1 Introduction

1.1 Purpose

This Spill Prevention, Control, and Countermeasure (SPCC) plan was prepared by the University of Arkansas at Little Rock, located at 2801 S. University Ave, Little Rock, AR 72204. The primary purpose of this SPCC is to establish the University's procedures, methods, equipment, and other requirements to prevent the discharge of oil into or upon the navigable waters of the United States. Should a spill or release of oil occur, this SPCC also provides guidance to help minimize negative impacts to human health and the environment and streamline response and recovery efforts.

This Plan has been prepared to satisfy the requirements of Title 40, Code of Federal Regulations, Part 112 – Oil Pollution Prevention ([40 CFR Part 112](#)) as well as all applicable requirements specified in subsequent amendments to this regulation, issued through November 2009.

The term “oil”, as used throughout this SPCC, is broadly defined as oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Note: Since the requirements of §112.8 and §112.12 are comparable, UALR will apply the same standards, protective measures, and release response methodology observed for petroleum-based oil to bulk containers of plant and animal oils (i.e. used cooking oils) as well.

1.2 Applicability

The regulations apply to facilities engaged in the production, storage and/or use of oil, if those facilities could reasonably be expected to discharge oil into or upon the navigable waters of the United States in quantities that may be harmful. Such a discharge would violate applicable water quality standards, cause a surface sheen on or discoloration of navigable waters or adjoining shorelines, or cause sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

The regulations provide an exemption for facilities whose underground oil storage capacity is 42,000 gallons or less and whose aboveground oil storage capacity does not exceed 1,320 gallons. However, UALR's aboveground storage capacity exceeds 1,320 gallons, thus the University is required to comply with applicable portions of the regulations. Diesel fuel and gasoline account for the largest portion of the oil stored on campus. Oil is also stored in transformers, switches, pumps, compressors and other mechanical or electrical equipment. Additionally, used cooking oil and used motor oil are collected for recycling.

This SPCC plan is applicable for all university operations that involve the storage, transfer, or use of oil that may potentially result in discharge under both normal working conditions or during an emergency situation. Note: The term “facility” is used generically throughout this SPCC and refers to UALR's main campus, Law School, And Benton Center campuses in its entirety, unless otherwise noted.

1.3 Standards of Preparation & P.E. Certification

This written SPCC Plan has been prepared in accordance with good engineering practices and in the sequence required by the regulations. Required procedures or information have been placed, as needed, in appendices to this plan.

This plan has been reviewed and certified by a licensed Professional Engineer (P.E.). A copy of the P.E. certification is included in [Appendix A](#).

1.4 Plan Administration

1.4.1 Availability & Location

The UALR SPCC Plan and all supporting documents are maintained by Environmental Health and Safety in cooperation with Facilities Management. The SPCC Plan is available to University departments and employees as well as the general public via the Environmental Health and Safety web site at <http://ualr.edu/facilities/index.php/home/environmental-health-safety/>, though, in the interest of University security, some sensitive information is not presented on the web site. The plan, in its entirety, is available for on-site review at the offices of Environmental Health and Safety and/or Facilities Management.

1.4.2 Amendment & Review

1.4.2.1 Amendment of SPCC Plan by Regional Administrator

If UALR discharges more than 1,000 gallons of oil in a single discharge, or discharges more than 42 gallons of oil in each of two discharges occurring within any twelve month period, UALR will submit the information required by §112.4(a) of the regulations to the EPA Regional Administrator.

If after review of the information submitted by UALR, the Regional Administrator finds that the Plan does not meet the requirements of the regulations or that amendment is necessary to prevent and contain discharges from UALR, the Regional Administrator may require UALR to amend this Plan. If the Regional Administrator proposes that the Plan be amended, UALR will, within 30 days, either amend the Plan and implement the amended Plan or appeal the decision. If UALR chooses to amend the Plan, the Plan will be amended within 30 days and implemented as soon as possible but no later than six months after the amendment. If UALR appeals the decision, the Regional Administrator must notify UALR of his/her decision within 60 days of receiving the appeal.

1.4.2.2 Amendment of SPCC Plan by Owners or Operators

UALR will amend this Plan when there is a change in facility design, construction, operation, or maintenance that materially affects its potential for a discharge. Examples of 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 at a facility.

An amendment made under this section will be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.

1.4.2.3 Five-Year Review and Evaluation

UALR will review and evaluate its SPCC Plan at least once every five years. As a result of this review and evaluation, UALR will amend its SPCC Plan within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge.

1.4.2.4 Amendment Implementation and Documentation

UALR will implement any amendment as soon as possible, but not later than six months following preparation of any amendment. UALR will document completion of the review and evaluation, and sign a statement as to whether the Plan will be amended. UALR will have a Professional Engineer certify any technical amendments to this Plan. The form used to document that review and evaluation for amendment has been completed is provided in [Appendix B](#) along with an amendment log sheet.

1.5 Responsibility

The Director of Environmental Health and Safety is responsible for developing and maintaining this SPCC, and for making sure that the plan is available to the EPA Regional Administrator for on-site review.

1.6 Management Approval

This SPCC has the full approval of management at a level of authority needed to commit the necessary resources required to fully implement the plan in the unlikely event of a discharge of oil into or upon the navigable waters of the United States.

This SPCC has been approved by the University’s Director of Environmental Health and Safety. A signed confirmation of management approval is included in [Appendix C](#).

1.7 Conformance with Requirements

1.7.1 Cross Reference with SPCC Provisions

Table 1.7.1-A cross references the sections of the UALR SPCC to applicable parts of [40 CFR Part 112](#).

Table 1-1 Cross Reference with SPCC Provisions

| Applicable Section of 40 CFR 112 | Description | Location in SPCC |
|----------------------------------|--|------------------|
| 112.1 | Applicability | Section 1.2 |
| 112.3(d) Appendix A | Professional Engineer | Section 1.3 & |
| 112.3(e) | Availability and Location | Section 1.4.1 |
| 112.4 | Amendment of SPCC Plan by Regional | Section 1.4.2.1 |
| 112.5 | Amendment of SPCC Plan by Owners or Operators | Section 1.4.2.2 |

| | | |
|----------------------|--|--|
| 112.5(b) | Five-Year Review & Evaluation | Section 1.4.2.3 & Appendix B |
| 112.7 | Management Approval | Section 1.6 & Appendix C |
| 112.7 | Cross Reference with SPCC Provisions | Section 1.7.1 |
| 112.7 | Facilities, Procedures, Methods or Equipment Not Yet Operational | Section 1.7.2 & Appendix D |
| 112.7 (a)(1) | Conformance with Requirements | Section 1.7.3, 1.8 & Appendix E |
| 112.7(a)(3) | General facility information | Section 2.1 - 2.4 & Appendix F |
| 112.7(a)(3) | Facility site plan | Section 2.5 & Appendix G |
| 112.7(a)(3) | Facility diagram | Section 2.6 & Appendix H |
| 112.7(a)(4) | Discharge notification | Section 3 & Appendix I |
| 112.7(a)(5) | Discharge response | Section 4 |
| 112.7(a)(6) | Contact Lists | Section 2 & 3 |
| 112.7(b) | Potential discharge volumes and direction of flow | Section 5 |
| 112.7(c) | Containment and diversionary structures | Section 6 |
| 112.7(d) | Practicability of secondary containment | Section 7 |
| 112.7(e) | Inspections, tests and records | Section 8 |
| 112.7(f) | Personnel training, and discharge prevention procedures | Section 9 |
| 112.7(g) | Security | Section 10 |
| 112.7(h) | Loading Racks | Section 10 |
| 112.7(i) | Tank Repair and Evaluation | Section 10 |
| 112.8.b | Facility drainage | Section 11 |
| 112.8(c)(1-5) | Bulk Storage Containers / Secondary Containment | Section 12 |
| 112.8(c)(6) | Inspections | Section 13 & Appendix J |
| 112.8(c)(7) | Leakage control | Section 14 |
| 112.8(c)(8) | Overflow prevention system | Section 15 |
| 112.8(c)(9) | Effluent treatment facilities | Section 16 |
| 112.8(c)(10) | Visible discharges | Section 17 |
| 112.8(c)(11) | Mobile and portable containers | Section 18 |
| 112.8(d) | Transfer operations, pumping, and in-plant processes | Section 19 |
| 112.12 | Requirements for Animal Fats and Oils and Greases for Onshore Facilities | Same as SPCC procedures for petroleum oil. |

1.7.2 Facilities, Procedures, Methods or Equipment Not Yet Operational

Additional facilities or procedures, methods, or equipment not yet fully operational at the time of execution of this SPCC, are discussed in [Appendix D](#). The details of installation and operational start-up are discussed, as are conformance with the requirements listed Part 112.7.

1.7.3 Overview of Applicable Sections of the Rule & Amendments

The preparation of this SPCC Plan included a comprehensive review of the regulations ([40 CFR Part 112](#)) and Amendments from December 2006, December 2008, and November 2009 to determine which subparts and sections apply to UALR operations.

The review indicated that UALR must comply with applicable requirements in Subpart A, §112.1 through §112.7. Additionally, UALR must comply with applicable requirements in Subpart B, §112.8, and Subpart C, §112.12.

Taken in its entirety, this Plan and its supporting documents address all applicable requirements. If UALR operations change to the extent that additional sections become applicable, UALR will amend this plan and implement the amended plan as required.

1.8 Certification of Applicability of the Substantial Harm Criteria Checklist

Per the requirements of Section 112.20(e) of the facility response plan regulations, as a facility regulated by 40 CFR Part 112, UALR must complete [Appendix C to Part 112](#) – Substantial Harm Criteria. This initial screening is used to determine whether the University is required to develop a facility response plan.

Based on the results of the initial screening, at the time of execution of this SPCC, UALR was not required to submit a facility response plan. Results of the screening are included in [Appendix E](#) of this SPCC.

2 General Facility Information, Site Plan, and Facility Diagram

2.1 Facility Owner and Operator Information

The facility owner name, address, and telephone number is as follows:

University of Arkansas at Little Rock
2801 S University, Little Rock AR
72204 (501) 569-3390

2.2 Facility Contacts

Facility contacts for this SPCC are presented in Table 2.2.1 below. These contacts shall be notified immediately in the event of an oil spill or discharge.

Table 2-1 Facility Contact Information

| Name | Title | Mobile Phone | Office Phone |
|----------------------|-----------------------------|--------------|--------------|
| Vince Rodgers | Director, EHS | 501-529-2841 | 501-371-7602 |
| Mike Seamon | Asst. Director Building Ops | 501-837-8440 | 501-569-3574 |
| Todd Willey | Occupational Safety Officer | 501-479-6069 | 501-683-0553 |

2.3 Facility Description

UALR's Campus is located at 2801 S University, Little Rock, AR in central Arkansas. The approximate coordinates are: Lat 34.722648 Long -92.340074. A broad range of academic programs, activities, and services are offered.

The University of Arkansas at Little Rock is a metropolitan research university that provides accessibility to a quality education through flexible learning and unparalleled internship opportunities. At UALR, we prepare our more than 12,000 students to be innovators and responsible leaders in their fields. Committed to its metropolitan research university mission, UALR is a driving force in Little Rock's thriving cultural community and a major component of the city and state's growing profile as a regional leader in research, technology transfer, economic development, and job creation.

2.4 Facility Oil Storage

UALR stores oil for use in emergency generators and in support of a variety of facility operations. The campus also has oil-containing equipment located throughout the facility. The locations where oil is either stored or contained in equipment in quantities of 55 gallons or greater are summarized in [Appendix F](#).

The majority of the facility's oil storage falls into one of the following categories:

- Diesel storage for emergency generators
- Unleaded gasoline and ultra-low sulfur diesel storage for vehicle use
- Small quantities of used oil collected from maintenance activities
- Hydraulic oil contained in elevators
- Mineral spirits contained in transformers
- Food oil used stored for use in food preparation
- Waste food oil and grease collected from food preparation

2.5 Site Plan

The site plan for the UALR Campus is provided in [Appendix G](#).

2.6 Facility Diagram

A facility diagram that indicates the location and contents of each fixed oil storage container is provided in [Appendix H](#).

2.7 Drainage Pathway and Proximity to Navigable Waters

Stormwater from UALR flows to drainage ditches and stormwater drains. The topography of the campus is generally flat, with slight-to-moderate, localized, surface elevation variations in proximity to buildings, landscaping, and paved areas. Coleman Creek runs through the center of the university and most runoff is deposited there.

The university's storage tanks, bulk containers, machinery, hydraulic elevators, and other oil-containing equipment are not typically located near floor drains that empty into the storm sewer. In some cases, storage tanks, transformers and grease traps are located in areas that have pathways that may

eventually reach storm sewers in the event of a slow, prolonged or sudden, catastrophic release; however, historically, these have proven to be unlikely failure scenarios.

2.8 Facility Spill History

UALR's campus has not had any spill events in the past five years in excess of 25 gallons of oil. Vehicle accidents on campus have resulted in several small spills, generally a few quarts in magnitude, to impermeable road surfaces. In all of these cases, the spills were cleaned up immediately and there were no discharges to the environment. Waste from cleanup activities was properly disposed by a hazardous waste disposal vendor.

3 Discharge Notification

3.1 Notification Responsibility

The person discovering a release of oil from a container, tank or operating equipment must initiate certain actions immediately, which include reporting the release. Notification requirements vary depending on the nature of the spill and whether the spill has resulted in fire or injury.

3.2 Spills That Do Not Require Notification

Incidental spills of oil may be immediately cleaned up by UALR personnel if the following conditions are met:

1. The spill has not resulted in a release to the environment, which includes but is not limited to permeable ground, drainage areas, surface water, drains, and sewers;
2. The spill poses no threat to human health, and is not a fire or explosion hazard;
3. Appropriate spill response materials are readily available (spill kits or other absorbent materials);
4. Those involved with the cleanup have, and understand how to use, appropriate personal protective equipment (PPE);
5. Those involved with the cleanup are familiar with the hazards posed by the spilled material;
6. The spill is limited in size (no more than a few gallons), readily stoppable, and easily contained.

Spills that meet the criteria described above do not require notification to EHS or any additional external notifications.

Waste from an incidental spill, including any contaminated debris, from cleanup should be containerized, labeled and staged in secondary containment. EHS may be contacted if assistance is required during small spill cleanup or afterward for assistance in preventing recurrence of the incident.

Contact Facilities at 569-3390 or place a hazardous waste pickup request through the EHS website at <http://www.UALR.edu/facilities/ehs/new-waste-form.php> to have waste from spill cleanup collected for proper disposal.

3.3 Spills That Require Initial Notification

For spills that do not meet the conditions of the previous section, initial notification requirements depend on whether or not the spill has resulted in fire or injury:

Call 911 For spills or exposures, which result in *fires and/or injuries that require urgent medical attention*, i.e. a rescue squad needs to be dispatched to the scene.

Call 569-3390 For spills or exposures *without fires or injuries or with injuries that do not require urgent medical attention*. **Note:** After hours and on weekends/holidays, call University Police at (501) 569-3400, who will then contact EHS.

Contact Facilities at 569-3390, immediately after 911 has been called, so that EHS can be apprised of the situation and can provide assistance with response efforts.

When contacting Facilities, the following information must be provided:

Your name and the incident location

Details of the incident including:

- Type of incident, liquid spill, gas leak, etc.;
- Type and quantity of hazardous material involved, if known;
- Type of exposure to personnel, skin or eye contact, inhalation, etc.;
- Extent of injuries or damage, if any.

In all cases, take the following actions:

- Evacuate the immediate area, or the entire building, if necessary by pulling the fire alarm;
- Keep others out of the area;
- If safe to do so, assist others to safety.

3.4 External Agency Notification

EHS shall determine if a reportable spill has occurred and shall make required notifications and reports by telephone, and in writing, to the appropriate agencies as soon as practicable, and within any deadlines for such notifications and reports.

Table 3.4-1 provides useful contact numbers for agency notification.

Table 3-1 Federal, State & Local Emergency Contact Numbers

| Agency | Phone Number |
|---|----------------------------------|
| Danger to Life or Health: | |
| University Police (24 hr) | 911 or (501) 569-3400 |
| Fire Department | 911 |
| Immediate Notification Required: | |
| National Response Center (24 hr) | (800) 424-8802 or (202) 267-2675 |
| Alternate Immediate Contacts: | |
| U.S. EPA Region VI | (800) 887-6063 |
| Subsequent Communications: | |
| Little Rock Emergency Management | (501) 569-4130 |

3.4.1 Notification Criteria

The need to make external notification is triggered by a discharge that results in any of the following:

1. A violation of state water quality standards
2. Visible film or sheen on the water's surface (known as the "sheen rule")
3. Sludge or emulsion deposited below the water's surface
4. Release of greater than 25 gallons (or potential > 25 gallons) to any surface
5. Response efforts that require additional state or federal assistance.

3.4.2 Whom to Notify

For spills that meet the notification criteria described in the previous section, a notification hierarchy is generally observed. At the federal level, the National Response Center (NRC) serves as a clearinghouse for all of the states. Ideally, one call to the NRC should set the chain of proper notifications in motion. Practically, it is up to the EHS to make certain the NRC and other state agencies are all properly notified.

3.4.2.1 The National Response Center

Oil discharges that meet any of the notification criteria shall be immediately reported by EHS to the National Response Center (NRC). The NRC is the federal government's centralized reporting center, which is staffed 24 hours a day. If, for any reason, reporting directly to the NRC is not possible, initial notification can be made to the EPA in Region VI or to the Arkansas Department of Environmental Quality (ADEQ).

3.4.2.3 Arkansas Department of Environmental Quality

EHS must notify the DEP in writing within 24 hours of the discovery of a discharge, or before the close of the next business day of any release that meets the notification criteria. An initial phone call is not immediately required.

3.4.3 What Information to Include

When initially reporting a release to the NRC or ADEQ, EHS will provide all available, pertinent details about the release, including but not limited to the following:

1. The exact address or location and phone number of the facility;
2. The date and time of the discharge;
3. The type of material discharged;
4. Estimates of the total quantity discharged;
5. The source of the discharge;
6. A description of all affected media;
7. The cause of the discharge;
8. Any damages or injuries caused by the discharge;
9. Actions being used to stop, remove, and mitigate the effects of the discharge;
10. Whether an evacuation may be needed;
11. The names of individuals and/or organizations who have also been contacted;
12. Number and types of injuries (if any);
13. Weather conditions at the incident location;

14. Other information of use to emergency responders; such as, names of responsible parties, vehicle/tanker information (if applicable), and property damage estimates.

3.4.4 *Where to Find Additional Assistance*

If the spill cleanup is beyond the capabilities of UALR personnel, EHS will request the assistance of qualified spill response, clean-up, and remediation contractors. Contact information for oil spill response coordinators is provided in Table 3.4-2.

Table 3.4.2 Oil Spill Response Contractors

| Contractor | Phone Number |
|----------------|----------------|
| Waste Services | (501) 888-4323 |
| Southern Tank | (501) 376-6333 |
| CTEH | (501) 801-8500 |

4 Discharge Response

4.1 Discovery of a Release

The person discovering a release of oil or a hazardous substance from a container, tank or operating equipment should initiate certain actions immediately.

4.1.1 *Initial Response Actions*

The following initial response actions should be taken by the discoverer of an oil release, as long as there is no immediate danger to the life and health of the responder posed by the release:

- Extinguish any sources of ignition. Until the material is determined to be non-flammable and non-combustible, all potential sources of ignition in the area should be turned off. Avoid creating sparks or static electricity – do not unplug or turn off electrical equipment or lights. Report the release (See [Section 3](#) of this SPCC).
- Evacuate the immediate area, or the entire building, if necessary by pulling the fire alarm. Keep others out of the area.
- If safe to do so, assist others to safety.
- Identify the material released.
 - Consult the Safety Data Sheet (SDS) for the product, which provides information on physical, and health hazards, first aid measures, and what to do in the event of a spill or release. SDSs are available through UALR EHS or may be acquired online by search.
- Attempt to stop the release at its source. If it is safe to do so, simple measures such as closing a valve, pushing an emergency stop button, or up righting/rotating a container to prevent further release of the material can be attempted. Assure that no danger to human health exists first.

4.1.2 *Containment of a Release*

If oil or a hazardous substance is released to the environment, it is crucial that the material be contained as quickly as possible. The following actions may be taken by appropriately trained and equipped

personnel at the University or from outside organizations:

1. **Stop the release at the source.** If the source of the release has not been previously found and stopped, EHS and/or the Little Rock Fire Department Hazardous Materials response unit will determine if special protective equipment is necessary to approach the release area, or if assistance is required to stop the release.
2. **Contain the material released into the environment.** Following proper safety procedures, the spill should be contained using appropriate spill materials such as absorbent pads & socks, non-sparking tools, storm drain covers, plastic sheeting, etc.

See Table 4-1 below for a list of the spill response equipment that is available at UALR in the EHS office in Facilities Management. If a release occurs from a tank that is located in close proximity to a storm drain, the drain must be bermed or blocked off as part of initial containment efforts. This can be done by completely surrounding the drain with impermeable material, or by covering the drain with a liquid tight cover.

Note: Additional supplies might also be available for any given response; the items in the tables should be considered the minimum amount on hand at any time. Additional supplies such as oil dry, sand bags, and absorbent booms or pads are also frequently kept at Facilities.

3. **Recover or clean up the material spilled.** As much material as possible should be recovered and reused when possible. Material which cannot be reused must be properly containerized, labeled, and disposed of properly. Every effort should be made to prevent the mixing of hazardous and non-hazardous materials in order to reduce disposal costs.
4. **Decontaminate tools and equipment used in cleanup.** Even if tools and equipment are dedicated only to cleanup efforts, they must be decontaminated before replacing them in the spill control kit. Wastes generated from decontamination efforts must be disposed of properly along with the wastes generated from the spill cleanup.
5. **Arrange for proper disposal of any waste material.** The waste material from the cleanup and decontamination of tools and equipment must be subjected to a hazardous waste determination by UALR EHS. Representative sampling and analysis may be necessary to make this determination. The waste must be transported and disposed of in compliance with all applicable laws and regulations.

Table 4-1 lists the spill response materials that are kept at Facilities. Monitoring equipment, which may also be necessary during a response, is kept in the EHS Office in Facilities.

These materials are available for immediate mobilization to anywhere on campus and can be transported via golf cart, van, or pickup truck, depending on the size and characteristics of the release.

Table 4-1 Spill Response Equipment and Supplies

| Location | Description | Capabilities |
|----------|---|---|
| FM | Tyvek chemical resistance coveralls | Protect body from minor chemical hazards |
| FM | Safety Goggles | Protect eyes from chemical splashes |
| FM | Air-purifying respirators half & full-face | Protection from airborne respiratory hazards |
| FM | Various types of respirator cartridges | Dusts fumes mists, organic vapor/acid gas, etc. |
| FM | Nitrile/neoprene gloves | Protect hands from chemical exposures |
| FM | Clay Absorbent (i.e. Oil-Dry, Kitty Litter) | Absorbent for organic solvents, oil spills |
| FM | Spill control polysorb pillows | All purpose (except Hydrofluoric Acid) |
| FM | Absorbent pads/ paper | Absorb radioactive/biohazardous spills |
| FM | Brooms, brushes, & dust pans | Clean up spilled solids. |
| FM | Drums, buckets, jugs, totes | Containerize wastes for disposal |
| FM | Polyethylene bags | Collect and dispose waste |
| FM | Impermeable red biomedical waste bags | Dispose biomedical waste |
| FM | Duct tape | Seal spill waste in bag |
| FM | ABC & CO2 Fire extinguishers | Fight small fires |
| FM | Various other instrumentation | Hazard analysis |

4.1.3 Debriefing and Review of the SPCC Plan

As soon as possible, after the release has been cleaned up, appropriate personnel from the University and any outside agencies or contractors involved shall meet to review spill response efforts. Where deficiencies are found, the SPCC Plan shall be revised and amended.

4.1.4 Disposal of Recovered Materials

UALR will properly dispose of recovered materials generated from the cleanup of any discharge or spill. UALR EHS will perform a hazardous waste determination on any recovered materials, which may require representative sampling and analysis of the materials. To the extent possible, and where feasible, free product will be recovered for recycling or reclamation. In all cases, recovered materials will be transported and disposed of in compliance with applicable laws and regulations, utilizing properly permitted transporters and disposal facilities.

5 Potential Discharge Volumes and Flow Directions

Based on storage container typical mode of use, storage location, and general area usage at this facility, Table 5-1 describes reasonable failure mode, direction of flow, predicted flow rates, and most likely quantity of oil discharged. Supporting calculations are provided directly below.

The probable flow directions are related to surface topography and the location of structures, parking lots, roadways, landscaping, and other property improvements in the local area of probable failure, and are shown on the facility diagram for this SPCC, located in [Appendix H](#).

Table 5-1 Potential Discharge Volumes & Flow Directions

| Storage Mode | Typical Failure Mode | Direction of Flow | Predicted Flow Rate | Most Likely Quantity Discharged |
|------------------------|---------------------------------------|---|---|--|
| Gas/Diesel Tank | Overflow during tank loading | Onto adjacent, impermeable ground surface then to storm drain | 55 gpm | <25 gallons ^A |
| | | contained | | building) |
| Waste Oil Tank | Overflow when manually adding to tank | Onto adjacent, impermeable ground surface then to grassy area | <1 gpm | < 1 gallon, incidental spill |
| Elevators | Leak | Into elevator closet | <1 gpm | 0 gallons (contained in building) |
| Transformers | Rupture | To concrete pad and then adjacent ground surface (grass) and then to stormwater drain | Varies depending on location of rupture | Up to entire volume of transformer mineral oil, depending on location of rupture |

6 Containment and Diversionary Structures

UALR makes every effort to prevent the discharge of oil to the environment. Discharge prevention measures include, but are not limited to, the following:

1. Use of secondary containment and drainage control;
2. Monitoring of fuel transfers;
3. Inspection and maintenance of tanks;
4. Proper storage of oil-containing containers;
5. Training of appropriate personnel.

6.1 Aboveground Storage Tanks

All above ground petroleum oil storage tanks have double-walled secondary containment systems. The University's regulated above ground storage tank is also equipped with leak detection systems that include electronic interstitial monitoring, sight gages and/or manual drain valves.

6.2 Underground Storage Tanks

UALR's only underground tanks are cathodically protected steel or epoxy walled construction, with a storage capacity of less than 30,000 gallons, used for the purpose of storing gasoline and diesel fuel for consumptive use on the premises. UALR conducts groundwater monitoring monthly and utilizes inventory and vapor monitoring practices.

6.3 Transformers

Some University-owned electrical transformers are located outside on cement or gravel pads. These transformers typically are air cooled. Oil cooled units are located inside buildings and typically do not have secondary containment; however, units are isolated from floor drains and oil loss would result in equipment failure that would be immediately detected, and such oil loss would not result in a significant discharge from the facility to navigable waters.

Sorbent materials, such as oil dry, spill pillows and spill socks are available and can be deployed from the Facilities Management for immediate response to any transformer release. A list of all of the oil-containing transformers on the UALR campus is provided in [Appendix F](#).

6.4 Elevators

All hydraulic elevators at the University are located indoors; as such, any releases of hydraulic fluid attributed to a leak or cylinder blowout would be contained in the elevator's secured vault area. These areas have concrete walls and concrete floors and are large enough to contain any release inside the building. A list of all of the hydraulic elevators on the UALR campus is provided in [Appendix F](#).

6.5 Other Equipment

Day tanks, hydraulic systems, switch gears, and other oil-containing equipment and machinery are all contained within building structures that serve as secondary containment. These systems contain small amounts of petroleum products and do not fall under the auspices of this SPCC; however, the same precautions and preventative measures that are observed for larger equipment are also observed for these systems.

6.6 Generators

UALR has several emergency generators and four non-emergency generators contained inside a power generation plant. The emergency generators are located outside and do not have secondary containment, per se. However, the belly tanks are maintained in a "full" capacity so filling the tanks is managed by topping them off monthly resulting in small amounts of fuel being acquired. Spill prevention techniques are deployed by the contractor. A list of generators & tanks can be found in [Appendix F](#).

7 Practicability of Secondary Containment

UALR uses double-walled, above ground storage tank systems for secondary containment. Spill equipment is readily available for response to any oil releases, and is the University's preferred method to prevent discharged oil from reaching navigable waters.

This overall approach is practicable, effective, and has been successfully utilized at other major universities throughout the country.

8 Inspections, Tests and Records

8.1 Regulated Storage Tanks

In the State of Arkansas, aboveground petroleum oil storage tanks with a capacity greater than 1,320

gallons and underground petroleum oil storage tanks with a capacity greater than 110 gallons are required to be certified and UALR must maintain records of the performance of monthly release detection on file for a minimum of two years.

Release detection is accomplished by a combination of audible and visual alarms and visual inspection of tank systems. Visual inspection is the preferred method of inspection for ASTs on all UALR campuses and is a standard practice at many universities.

Note: UALR maintains tank inspection records for three years to comply with the requirements of §112.7(e).

8.2 Non-Regulated Storage Tanks

UALR has one aboveground petroleum oil (waste oil) storage tank which is not regulated by the State of Arkansas. The tank is double-wall construction and a spill bucket.

8.3 Other Oil-Containing Tanks, Equipment, and Machinery

UALR also has a number of small equipment, hydraulic systems, switch gear, transformers, etc. Many of these have oil capacities of less than 55 gallons or are considered oil-filled electrical, operating, or manufacturing equipment. The SPCC regulations do not apply to containers with a capacity of less than 55 gallons, and oil-filled electrical, operating, or manufacturing equipment are not considered bulk storage containers.

Loss of oil from these systems results in equipment failures that are immediately detectable and would not result in a discharge from the facility. UALR inspects such equipment as specified by manufacturers; however, records are not retained unless required.

9 Personnel Training and Discharge Prevention Procedures

9.1 Personnel Training

Oil handling personnel at UALR are provided training, which, at a minimum, includes the following topics:

- The operation and maintenance of equipment to prevent discharges; Discharge procedure protocols;
- Applicable pollution control laws, rules, and regulations; General facility operations;
- The contents of this SPCC Plan.

9.2 General Discharge Prevention Procedures

UALR will take the following measures to reduce the likelihood of a discharge of oil to the environment:

- Require fueling operations to be continuously attended during transfers.
- Inspect all regulated aboveground storage tanks monthly using the checklists
- Promptly correct any oil leaks from tanks, piping, valves, etc.
- Promptly remove and properly dispose of any materials contaminated as a result of leaks or

spills.

- Locate all future oil storage tanks and 55-gallon drums away from drains, waterways, and flood prone areas.
- Provide all oil storage containers with secondary containment.
- Maintain fully-stocked spill kits at the hazardous waste facility for immediate campus deployment in the event of a spill.
- Post instructions and phone numbers regarding the reporting of a spill to the National Response Center and the Environmental Health & Safety office.

9.4 Truck Loading and Offloading Operations

Throughout the year, UALR receives tanker trucks and other supply vehicles for various operations that include the following:

- ✓ Refilling the gasoline UST located at the Motorpool;
- ✓ Removing used oil from the AST at the Motorpool;
- ✓ Removing waste grease from the waste food oil for the food service area;
- ✓ Refueling the AST that supply the University's non-emergency generators.

All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation.

All truck offloading operations are to be observed by UALR personnel, without exception.

9.4.1 Preparation for Offloading

UALR personnel have several duties that must be carried out prior to the offloading of petroleum or food oil containing product into storage tanks from tankers or other delivery vehicles. These include the following:

1. Ensure driver is parked on a level surface. If the parking surface has an incline, wheel chocks must be used for the duration of the offloading operation.
2. Ensure that drivers set parking brakes.
3. Verify tanker contents to ensure the correct product will be placed in the receiving storage tank.
4. Observe the hookup of hoses and confirm adequate spill response materials are available.
5. Verify the storage tank product level and free capacity prior to offloading.
6. If the receiving tank is equipped with a secondary containment drain valve or plug, make certain it is closed.
7. When offloading gasoline, ensure that a proper vehicle ground connection is made first before any other connection is made, and then connect the vapor recovery line to the storage tank.

9.4.2 Precautions While Offloading

Once offloading has begun, UALR personnel should monitor the liquid level in the tank to ensure an overflow does not occur. Also, make certain the driver stays within the line of sight of the offloading operation so a quick response can be initiated, which may include shutting off the pump, should any problems arise. Make certain, when offloading gasoline, that the tanker remains grounded at all times – the grounding line should not be removed until the very end of the offloading operation.

9.4.3 Precautions Prior to Departure

Once offloading has been completed, the total volume of product transferred to the storage tank should be confirmed. The area around the tank should be briefly surveyed to ensure there has been no overflow or leaks during the offloading process. A UALR employee must be present to observe the disconnecting of all hoses and fittings.

The driver must provide a means for collecting product lost in the disconnecting process. A bucket may be provided by UALR for this purpose if the driver does not have one available. In the case of a gasoline transfer, only after the transfer hose has been disconnected from the storage tank and the area has been properly surveyed for releases shall the vapor recovery hose and grounding line be disconnected (in that order, as appropriate, depending on the product offloaded).

Once the offloading process has been completed and the tanker has been completely disconnected from the storage tank, UALR personnel should do one final inspection to ensure the tank is secure and leak free and that the supply vehicle is not leaking.

9.4.4 Truck Loading and Offloading Emergencies

Truck valve(s) should be used to shut off product in the event of a release, regardless of the cause. Under no circumstances should the driver attempt to start and/or move the vehicle in an emergency situation without clearance from UALR EHS personnel.

In the event of an uncontrolled release, all efforts should be made to minimize and contain the release. Offloading should be shut down immediately and the discharge response procedures described in [Section 4](#) of this SPCC shall be implemented.

In the event of a catastrophic release from a tanker failure during oil transfer, trained facility personnel would implement necessary first response control measures, including deployment of booms, pigs, socks, sand bags, and any other appropriate, available materials to divert and contain the spill, until an emergency response contractor with large-scale recovery capabilities arrives.

9.5 Secondary Containment for Vehicles

Loading and offloading activities performed at the University include the offloading of gasoline fuel, hydraulic fluid, and motor oil from tanker trucks with their own pumping systems, fueling of university vehicles at the fueling station, and the removal of waste oil. Secondary containment is not provided these operations; however, spill response materials are maintained nearby in Facilities in sufficient quantities to contain a release, should one occur.

10 Security

While the University may be closed to the public in certain rare circumstances (i.e. natural disasters, civil unrest), essential personnel including, but not necessarily limited to police officers and Facilities Management workers are on duty. The University Police Department provides constant patrol of the campus and helps ensure oil storage areas remain secure.

10.1 Storage Tank Access

Major petroleum oil storage tanks are located within locked enclosures. Vehicle refueling is only done by Facilities personnel. Starter controls for fuel pump dispensers remain locked at all other times. Access to these storage tanks is limited to authorized personnel.

10.2 Elevators and Transformers Access

Elevator closets and transformers are always kept locked to prevent access by unauthorized personnel. Facilities Management has access to all elevator closets in the event of a hydraulic fluid release or other emergency situation.

10.3 Flow Valve Access

There are no flow valves on any containers or tanks that would allow direct outward flow of tank contents, causing a release to the environment.

10.4 Starter Control Access

Starter controls on the USTs and AST are accessible only to authorized personnel and shall be manually operated by UALR personnel.

10.5 Campus Lighting

UALR facility lighting is adequate to assist in the discovery of discharges occurring during hours of darkness by operating/non-operating personnel as well as the prevention of discharges occurring through acts of vandalism. Over 95% of the campus is lit in the evening, including all critical oil storage and equipment areas.

10.6 Loading Racks

UALR does not use or employ the use of tank racks.

10.7 Tank Repair and Evaluation

UALR has no field-constructed aboveground tanks.

11 Facility Drainage

UALR maintains several thousand feet of storm water drainage that is fed into Coleman Creek. Outfalls are screened periodically in dry-weather conditions to assess outfall conditions and possible elicit discharges. See Appendix I, Facility Drainage Map and further explanation in 12.3.

12 Bulk Storage Containers / Secondary Containment

12.1

All containers meet compatibility requirements for the materials being stored. In addition, temperature and pressure conditions are either maintained by indoor HVAC controls or external/integrated controls on outdoor storage units.

12.2

UALR does have bulk storage of oil products on campus that are protected by various means to include diked impervious secondary containment with drainage valve controls and double walled day tanks. 18

12.3

The diked containments are sealed by control valves kept in the closed position at all times. The containments are routinely inspected and rainwater drained as needed. Careful attention is taken to assess any oil sheens or other suspected contaminants prior to draining. If suspected release conditions exist, the operator shall notify EHS immediately for proper instruction and/or EHS intervention to remediate the contaminant and isolate and repair the source of the contaminate. In such case, records shall be kept by the EHS Office of all activities.

12.4

UALR maintains 5 underground storage tanks on campus. Only 2 tanks are in active use and are used to distribute fuel to vehicles and equipment. All tanks are cathodically protected from corrosion and are inspected monthly by monitoring wells. In addition the cathodic protection is inspected by a contractor every 2-years as required by ADEQ. All inspections are documented according to ADEQ regulations.

12.5

UALR has no partially buried or bunkered metallic tanks.

12.6

The aboveground tanks on campus are monitored and visually inspected routinely for structural integrity. If damage is identified or suspected, EHS is contacted to investigate, document, and take action as necessary.

13 Inspections

Regulated storage tanks are visually inspected monthly and monitored for leak detection per ADEQ Regulation 12. Monthly visual inspection of ASTs has proven to be sufficiently protective to identify any tank problems that could eventually result in a release, and is a mode and method of inspection that is in common use by universities.

Storage tanks are also inspected any time material repairs are made to the tank. The outside of the tanks are checked for signs of deterioration, discharges, or accumulation of oil on the tank or adjacent generator casing (as appropriate) as a part of the monthly inspection. Any necessary corrections based on the findings of the inspection are completed in a prompt manner.

14 Visible Discharges

UALR will promptly correct visible discharges which result in a loss of oil from containers, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. The university will also make every effort to keep areas around oil storage containers clean and accessible at all times.

If oil is discovered in secondary containment, an investigation will be conducted to determine whether the situation is the result of a leak or if it can be explained otherwise. The oil will be removed and properly disposed. The cause of the discharge into secondary containment will be promptly corrected, and any necessary tank system repairs will be made. An Incident Notification Form or Discharge Report Form will be filed with ADEQ.

15 Overfill Prevention Systems

Oil storage containers at UALR are provided with overfill protection either by a level indicator or by visual observation of the fill port. Based upon EPA's SPCC Inspector Guidance (August 2013) Section 3.3.3, overfill protection in the form of a basic procedure requiring visual observation of a fill port is not considered equivalent protection. An oil handling procedure is provided in Appendix??

16 Effluent treatment facilities

Grease traps are used to collect oil and grease from cooking operations in the dining facility here at UALR. The traps are arranged in series and connected by a discharge line to the sanitary sewer. A trench drain located in the dock area also leads to the grease traps. The trench drain and grease traps provide secondary containment for the outdoor grease tank. Grease traps are cleaned and maintained by a qualified contractor.

17 Visible discharges

Oil leaks from tanks, containers or equipment are promptly repaired or corrected. Accumulation of oil inside diked areas is promptly removed via pumping to waste collection drums or removed through use of oil adsorbent materials.

18 Mobile and Portable Containers

Mobile and portable containers will be kept indoors in areas away from floor drains. In the event these types of containers are used outside, they will be placed on spill containment pads and any precipitation will be promptly removed.

All spill containment pads will be of sufficient capacity to hold the full volume of the largest container in use with ample freeboard in the event of precipitation while the containment pad is holding product, generally this will be accomplished by using spill containment pads that have at a minimum 10% excess capacity.

19 Transfer Operations, Pumping, and In-Plant Processes

Underground piping at UALR is double-walled fiberglass construction with leak detection and meets the corrosion protection standards for piping in [40 CFR Part 280](#). Aboveground piping systems are visually inspected in conjunction with the inspection of bulk containers. Integrity and leak testing of buried piping is done at the time of installation, modification, construction, relocation, or replacement.

Due to the limited and protected nature of piping systems at UALR, vehicles will not endanger aboveground piping or other oil transfer operations.

Appendix A – Professional Engineer Certification

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

UALR’s Spill Containment, Control, and Countermeasure (SPCC) Plan has been reviewed and certified by a registered professional engineer per the requirements of §112.3(d).

I hereby attest that:

I am familiar with the requirements of 40 CFR 112;

I or my agent has visited and examined:

University of Arkansas at Little Rock
2801 S. University Ave
Little rock, AR 72204

The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112; Procedures for required inspections and testing have been established; and
The SPCC Plan is adequate for the facility.

Professional Engineer (PE): _____ (Print or type name.)

Signature: _____ Date: _____

PE registration number: _____ State(s): _____

Appendix B – Record of Review and Amendment & Log Sheet

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

I have completed a review and evaluation of the SPCC Plan for UALR on _____, and will will not amend the Plan as a result.
(Date) (Check one)

Complete this section only if an amendment is required.

Description of Amendment:

This Amendment is is not a technical amendment to this plan.
(Check One)

If the amendment is a technical amendment to the Plan, a registered Professional Engineer must complete the Professional Engineer’s Certification below.

Printed Name & Title Signature

SPCC Plan Amendment Review and Certification by Professional Engineer (To be completed only if a technical amendment to the Plan is required.)

By means of this certification, I attest that:

I am familiar with the requirements of 40 CFR 112;
I or my agent has visited and examined:

University of Arkansas at Little Rock
2801 S. University
Little Rock, AR 72204

The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112; Procedures for required inspections and testing have been established; and
The SPCC Plan is adequate for the facility.

Professional Engineer (PE): _____ (Print or type name.)

Signature: _____ Date: _____

PE registration number: _____ State(s): _____

Appendix C – Confirmation of Management Approval

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

UALR is committed to the prevention of discharges of oil to navigable waters and the environment.

This Plan has the full approval of management at a level of authority required to commit the necessary resources to fully implement it.

Responsible Officer: VINCE RODGERS (Print or type name.)

Title: DIRECTOR, EHS

Signature: _____ Date: 11-18-16

Appendix D – Facilities, Procedures, Methods or Equipment Not Yet Operational

At the time of execution of this SPCC, all facilities, procedures, methods, and equipment described herein were fully operational. In the event this should change in the future, this Appendix will be amended accordingly.

Appendix E – Certification of Applicability of the Substantial Harm Criteria

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

Facility Name: University of Arkansas at Little Rock Facility Address: 2801 S University Little Rock Ar 72204

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 1) 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 40 CFR 112, Appendix E, section 13, for availability) and the applicable Area Contingency Plan.

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 of 40 CFR 112, Appendix C or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

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 discharge 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 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.

VINCE RODGERS

Name (please type or print)

DIRECTOR, EHS

Title

Signature

11-18-16

Date

Appendix F – Summary of Oil Storage Locations

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

Appendix G-Site Plan

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

Appendix H – Facility Diagram

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

Appendix I – Facility Drainage

Please refer to the hardcopy of this SPCC Plan, kept in the Environmental Health & Safety Office.

Appendix J – General Loading/Unloading Procedures

UALR will adhere to the following general bulk liquid unloading procedures:

1. Load/Unload materials only when under the direct supervision of authorized facility personnel who will implement specific spill prevention and control procedures.
2. Do not smoke if you are involved with or are in the area where bulk oil transfer operations are being conducted.
3. Keep fires and potential ignition sources away from the area where bulk oil transfer operations are being conducted.
4. Before transferring oil from the vehicle, set handbrakes, emergency brakes, etc., on the bulk oil transport vehicle (cargo tank), chock wheels; and turn off the engine (unless the engine is to be used for the operation of a pumping system).
5. For loading or unloading conducted outside of containment areas, ensure immediate access to sufficient spill response materials are available to contain the entire content of the tanker truck.
6. Do not conduct outdoor loading or unloading operations during precipitation events.
7. Do not use tools that could (or are likely to) damage valves, closures, ports, etc., of the storage tank or cargo tank.
8. Prior to filling a tank, examine the lowermost drain and outlets for leakage, and make sure that they are closed. Tighten, adjust, or replace drains and outlets as necessary to prevent leakage during or after filling.
9. Persons responsible for oil transfer operations will be aware of overfill prevention systems/techniques, and will ensure that they are monitored/followed. This includes establishing that sufficient storage volume is present in the receiving tank prior to commencing unloading operations.
10. Bond (metallically connect) or ground both cargo tanks and stationary tanks in order to neutralize static charges prior to and during transfer of Class 3 flammable liquids (e.g., gasoline, diesel, fuel oil, etc.). Bond by connecting the conductor FIRST to the container that is to be filled and SECOND to the tank from which the oil is to come. Make the second connection at a point well removed from openings in the tanks or the transfer lines to prevent ignition of vapors by a discharge of static electricity.
11. Ensure that the cargo tank is attended by a qualified person at all times during loading or unloading.
 - This attendant must be awake, have an unobstructed view of the cargo tank, and be within 25 feet of the tank at all times.
 - “Qualified” means that the person (1) is aware of the hazards involved with bulk oil loading/unloading, (2) has been instructed on the procedures to be followed in emergencies, and (3) is authorized to move the cargo tank and is capable of doing so.
12. Before moving the cargo tank from the loading/unloading area, check to make sure that flexible and/or fixed transfer lines have been completely disconnected, and that valves and other closures in liquid discharge systems are closed and free of leaks.
13. Lock valves and pumps for loading and/or draining on-site oil tanks or for controlling flow from intermittently used oil tanks and piping systems in order to prevent unauthorized operation,

incidental use, or vandalism of the equipment and in order to minimize the risk of an accidental oil release.

14. Unauthorized employees will not attempt to unlock, tamper with, or use a valve or pump that has been locked.
15. The person who is authorized to unlock the device will supervise its operation (if necessary) and will be responsible for ensuring that it is relocked when the activity requiring its use has been completed.
16. Drain the loading/unloading lines to the storage tank, and close the drain valves before disconnecting the loading/unloading lines. Make sure that a drain pan or other appropriate containment device is located under connections.
17. Inspect the vehicle before departure to make sure that loading/unloading lines have been disconnected, drain and vent valves have been closed, and no leaks are evident.
18. Immediately report leakage or spillage to the Environmental Manager