

SPCC & PPC COMBINED FACILITY RESPONSE PLAN



For the
Main Campus of Robert Morris University

**6001 University Boulevard
Moon Township, Pennsylvania, 15108**

July 2013

<p>SEE TABLE 1 ON INSIDE COVER FOR FACILITY EMERGENCY CONTACT NUMBERS</p>
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TABLE 1 – List of Emergency Contacts
(NAMES IDENTIFIED ON THIS LIST ARE TO BE CONTACTED BY THE PERSON IDENTIFIED)

Contacts	Contact Description	Contact Information	Hours of Operation
FACILITIES CHAIN-OF-COMMAND			
Public Safety Department	1. CALL FIRST!!!!!! In the event of a spill or emergency, first responders shall contact Public Safety as the first emergency contact. During the emergency operations, Public Safety or the Emergency Coordinator are responsible for making emergency contacts identified on this list.	Work Phone: 412-397-2424	24 Hours
Timothy Kirsch, CIH Senior Director, Maintenance and Operations Emergency Coordinator	Public Safety (Campus Police) will contact the Emergency Coordinator in the event of a large fuel spill or leak.	Work Phone: 412-397-6282 Mobile: 412-812-1134	24 Hours
Perry Roofner, Assistant Vice President of Facilities (Alternate Emergency Coordinator)	The Senior Director, Maintenance and Operations will contact the Assistant Vice President of Facilities in the event of a spill or emergency. The Assistant Vice President of Facilities will communicate disaster incidents with Senior Administration.	Phone: 412-397-2582 Mobile: 724-996-0622	24 Hours
LOCAL OUTSIDE ASSISTANCE			
Moon Township Police / Fire Department	Call in the event that a fire or accident involves injury or if the emergency or spill impacts traffic	911 (emergency) 412-262-1113 (non-emergency)	24 Hours
Valley Ambulance Authority	Provides medical assistance and transportation	911 (emergency) 412-262-2621 (non-emergency)	24 Hours
Duquesne Light Co.	Call in the event of a transformer spill	1-888-393-7000 (Summary Account # 9001-262-217-001)	24 Hours
Dominion Peoples (Gas)	Call in the event of a gas leak or spill	1-800-764-0111 Say "Emergency" when prompted	24 Hours
Columbia Gas	Call in the event of a gas leak or spill	888-460-4332 press 2	24 Hours
PRIVATE AGENCIES			
CHEMTREC	Provides emergency response information	800-424-9300 800-255-3924	24 Hours
Poison Control Center	Poison Information and Education	800-764-7661	24 Hours
EMERGENCY RESPONSE			
Moon Township	THE EMERGENCY COORDINATOR WILL CONTACT EMERGENCY RESPONSE IF..... Release or spill is too large for facility personnel to contain and clean-up.	Phone: 911	Address: 1000 Beaver Grade Road Moon Township, PA 15108

TABLE 1 – List of Emergency Contacts/continued

<p align="center">COUNTY AGENCIES</p> <p align="center">TO BE NOTIFIED BY THE EMERGENCY COORDINATOR IN THE EVENT THAT...</p> <ul style="list-style-type: none"> Technical guidance, information, or assistance is needed regarding a spill or release. 			
Allegheny County EMA (HAZMAT)		911 (emergency) or 412-473-2550 (non-emergency)	24 Hours
<p align="center">STATE AGENCIES</p> <p align="center">TO BE NOTIFIED BY THE EMERGENCY COORDINATOR IN THE EVENT THAT...</p> <ul style="list-style-type: none"> A hazardous material spill is in excess of the reportable quantities in accordance with CERCLA; A spill of any chemical that enters the waters of the Commonwealth. 			
PA State Police	Provides traffic and crowd control	412-787-2000 or 911	24 Hours
PADEP	Call the PADEP hotline and notify the PADEP Regional Offices in writing of any spill or releases at this facility.	412-442-4000	24 Hours
PA Fish & Boat Commission	The Reportable Spill Hotline should be used in the event of a spill or release.	800-854-7365	24 Hours
PEMA	PEMA will provide guidance and information in the event of a spill or release.	724-357-2990 or 800-972-7362	24 Hours
<p align="center">FEDERAL AGENCIES</p> <p align="center">TO BE NOTIFIED BY THE EMERGENCY COORDINATOR IN THE EVENT THAT A SPILL...</p> <ul style="list-style-type: none"> Violates applicable water quality standards; Causes a film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines; or Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines. 			
U. S. Coast Guard, Marine Safety Office, Pittsburgh	In the event a waterway has been impacted by a spill or release.	800-253-7465	24 Hours
<p align="center">TO BE NOTIFIED BY THE EMERGENCY COORDINATOR IN THE EVENT THAT A SPILL...</p> <ul style="list-style-type: none"> Single spill incident greater than 1,000 gallons of oil into navigable waters. Two reportable oil spills of more than 42 gallons within any 12-month period. 			
National Response Center (NRC)	Reportable Spill Hotline	800-424-8802	24 Hours
EPA Region III	Administers the EPA Region III Oil Program	Regional Response Center: 215-814-9016 SPCC Hotline: 215-814-3452 Address: 1650 Arch Street, Office of Enforcement, Oil and Prevention Branch (3HS61) Philadelphia, PA 19103-2029	24 hours

If the Emergency Coordinator (EC) determines that the facility has had a reportable release, as defined in **Table 1**, the EC must notify the Department of Environmental Protection; the National Response Center or the EPA Regional Administrator; and the Pennsylvania Emergency Management Agency; and provide the following information:

1. Name of the person reporting the incident,
2. Facility name, location, and contact information,
3. Facility description, including maps, flow diagrams, and topographical maps,
4. Facility maximum storage or handling capacity,
5. Date, time, and location of the incident,
6. A brief description of the incident, nature of the materials or wastes involved, extent of any injuries, and possible hazards to human health or the environment,
7. The estimated quantity of materials or wastes spilled, and
8. The extent of contamination of land, water, or air, if known.

PLAN REVIEW AND SIGNATURE PAGE

In accordance with 40 CFR 112.5 (b), the Robert Morris University Emergency Coordinator/Senior Director, Maintenance & Operations should complete a review and evaluation of this Combined Spill Prevention, Control and Countermeasure (SPCC) and Preparedness, Prevention, and Contingency (PPC) Plan (Combined Facility Response Plan) at least annually and updated as needed, or as required by Section 7.4 of this Plan. The plan will be overseen by the Emergency Coordinator (EC) and the original/master copy of the site plan will be stored in the EC's office.

By signature, I certify that I have reviewed and approved this Combined Spill Prevention, Control and Countermeasure (SPCC) and Preparedness, Prevention, and Contingency (PPC) Plan (Combined Facility Response Plan) for the Main Campus of Robert Morris University on the date indicated, and find that no amendments to the Plan are required. A Professional Engineer must certify any technical amendments made to this Plan. The review is documented below.

SIGNATURE

DATE

PROFESSIONAL ENGINEER CERTIFICATION
(40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Integrated Preparedness, Prevention, and Contingency Plan, including Spill Prevention, Control, and Countermeasure Plan requirements, has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this Integrated Plan in accordance with the requirements of 40 CFR Part 112.

Signature

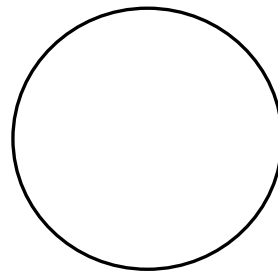
Date

Kevin L. Little
Name of Professional Engineer

07/12/2013

PE076484
Registration Number

Pennsylvania
Issuing State



**MANAGEMENT’S FULL APPROVAL TO COMMIT RESOURCES
(40 CFR 112.7)**

Robert Morris University (RMU) is committed to maintaining the highest standards for preventing discharges of oil to navigable waters and the environment through the implementation of this PPC/SPCC Plan. This Plan has the full approval of RMU management and RMU’s management has committed the necessary resources to implement the measures described in this Plan.

Mr. Tim Kirsch, CIH is the Designated Person (Emergency Coordinator) Accountable for Oil Spill Prevention at this facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative:

Signature: _____

Title: _____

Date: _____

**CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION
(40 CFR 112.20(e), 40 CFR 112.20(f)(1))**

Facility Name: **Robert Morris University, 6001 University Blvd.
Moon Township, Pennsylvania, 15108**

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 ☒

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 storage tank area?

Yes ☐ 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) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes ☐ 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) such that a discharge from the facility would shut down a public drinking water intake?

Yes ☐ No ☒

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ☐ No ☒

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

Title

Name (type or print)

Date

Cross-Reference with SPCC Rule

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* Indicates relevant provisions, for a complete list of SPCC requirements, refer to the full text of 40 CFR Part 112.

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1.0 INTRODUCTION

This Combined Spill Prevention, Control and Countermeasure (SPCC) and Preparedness, Prevention, and Contingency (PPC) Plan (Combined Facility Response Plan) has been prepared to help prevent emergencies and accidents and to provide effective and efficient response to emergencies and accidents that may occur at Robert Morris University (RMU) facilities.

This Combined Facility Response Plan describes the practices, procedures, structures, and equipment utilized by site personnel to prevent spills at RMU facilities and to help eliminate or reduce harmful effects to human health and the environment. This Plan also documents and identifies personnel responsible for responding to a site spill, steps and procedural measures to report a spill, site procedures to prevent spills, steps to prepare for a spill response, and countermeasures to contain, cleanup, and mitigate the effects of a spill.

This Combined Facility Response Plan fulfills the requirements for SPCC and PPC Plans as governed and mandated by Federal and state regulations. The master copy of the Plan will be stored in the Emergency Coordinator's (EC) office.

1.1 Purpose and Objectives

The Combined Facility Response Plan will be used as a guideline for procedures to be followed when responding to discharges of oil or hazardous substances within the confines or originating from the facility. The Plan will also serve as a procedural guidebook for site personnel to follow to help prevent discharges of oil and hazardous substances, to respond to a site spill, procedures to follow in identifying and reporting a release, and countermeasures to contain the release, and ultimately assist site personnel in cleaning up the waste and disposing of it.

The Plan will be kept current to reflect changes in operations or regulatory requirements. The signature page, located at the front of this plan, identifies the key Robert Morris University personnel who have been tasked with the oversight and revisions of this plan. At a minimum, the plan should be reviewed annually by the site Emergency Coordinator (EC) and updated, as needed. The EC is the Senior Director, Maintenance & Operations at the main campus, and has a role comparable to that of the Emergency Coordinator in the PPC Plan. Updated sections will be incorporated into the plan and signed by the EC. Copies of the revised/updated plan will be provided to the same outside agencies that received a copy of the original Combined Facility Response Plan.

The objectives of the Combined Facility Response Plan were developed in accordance with current United States Environmental Protection Agency (USEPA), Pennsylvania Department of Environmental Protection (PADEP), Occupational Safety and Health Administration (OSHA), and local government requirements when considering the prevention, containment, mitigation, and cleanup of oil and hazardous substance spills and releases. The Plan establishes the responsibilities, duties, and key resources to be employed in the event of an accidental release. The plan will also define an organized, planned, and coordinated course of action to be followed in case of fire, explosion or discharge of a hazardous substance that could threaten human health or the environment.

1.2 Site Description and Background Information [40 CFR 112.7(a)]

This section provides a brief background of the site setting, site activities and operations, site security, spill history, identification of spill areas, and identification of drainage pathways and distance to navigable waterways.

1.2.1 Site Description and Location

The Main Campus of Robert Morris University is located at 6001 University Boulevard in Moon Township, Allegheny County, Pennsylvania. The campus consists of classroom buildings and dormitories, athletic fields, and paved parking areas. No manufacturing processes are conducted at this site.

Figure 1 – Facility Location Map (pg. 3) includes a 7 ½ minute USGS Quadrangle Map that identifies the approximate location of the facility. **Figure 2 – Facility Layout and Surface Drainage Map** (pg. 4) provides a facility layout and surface drainage map of the Main Campus of RMU.

Storm water originating from parking lots, roof drains, and storage areas flows into an underground storm water collection system and is subsequently discharged to the storm water collection system for Moon Township. Building floor drains in the maintenance area connect with a sub-grade drainage system which discharges to the Moon Township storm water collection system. The nearest water body to this site is the Ohio River and can be found approximately 1 mile northeast of the site.

1.2.2 Site Security [40 CFR 112.7(g)]

The campus police and Public Safety Department is located in the Barry Center, on the south side of the campus. Public Safety performs routine patrols throughout the campus.

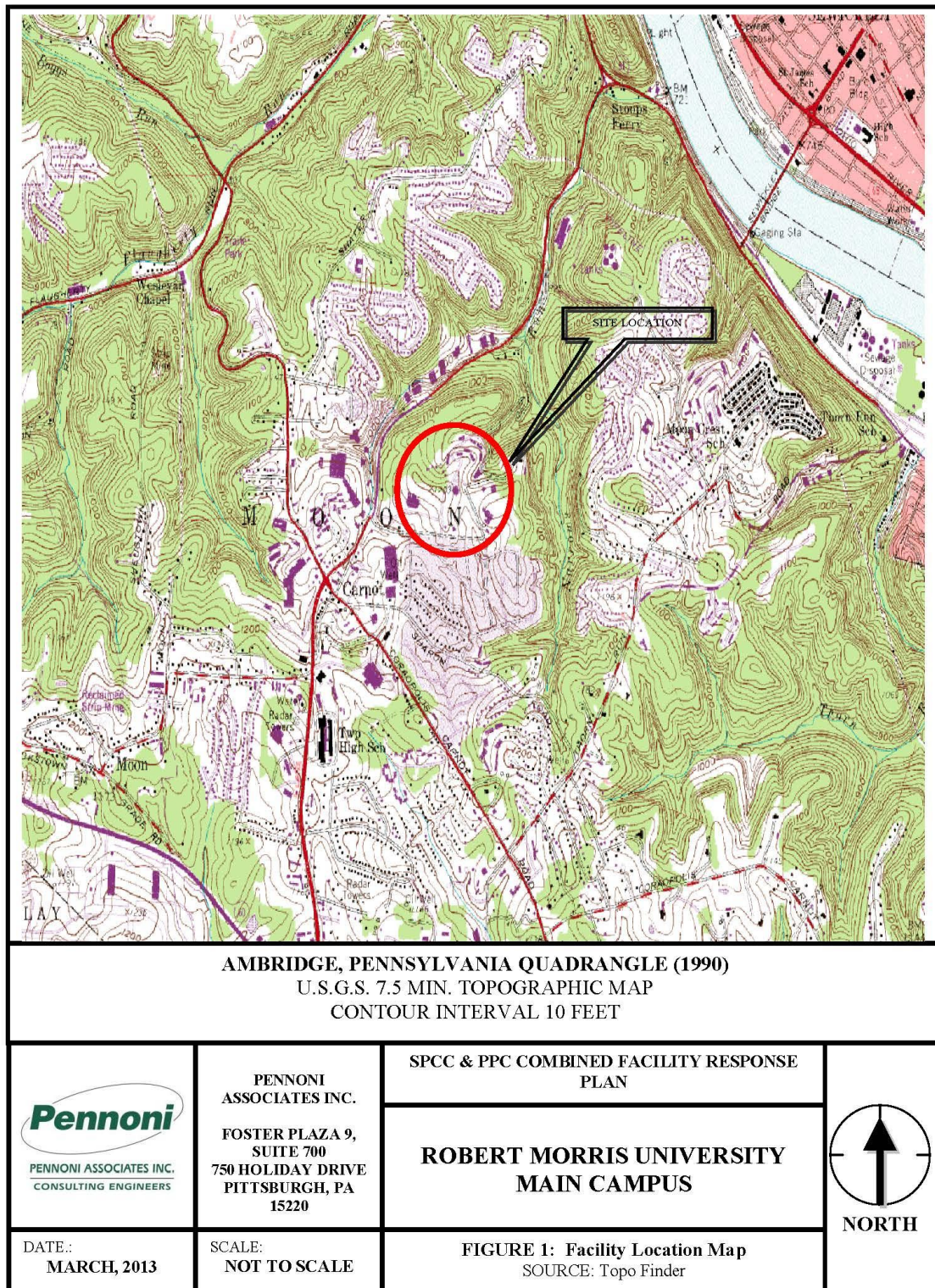
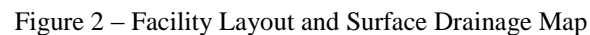


Figure 1 – Facility Location Map



1.2.3 Site Storage Inventory [40 CFR 112.7(a)]

A 300-gallon, diesel fuel aboveground storage tank (AST) is located above the Washington Hall generator building, southwest of Washington Hall. A 300-gallon diesel AST is located outside on the south side of the Lafayette Center, within the generator unit. A 135-gallon diesel AST is located within the generator unit in the Patrick Henry generator building. Emergency generator units at Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Business School, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, and the Wheatley Center utilize a fuel tank located within the generator units. Various chemicals, such as glues, adhesives, and paints, are stored in buildings throughout the campus, but are primarily found in the Facilities Service Center. There are sixteen (16) pad-mounted transformer units, owned by Duquesne Light Co., located throughout the campus.

These ASTs are detailed in **Table 2** and their corresponding locations are presented in **Figure 2**. Hard copies of the Material Safety Data Sheets (MSDS) are maintained by the departments and are available via the Robert Morris Office of Facilities Management Safety at Robert Morris website (<http://rmu.edu/safety>). The site personnel who oversee and regularly inspect the facility's material and waste inventory will update the MSDS master binder, located in the Facilities Operations office as changes are made to the sites inventory.

Table 2 – Material and Waste Inventory presents a material and waste inventory of oil and non-oil materials managed at the facility which have the potential for causing environmental degradation or endangerment of public health and safety through accidental release. The designated site personnel identified in **Table 1** will be responsible for the oversight of the material and waste inventory for this facility (**Table 2**).

TABLE 2 – MATERIAL AND WASTE INVENTORY

Material/Waste (non-oils)	Storage Location	Normal Inventory
Paint	Facilities Service Center	500 gallons
Athletic Field Line Paint	Facilities Service Center	75 gallons
Paint Thinner/Remover	Facilities Service Center	5 gallons
Acetylene	Facilities Service Center	5 cylinders (sizes vary)
Oxygen	Facilities Service Center	5 cylinders (sizes vary)
Propane	Facilities Service Center	5 cylinders (sizes vary)
Sodium (Salt)	Facilities Service Center	500 pounds
Portland Cement	Facilities Service Center	250 pounds
TOTAL		580 Gallons/750 Lbs./ 15 Gas Cylinders

Materials/Waste (Oils)	Storage Location	Normal Inventory
Oils (pad-mounted transformer units)	Throughout campus (see Figure 2 for locations)	(1) 150 KVA (1) 225 KVA (5) 300 KVA (6) 500 KVA (3) 750 KVA (no volumes available)
Hydraulic Fluid (Elevator)	Braddock Patrick Henry Sewall Center Massey Hall Hale Center Athletic Building Concord (Small) Concord (Large) Student Center -Elevator #1 -Elevator #2 -Elevator #3 -Elevator #4 John Jay Lexington Salem Hall Wheatley Center Business School Yorktown	80 gallons 175 gallons 150 gallons 150 gallons 175 gallons 62 gallons 158 gallons 192 gallons 239 gallons 239 gallons 165 gallons 337 gallons 330 gallons 220 gallons 80 gallons 80 gallons 80 gallons Non-oil elevator
TOTALS		2,912 Gallons

Table 2 Cont. – Material and Waste Inventory

Materials/Waste (Oils)	Storage Location	Normal Inventory
Diesel Fuel	Tank 01 – within the Facilities Service Center generator unit	One 600-gallon tank
	Tank 02 – above Washington Hall Generator Building	One 300-gallon tank
	Tank 03 – within Lafayette generator unit	One 366-gallon tank
	Tank 04 – within the Patrick Henry generator unit	One 194-gallon tank
	Tank 05 – within the Concord Hall generator unit	One 366-gallon tank
	Tank 06 – within the Salem Hall generator unit	One 1,700-gallon tank
	Tank 07 – within the Athletic Building/Joe Walton Stadium generator unit	One 145-gallon tank
	Tank 08 – within the Business School generator unit	One 126-gallon tank
	Tank 09 – within the Franklin Center generator unit	One 366-gallon tank
	Tank 10 – within the Hale Center generator unit	One 600-gallon tank
	Tank 11 – within the Wheatley Center generator unit	One 308-gallon tank
TOTALS		5,071 Gallons
Date Inventory Completed: February 2013		
Inventory Completed By: Tim Kirsch		

1.2.4 Spill History Information

According to a review of site records and interviews with site personnel, there have been no recorded spills or leaks of chemicals or petroleum products on this site. In the event of a spill, the facility must submit this Plan to the appropriate EPA Regional Administrator and state agency in charge of oil pollution control if either of the following occurs:

1. Single spill incident greater than 1,000 gallons of oil into navigable waters.
2. Two reportable oil spills of more than 42 gallons each within any 12-month period.

Discharge information must be reported to the PADEP in a written report within 15 days of the incident if either of the above thresholds are reached. The report shall contain the following information:

- Facility name and location;
- Facility owner or operator names;
- Facility maximum storage or handling capacity and normal daily oil throughput;
- Facility description, including maps, flow diagrams, and topographical maps;
- The cause(s) of the spill, including a failure analysis of system or subsystem where the failure occurred;
- The corrective actions and/or countermeasures taken (e.g., equipment repairs or replacement);
- Any other preventive measures taken; and
- Other information the Regional Administrator may require.

In addition, other spill/release situations may warrant reporting to various state or Federal agencies. Please see **Table 1 – List of Emergency Contacts** for specific information.

1.3 Existing Emergency Response Plans

RMU currently has an Incident Command & Communications Plan that establishes responsibilities in the event of an emergency or disaster affecting the University, its students, faculty or staff, including policies and procedures for managing communications during and immediately following such situations. This plan provides a framework for appropriate responses to various types and levels of emergency situations that may arise. Procedures and processes within the scope of this plan are intended to reduce risk to human life, protect the environment, preserve property, minimize danger, promote recovery and restore university operations.

1.4 Identification of Potential Spill Areas

A potential spill area is an area or storage location that could produce a given spill in excess of 55 gallons. Potential spill areas throughout the site are summarized in **Table 3** and include the diesel fuel ASTs located at:

- Washington Hall
- Lafayette Center
- Patrick Henry
- the Facilities Service Center
- Concord Hall, Salem Hall
- the Athletic Building/Joe Walton Stadium,
- Franklin Center, the Business School
- Hale Center,
- Wheatley Center,
- Paint and solvent storage area - Facilities Service Center,
- 16 pad-mounted transformer units (owned by Duquesne Light Co., located throughout the campus)

See **Figure 2 – Facility Layout and Surface Drainage Map** on Page 4 for the location of potential spill areas. Flammable materials in storage cabinets are not included as potential spill areas because a spill of 55-gallons or more is not likely to occur.

Site-specific spill contingency plans containing instructions for responding to spills have been prepared for each of these areas. **Table 3** lists the potential spill areas along with the page number where each site-specific contingency plan can be found:

TABLE 3 – POTENTIAL SPILL AREAS

Potential Spill Areas	Substances Stored	Plan Page #
Aboveground Storage Tank Areas	Diesel fuel	22
Paint and Solvent Storage Area – Maintenance Facility	Paint and solvents in stock yard used by road painting crew	24
Pad & Pole-Mounted Transformers – Refer to Figure 2 – Facility Layout and Surface Drainage Map for specific location of drainage for each transformer	Transformer Oil (Non-PCB contaminated)	25
Elevator Hydraulics (throughout campus)	Hydraulic Fluids	26

If there is a spill at one of the sites listed in **Table 3**, go to the site-specific spill contingency plan in Section 4.4 for response instructions.

Potential spill scenarios include:

- Spill and release due to tank rupture, leakage, or failure; and
- Spill and release when refilling fuel tank from a tank truck

Spill prevention and containment features include:

- Venting capacity suitable for fill and withdrawal rates;
- Tanks checked for capacity prior to being filled;
- No loose combustible material, empty or full drums are permitted in containment areas;
- Hoses and fittings checked for proper connection before unloading/loading begins;
- Labeling or signage indicates the tank contents; and
- Spill response equipment (booms, sorbent pads, etc.) is stored throughout the Facilities Service Center.

2.0 DESCRIPTION OF PLAN IMPLEMENTATION

This section contains information on the organizational structure for implementation of the Combined Facility Response Plan, list of emergency contact and chain-of-command information in the event of an emergency, and duties and responsibilities of the On-Scene Coordinator.

2.1 Organizational Structure of Site for Plan Implementation

RMU has designated certain individuals with the responsibility for implementing, maintaining and updating the Combined Facility Response Plan. The Plan should be reviewed and updated on an annual basis or as needed to reflect any changes at the site, but will be reviewed and certified once every five (5) years by a Registered Professional Engineer.

If the Plan fails in an emergency, the Plan will be reviewed and revised to meet the sites need(s).

2.2 List of Emergency Contacts and Chain-of-Command [40 CFR 112.7(a)(3)(vi)]

In an emergency, contact the listed emergency contacts in the order shown in **Table 1 – List of Emergency Contacts**. The list is the order in which they will assume responsibility as alternates. One (1) of the listed persons will be on-site or on-call to act as the emergency coordinator. This list will be posted on bulletin boards within the facility so that the On-Scene Coordinator can be contacted in the event of an emergency.

The outside contractor listed in **Table 1** may be contacted at the discretion of the On-Scene Coordinator in the event that departmental forces cannot resolve the situation.

2.3 Duties and Responsibilities of the Emergency Coordinator [40 CFR 112.7(a)(4)]

This section discusses the duties and responsibilities of personnel who are involved with the management and/or the implementation and oversight of the Combined Plan.

2.3.1 Responsibilities of Site Personnel [40 CFR 112.7(f)(2)]

Emergency Coordinator (EC)

The EC determines the human and equipment resources required to respond to a spill based on an assessment of the magnitude of the spill and coordinates spill response efforts between the PADEP and the Moon Township Police Department, the fire department, and municipal authority. The EC oversees and monitors the spill response to ensure that response teams take appropriate actions to prevent threats to human health or the environment.

The EC is responsible for identifying the character, source, amount, and the extent of the release, as well as other items needed for notification. The EC must determine the type and quantities released and must be able to implement certain actions to prevent further release and contain what has already been released.

The EC is responsible for activating internal alarms and hazard communications to notify all site personnel of an emergency. The EC must assess the risk to human health and the environment. The EC should be a full-time employee with the training required to manage a spill or release.

The EC is responsible for coordinating the effort in the containment, control, and cleanup of a spill. The EC will be responsible for maintaining the Combined Plan and updating the plan when there are changes to applicable Federal, state, and local regulations regarding releases of oil and hazardous substances. This person will be responsible to review the plan every five (5) years to verify if action identified in the plan are still applicable with activities conducted at the site. Further, the EC will review and amend the Combined Plan whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of chemicals into or upon navigable waters. As personnel are assigned a role or responsibility change, the OSC will need to assign those responsibilities to new personnel and assure that the plan is updated accordingly.

Alternate EC

The Alternate EC assumes all responsibilities of the EC if he/she is not readily available.

3.0 SPILL AND RELEASE PREVENTION

3.1 Pre-Release Planning

The primary sources of possible pollutants (including waste) are listed below with the pollution incident prevention practices also indicated.

3.1.1 Aboveground Storage Tanks (ASTs)

Figure 2 – Facility Layout and Surface Drainage Map presents the location of the ASTs on this facility. The following summarize the standard setup and maintenance of the ASTs.

- All tanks are double-walled or are contained within a generator unit.
- Venting capacity suitable for fill and withdrawal rates.
- No loose combustible material, empty or full drums are permitted within containment areas.
- Hoses and fittings checked for proper connection before unloading/loading begins.
- Tanks comply with Underwriters Laboratories construction specifications.
- Tanks checked for capacity prior to being filled.
- Labels with tank contents, safe heating temperature, and no smoking signs are on the tank structure.
- Fire extinguisher is located within 50 feet of the tank and accessible.
- Emergency telephone located within 50 feet with list of emergency contacts.

3.1.2 Paints and Solvents

- Paints and solvents are stored in the Paint Room of the Facilities Service Center.
- The line paint for athletic fields is a water-based type of paint.

3.1.3 Pad and Pole-Mounted Transformers

- All transformers are owned and maintained by Duquesne Light Co.
- Oils associated with transformers are operated and maintained by Duquesne Light Co.
- Only authorized, trained and knowledgeable personnel handle transformer oil.

3.1.4 Hydraulic Fluids for Elevators

- All elevators are maintained by Thyssen Krup Elevator, Marshall Elevator, and Shindler Elevator.
- Hydraulic fluids associated with elevators are stored inside the elevator workings and single walled reservoir tanks for each elevator throughout the campus.
- Only authorized, trained and knowledgeable personnel handle hydraulic fluids.

3.2 Material Compatibility

Personnel refilling an AST must verify tank contents prior to filling. The construction of the ASTs has been designed to be compatible with their contents. The tanks have also been designed with thermal and corrosion protection.

All environmentally sensitive materials are stored in appropriate containers, tanks, enclosed structures, and containment. Compatible waste materials are stored together in approved waste storage containers. Non-compatible wastes are to be segregated and not mixed (i.e., corrosive materials are stored separate from flammable materials) with other non-compatible waste materials.

3.3 Preventive Maintenance

A preventive maintenance program is in place for equipment and tanks containing environmentally sensitive materials. According to 25 Pa. Code § 245.513, the owner/operator shall assure that a maintenance and general operations check of the storage tank system is performed at least monthly. The maintenance and general operations checks pertaining to the storage tanks of the emergency generators are conducted during the monthly generator testing activities completed by approved RMU contractors. Any deficiencies noted during the check are to be identified and will be corrected. Completion of monthly emergency generator testing documentation by the RMU contractor will be used to document the monthly operations and maintenance checks of the aboveground storage tank. The operations and maintenance check shall include:

- A visual examination of the tank system for deterioration, including, but not limited to, the tank, piping, ancillary equipment, foundation and safety equipment.
- A check of the containment areas for accumulation of water and removal of water as necessary.
- Confirmation that containment drain valves are secured in the closed position when not in use.
- Monitoring of the leak detection system.
- A check of vents for restrictions.
- A check of ancillary equipment for operational malfunctions.
- An investigation of conditions that may be a fire or safety hazard, or pose an environmental hazard.
- Observation for evidence of a release of regulated substance from the tank system.

Signs of deterioration, leaks which might cause a spill, weak tank supports, and cracked foundations noted during the monthly emergency generator testing should be noted by the RMU contractor and brought to the attention of the OSC and Equipment Manager.

3.4 Housekeeping Program

- Small spills are quickly cleaned up with absorbent materials (pads, socks, pillows, loose absorbent, etc.) and collected for proper disposal.
- Specific areas of the facility have been designated for the storage of environmentally sensitive materials. Materials are stored in a neat, orderly fashion in approved containers.
- Regular refuse pick up and disposal is conducted.
- Regular inventory and disposal of hazardous or residual waste is conducted.

3.5 External Factors Planning

Factors that could have serious impact on the public health and employees of the facility would be a fire or explosion. In the event of such an occurrence, the appropriate agencies would be immediately contacted. Flooding, power outages, or snowstorms would have minimal impact or effect on operations conducted at this facility.

3.6 Employee Training Programs [40 CFR 112.7(f)(1)]

The training program at this facility was designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment systems including, where applicable: procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment; key parameters for automatic cut-off systems; communications and alarm systems; response to site spills and fires; site evacuation procedures; and shut down of operations.

The following training is provided to the appropriate employees:

1. *First Responder/Hazardous Material (Awareness Level)*: The Occupational Safety & Health Administration (OSHA) requires, under 29 CFR Part 1910.120, that certain workers who are likely to witness or discover a hazardous material release receive annual training on what to do if you are a first responder to a hazardous material incident.
2. *Right-To-Know*: Based on the requirements of The Right-To-Know Law (Act 159 of 1984), an employee has a legal right to know the identity of hazardous substances used in the workplace and the health hazards posed by exposure to these substances. Training is provided to every Department employee that uses, handles, or is exposed to hazardous substances in the workplace.
3. Training records with adequate documentation are maintained for all employees. The facility training coordinator will maintain copies of training records.

4.0 SPILL RESPONSE PROCEDURES [40 CFR 112.7(a)(3)(iv), (v)]

This section provides spill response procedures for facility personnel to follow in the event of a small and large release, and information for containment, cleanup, and disposal practices that may apply in the event of a release. This section also provides site personnel with step-by-step site-specific spill contingency plans to follow in the event of a spill or release at the facility.

4.1 Spill Response Procedures

When you discover a spill, determine whether the spill is small or large and whether you can respond to it.

A SMALL SPILL IS WHEN....	A LARGE SPILL IS WHEN....
<p>Personnel can respond to with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The OSC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p> <p><i>Follow the Small Spill Response Procedures on Page <u>17</u>.</i></p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. An example of this would be the rupture of an AST. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained and should not clean up large spills.</p> <p><i>Follow the Large Spill Response Procedures on Page <u>18</u>.</i></p>

SMALL SPILL RESPONSE PROCEDURES

4.1.1 Small Spill Response Procedures

If the spill is **SMALL** and **HAS NO OBVIOUS HEALTH THREATS** (fire, explosion, vapor, inhalation, etc.), then proceed as follows:

1. **STOP THE FLOW** of the spill or release immediately. Turn off all sources of ignition (e.g., motor vehicles, tractors, heaters, burners, electrical equipment). If you feel this action is too dangerous and may expose you to an obvious health threat (e.g., fire, explosion, and vapor inhalation), evacuate the area and report the spill as indicated below.
2. **NOTIFY THE OSC** – See **Table 1** for notification protocol in the event of an emergency release.
3. **DETERMINE THE NECESSARY PROTECTIVE CLOTHING** Always review the MSDS sheets or NIOSH pocket guide to determine the necessary clothing to be worn prior to responding to a small spill. At a minimum, put on the following personal protective equipment:

- Safety Glasses
- Gloves
- Rubber Boots
- Protective Aprons.



4. **CONTAIN AND CONTROL THE VOLUME OF THE SPILL FROM SPREADING**
 - Place absorbent materials around the perimeter of the spill to prevent it from spreading.
 - Place absorbent materials on top of the spill to help reduce the volume.
5. **ABSORB THE REMAINDER OF THE SPILL**
6. **DISPOSE OF THE ABSORBED MATERIALS** in accordance with the RMU Waste Disposal Policy.
7. **COMPLETE and DOCUMENT THE RMU INCIDENT INVESTIGATION FORM** found in the Safety Management Section of the Incident Investigation and Recordkeeping Policy.

LARGE SPILL RESPONSE PROCEDURES

4.1.2 Large Spill Response Procedures

If the spill is **LARGE** or **HAS OBVIOUS HEALTH THREATS** (fire, explosion, vapor, inhalation, etc.), then proceed as follows:

1. EVACUATE THE AREA

2. NOTIFY THE OSC. See **Table 1** for notification protocol in the event of an emergency or release.

3. CONTAIN THE SPILL

In some situations, depending upon the nature and magnitude of the spill, it may be prudent to contain the spill before giving notification. If there is any potential of harm to human health from a fire, explosion, or vapor inhalation, evacuate the area and wait for the fire company and other emergency response members to show up. The following are steps to follow when trying to contain a spill:

- Immediately block off entrance to storm/sewer inlets using sand bags, solid absorbent materials, soil, etc.
- Don PPE if coming in contact with or in the immediate area of the spill/release. Use absorbent materials to retard/stop flow of spill. Construct dikes around the area of spill using sand or soil if necessary.
- Establish fire preventative measures in the vicinity of the spill.

4. FURTHER INCIDENT NOTIFICATIONS

The OSC will determine the severity of the spill and, if necessary, will contact other agencies as identified on **Table 1**.

5. COMPLETE and DOCUMENT THE RMU INCIDENT INVESTIGATION FORM found in the Safety Management Section of the Incident Investigation and Recordkeeping Policy.

4.2 Containment, Cleanup, and Disposal Practices for Spills

A number of advanced response mechanisms are available for controlling oil and hazardous materials spills and minimizing their impacts on human health and the environment. The key to effectively combating spills is careful selection and proper use of the equipment and materials best suited to the type of spill and the conditions at the spill site.

Containment



Only try to contain a spill if you can do so without placing yourself or others at risk for personal injury. USE PERSONAL PROTECTIVE EQUIPMENT.

1. Attempt to stop or slow the source to prevent any further release:
 - Close valves and turn off power to pumps
 - Upright containers or roll them over so the hole is facing upward
 - Place leaking drums in compatible DOT-approved overpack drums
 - Patch holes or transfer material from a leaking container to another container
 - Move container to a location where it poses less of a threat.
2. Use absorbent materials or build a dike or dam to stop or slow the spread of the spill:
 - *Absorption* is a process in which sorbents such as sawdust, clays, charcoal, or synthetic products (i.e., pigs, pillows, etc.) absorb or hold liquids. Sorbents can block or absorb a spill. The absorbent you select depends on the material spilled. Only use an absorbent that is marked as compatible with the hazard class of the spilled material (check the material's MSDS for guidance).
 - *Dikes, dams, diversions, and retention* physically prevent or reduce the quantity of liquid flowing into the environment. Dikes or dams usually refer to earth, synthetic products (pigs, pillows, etc.), or other barriers temporarily constructed to hold back the spill or leak. Booms, curtains, and skimmers are primarily used where a spill reaches water, and divert (physically change) the direction in which the released materials flow. Sewers can also be blocked to keep materials from flowing into them.

Cleanup



You may be injured if you try to clean up a spill beyond your capability. Employees of the facility may follow the Small Spill Response Procedures on page 17 of this plan if the spill causes no obvious health threats (ex: leaking 55-gallon tank). The Emergency Coordinator must assess the threat and determine whether the cleanup can be performed in-house or if contractor assistance is needed for a large spill (ex: rupture of a tank).

Absorption, pumping, or industrial vacuuming can remove spills in secondary containment. If spills escape secondary containment, use one of the following methods to clean up the spilled material:

Contaminant on or in Water: If material is floating on the surface of the water, use absorbents to skim it off. Store the waste in appropriate containers.



Only attempt to clean contaminant out of water if it is a small, contained amount of water on an impervious surface. For larger amounts of water or if the contaminant is soluble in water, call a private contractor.

Contaminants on pervious surfaces (such as soil): Pump, drain, absorb, or scoop free-floating material into a container. Take care that flammable or combustible material is not processed in a manner that it can be ignited. Scoop or shovel contaminated media (soil, gravel, etc.) into a DOT-approved container for disposal, separating liquids from solids.

Contaminants on impervious surfaces (such as concrete): Pump, drain, absorb, or scoop free-floating material into a container, separating liquids from solids. Take care that flammable or combustible material is not processed in a manner that it can be ignited. Soak up residual contaminants with absorbents and place them in a DOT-approved container for disposal.

- Outdoor cleanup – do not use wet cleaning methods (hot water or steam with or without detergent).
- Indoor cleanup – dry cleaning methods are preferred. Wastewater must be disposed by a contract vendor.

Disposal

You must dispose of contaminated media, residue, and cleanup materials properly. All spill material is typically handled as waste, although in some instances recovered product can be reused. For hazardous waste, follow the facility handling, accumulation, and disposal requirements and/or consult with the Emergency Coordinator.

4.3 Disposal of Spill Residue

The outcome of any spill cleanup is the disposal of the absorbent cleanup materials and soils contaminated from accidental spills. All cleanup materials should be handled as if it was a hazardous material.

Upon notification of a spill or release, cleanup operations also incorporate disposal as part of the procedure. Excavated soil may be stockpiled on plastic and covered securely until proper sample analysis can be completed to assist personnel in the classification and characterization for off-site disposal. Smaller amounts of contaminated soil, along with other sorbent materials may be placed into 55-gallon drums.

These drums may be disposed of by the clean-up contractor or disposed of through a contracted waste disposal company certified to handle and properly dispose of petroleum contaminated waste materials.

The Emergency Coordinator will direct site personnel to clean minor spills/releases caused through normal maintenance and facility operations. The Emergency Coordinator will direct site personnel to clean up these small spills, using available absorbent materials rated for the type of material that has been spilled. Depending on the nature of spill and the amount of disposal residue generated, these absorbent materials may need to be disposed of as a hazardous material. The contracted emergency response consultant will assist the Emergency Coordinator on how the disposal residue should be handled.

If a minor spill or release occurs consisting of hazardous substances other than oil or petroleum, disposal procedures will be the same as long as the substance can be absorbed quickly and efficiently without creating a risk to health or the environment. The Emergency Coordinator will be responsible for notifying the clean-up contractor for disposal of larger spills/releases cleanup residues.

4.4 Spill Contingency Plans for Potential Spill Areas

If there is a spill at a potential spill area described in Section 1.4 of this plan, go to the three-page spill contingency plan developed for that potential spill area and follow the directions on those pages.

Each of the following site-specific spill contingency plans in combination with the Small and Large Spill Response Procedures found on page 18 of this plan contains the following information:

- Spill response procedures.
- Name and phone number of the On-Scene Coordinator and Alternate On-Scene Coordinator.
- Diagram showing potential spill site and surface flow direction (see Figure 2 – Facility Layout and Surface Drainage Map).
- Secondary containment structures and drainage destinations.
- Types of materials present.
- Cleanup procedures.

If there is a spill at a location other than one of the identified potential spill sites, go to the *General Spill Response Procedures* at the beginning of this section.

Aboveground Storage Tank Spill Plan

(Copy maintained at Maintenance Facility)

CONTAINMENT: A 300-gallon aboveground diesel fuel tank is located above the Washington Hall generator building, southwest of Washington Hall, and is entirely enclosed in concrete. A 300-gallon aboveground diesel fuel tank is also located outside the south side of the Lafayette Center, within the generator unit. Generator units at Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Business School, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, and the Wheatley Center utilize a fuel tank located within the generator units



DRAINAGE: If a spill were to occur at the tank within the generator unit behind Lafayette Center, the spill would most likely be contained within the unit, but could possibly flow to the surrounding grassy area. If a spill were to occur at the tank located above the Washington Hall generator building, the spill would most likely be contained within the concrete enclosure, but could possibly flow through cracks in the enclosure to the concrete area surrounding the tank, or to the generator room below the tank. If a spill were to occur at the tank within the generator units at Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Business School, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, or the Wheatley Center, the spill would most likely be contained within the unit, but could possibly flow to the surrounding grassy area.



TYPE OF MATERIAL PRESENT:

- Diesel Fuel

When you discover a spill, determine whether the spill is small or large and whether you can respond to it.

A SMALL SPILL IS WHEN....	A LARGE SPILL IS WHEN....
<p>Personnel can respond to with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The OSC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained and should not clean up large spills.</p>

Paints and Solvents

(Copy maintained at the Facilities Service Center)

CONTAINMENT: The storage areas for paints and solvents are located inside the Facilities Service Center and inside the Athletic Pavilion.

DRAINAGE: If a spill or release was to occur, it would be contained inside the buildings. No drains are located near the stored paint areas.

TYPE OF MATERIAL PRESENT:

- Paints
- Solvents

When you discover a spill, determine whether the spill is small or large and whether you can respond to it.

A SMALL SPILL IS WHEN....	A LARGE SPILL IS WHEN....
<p>Personnel can respond to with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The OSC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained and should not clean up large spills.</p>

Transformers (Pad & Pole-Mounted)

(Copy maintained at Facilities Service Center)

CONTAINMENT: The transformers are owned and maintained by Duquesne Light Co.

DRAINAGE: If a spill or release was to occur, a spill would flow to the surrounding concrete, asphalt, or grassy area surrounding the transformers; depending on the location (refer to Figure 2 – Facility Layout and Surface Drainage Map for specific location of drainage for each transformer).

TYPE OF MATERIAL PRESENT:

- Transformer Oil (Non-PCB)

When you discover a spill, determine whether the spill is small or large and whether you can respond to it. Immediately notify Duquesne Light Co. at 1-888-393-7000.

A SMALL SPILL IS WHEN....	A LARGE SPILL IS WHEN....
<p>Personnel can respond to with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The OSC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained and should not clean up large spills.</p>

Hydraulic Fluid for Elevators

(Copy maintained at Facilities Service Center)

CONTAINMENT: The hydraulic fluid is stored inside elevator workings in each elevator shaft throughout the campus.

DRAINAGE: If a spill or release was to occur, a spill would be contained inside each elevator shaft in the surrounding concrete area.

TYPE OF MATERIAL PRESENT:

- Hydraulic Fluid

When you discover a spill, determine whether the spill is small or large and whether you can respond to it.

A SMALL SPILL IS WHEN....	A LARGE SPILL IS WHEN....
<p>Personnel can respond to with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The OSC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained and should not clean up large spills.</p>

5.0 COUNTERMEASURES

5.1 Countermeasures Undertaken by the Site

- In the event of a spill or major leak of an environmentally sensitive material, the first priority is to attempt to stop the cause of the spill/release. This must be performed using the proper precautions and appropriate personal protective equipment. If the material is unknown, attempt to identify the material by labels, placards, other markings, etc.
- Once the material is identified, appropriate measures must be implemented (with proper protection for workers) to stop the spread of the spill and to prevent it from entering any drains or waterways. Use spill kits (pads, socks, pillows, blankets, and loose absorbent) to control smaller spills. Place absorbent materials in a fashion that will prevent the material from migrating any further. In the event of a large spill, use of equipment, shovels, and other appropriate tools to move sand or other material to construct a dike/containment structure will help to collect the material and prevent further spread or flow into any drainage system.
- If a material spills near a drain/inlet, use drain stopper mats to prevent the material from entering the drain/inlet.
- If material gets into a waterway, prevent the material from getting further downstream by placing booms across the entire width of the waterway (at a point downstream from the spilled material), preferably at a narrow point. Use absorbent pads to absorb material that may be floating on the surface of the water.
- If material spills in an area with secondary containment, ensure valves are closed on the containment structure and collect spilled material with absorbents. Once the material has been absorbed, collect used absorbents (pads, pillows, socks, blanket, etc.) and place in an empty, approved, 3-ringed, 55 gallon drum for appropriate waste inventory and proper disposal.
- After a spill has been contained and the immediate emergency has been brought under control, cleanup of the spill material should be initiated. Use appropriate equipment, as necessary, to complete cleanup. If material has spilled on soil, remove any stained soil. Use of proper personal protective equipment, such as protective suits, gloves, safety glasses, coveralls, etc., must be worn to protect the employee. After cleanup, decontamination of equipment must be completed. Spill kits and absorbent materials must be restocked.

5.2 Emergency Response Contractor(s)

In the event of a spill/release that poses a threat to humans and/or the environment, the first emergency response contractor that should be contacted is Moon Township, by dialing 911. The contractor for inventory, collection, removal and proper disposal of the various wastes internally contained on the site, such as used oil, is identified below:

- | | |
|---|--|
| 1. Safety-Kleen
West Mifflin Branch
650 Noble Drive
West Mifflin, PA 15122
Phone Number: 412-462-0644
Fax Number: 412-462-4734 | 2. ECS&R
3237 US Highway 19
Cochranton, PA 16314
Phone Number: 814-425-7773
Fax Number: 814-425-3201 |
|---|--|

In the event that RMU personnel cannot resolve an emergency situation, the local emergency response team may be contacted by dialing 911. This is done at the discretion of the Emergency Coordinator.

5.3 Internal and External Communication and Alarm Systems

External and internal communications equipment made available for staff and students on campus include land line phones, cellular phones, STD phones, two-way radios, and e-mail. Buildings are equipped with fire alarm systems and duress alarms are located throughout campus.

5.4 Evacuation Plan for Site Personnel

An audible alarm, such as a fire alarm or verbal communication, will be sounded in the event of an emergency requiring evacuation of the building. Portable fire extinguishers are located throughout the building. Diagrams of evacuation plans will be posted at every entrance/exit in the site.

The Public Safety Department ensures that order is maintained during evacuations. Horizontal and/or vertical evacuation procedures will be followed as necessary in the event of an evacuation. Office personnel shall exit through the closest doors (if possible) or other appropriate exit and proceed to designated safe area. After the building evacuation is completed, the Public Safety Department will give employees permission to return to their respective work areas.

5.5 Emergency Response Equipment

The facility may have spill response equipment available to allow site personnel to respond safely and quickly to emergency situations. Some examples of spill response equipment are portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas, or dry chemicals), spill control equipment, decontamination equipment, and emergency tool and patching kits.

Spill response equipment and supplies are maintained for immediate use inside the Maintenance Facility.

All equipment is maintained as necessary to assure its proper operation in time of emergency. After an emergency, all equipment must be decontaminated, cleaned, and fit for its intended use before normal operations resume. Spill kits are to be restocked.

Reusable equipment used in an emergency will be decontaminated thoroughly on-site and placed back into service. Emergency equipment is periodically checked to ensure it is in operating condition is in place. Spill kits are periodically restocked and absorbent materials are available at all times. Facility personnel will be appointed by the OSC to regularly inspect and maintain the emergency equipment using **Table 4** and this person(s) will be required to date and sign this table each time the emergency response equipment and supplies are inspected.

Examples of spill response equipment and supplies that should be available to personnel at the site are listed in **Table 4 – Emergency Response Equipment and Supplies**.

TABLE 4 - EMERGENCY RESPONSE EQUIPMENT AND SUPPLIES

<i>Emergency Equipment</i>	<i>Equipment Storage Locations</i>
Spill Kit (absorbent material)	Laboratories and Facilities Service Center/Areas
Fire Extinguishers	In All Buildings
First Aid Kit	Laboratories and Facilities Service Center
Eye Wash Stations	Science Labs
Communication Equipment	Throughout Campus
Two-way Radios	Facilities Service Center
Hand Tools (Shovels, etc.)	Garage and Sheds
Emergency Generator	Throughout Campus
Air Compressor	Facilities Service Center
Chain Saw	Facilities Service Center
Chemical Neutralizers	Laboratories
Decontamination Equipment	Facilities Service Center
Portable Lighting	Facilities Service Center

5.6 Emergency Assistance, Response, and Reporting

The specific reporting time periods and the information required to be communicated when reporting a spill is contained within this section. In addition, this section contains steps to follow for written notice requirements to the PADEP and the Moon Township Municipal Authority.

Refer to Section 2.2 for emergency assistance contacts you may use in the event of an emergency. The OSC should familiarize themselves with **Table 1 – List of Emergency Contacts**, and the regulatory response requirements that are spelled out in this section.

5.6.1 Response and Reporting

During an emergency, the OSC must take all reasonable measures necessary to ensure that fire, explosion, emission, or discharge do not occur, reoccur, or spread to other materials or wastes at the facility. These measures shall include where applicable, stopping manufacturing processes and operations, collecting and containing released materials or wastes, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, emission, or discharge, the EC must ensure that adequate monitoring is conducted for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after a reportable spill/release, the EC, with the PADEP approval, must provide for treating, storing, or disposing of residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the facility.

The Emergency Coordinator must insure that in the affected areas of the facility, no material or waste incompatible with the emitted or discharged residues is processed, stored, treated, or disposed of until cleanup procedures are completed; and, all emergency equipment listed in the plan is cleaned and fit for its intended use before operations are resumed.

The Emergency Coordinator will within 15 days after a reportable incident, submit a written report on the incident to the PADEP. The report must include the following:

1. Name, address, and telephone number of the individual filing the report;
2. Name, address, and telephone number of the facility;
3. Date, time, and location of the incident;
4. A brief description of the circumstances causing the incident;
5. Description and estimated quantity by weight or volume of materials or wastes involved;
6. An assessment of any contamination of land, water, or air that has occurred due to the incident;
7. Estimated quantity and disposition of recovered materials or wastes that resulted from the incident; and

8. A description of what actions the installation intends to take to prevent a similar occurrence in the future.

5.7 Downstream Notification Requirements for ASTs

The downstream notification requirement is not applicable for this facility since aggregate above ground storage tank capacity of regulated substances does not exceed 21,000 gallons.

6.0 SITE INSPECTION AND OPERATIONAL PROCEDURES

This section contains information on inspecting systems in areas identified as potential spill areas and corresponding standard operating procedures (SOPs) for inspecting these systems.

6.1 Site Inspection and Monitoring Program [40 CFR 112.7(e)]

By focusing on site security and early detection of system failures, the inspection program detects and prevents system malfunctions, equipment deterioration, and operator errors. Inspections must occur frequently enough to alert site personnel before a serious problem develops. Engineering knowledge and operational experience with the systems and processes involved determine the exact inspection schedule.

General inspections of the tanks include monthly visual inspections for leaks and corrosion during the monthly emergency generator operational testing conducted by the approved RMU contractor. Paint storage areas are visually inspected on a regular basis for leakage.

6.2 Bulk Storage Tank Testing and Inspections

The facility has eleven aboveground storage tanks used to store diesel fuel to fuel the emergency generators associated with Washington Hall, Lafayette Center, Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Business School, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, and Wheatley Center. In addition to the regular visual inspection during the emergency generator testing, the tanks will be serviced as needed when the visual inspections reveal repairs are needed. The servicing of the tanks will be done by an outside contractor and will include integrity testing when material repairs are made. All testing will be completed according to the tank manufacturing specifications, and in accordance with industry standards and good engineering practices.

6.3 Site Operational Procedures for Preventing Spills (SOPs) [40 CFR 112.7(e)]

6.3.1 Preventing Site Spills SOP

These basic guidelines will be followed to prevent a release from occurring on-site:

Store Chemicals Properly

- Properly store chemicals in their appropriate containers.
- Keep containers of incompatible materials separate and orderly.
- Keep hazardous materials and hazardous waste accumulation areas clean and orderly and a safe distance from areas where there is common interaction with the general public.
- Post warning signs that are visible from 50 feet.

Use Secondary Containment

- Place drip pans and absorbent pads under leaking vehicles and fueling nozzles.
- Ensure ASTs have secondary containment.

Use Spill Kits

- Maintain enough sorbent, equipment, and prevention tools for small spills.
- Maintain an MSDS for each hazardous material and keep the Combined Plan available.

6.4 Additional Regulatory Requirements [40 CFR 112.7 and 8]

The following regulatory requirements supplement the procedures and protocols detailed in this plan:

40 CFR 112.7 (c) - Appropriate containment and/or diversionary structures or equipment is provided to prevent a discharge. The entire containment system, including walls and floor, is capable of containing chemicals and are constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. This secondary containment is achieved by the use of dikes, berms, or retaining walls sufficiently impervious to contain chemicals and curbing.

40 CFR 112.7(i) – Appropriate action will be taken as necessary if a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe.

7.0 PLAN MANAGEMENT

7.1 Professional Engineers Certification

A Registered Professional Engineer will review and certify the Combined Plan at least every five years or as technical amendments are developed in accordance with 40 CFR 112.3(d). The *Professional Engineers Certification Form* is found on the certification page in the front of this plan (PE Certification Statement). This page includes the signature of the certifying Professional Engineer that has examined the Combined Facility Response Plan and certifies the Combined Facility Response Plan has been prepared in accordance with good engineering practices.

7.2 Combined Facility Response Plan Review and Revisions (40 CFR 112.5)

The University will periodically review and evaluate this Combined Plan for any changes in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil or material discharge. The University will review and certify this Combined Plan at least annually with reviews documented in the Plan Review Page (page v) and Record of Change Form (Appendix B).

7.3 Environmental Consultant and Emergency Coordinator Review

Technical amendments made to the Plan will be reviewed by a professional environmental consultant. The designated consultant will conduct an investigation of the site and will compare the results of the investigation to the data that was included in the initial Combined Facility Response Plan development. A Professional Engineer must certify each technical amendment made to this Plan. A *Record of Change* will be included as an attachment to the revised Combined Facility Response Plan (Appendix B).

The Combined Facility Response Plan will be amended whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil into or upon navigable waters of the United States or adjoining shorelines.

Other circumstances that may warrant a review and update of the Combined Facility Response Plan include the following:

- Any significant changes to Federal and state regulations that could affect the Combined Facility Response Plan;
- If requested by the USEPA, PADEP, and any local municipal authorities;
- If there is a change in the personnel responsible for managing the plan;
- If there are changes to emergency contact's information
- If there are any changes to adjacent features that could impact navigable waterways that are shared by the main campus of RMU;
- The addition of any adjacent commercial and industrial facilities that may impact the site and navigable waterways the various site may share;
- Additions or deletion of any outside contractor who is targeted to respond to any large on-site spill emergencies and subsequent site cleanups; and/or

- In an event, the Combined Facility Response Plan proves to be ineffective in preventing, containing, cleaning up a spill response situation; and
- If effective prevention and control technology will significantly reduce the likelihood of a spill event.

7.4 Record of Change Form to Combined Plan

A blank *Record of Change Form* is included in **Appendix B**. In the event that there are any changes to be made to the Combined Facility Response Plan, a *Record of Change Form* should be filled out and included as an attachment to the Combined Facility Response Plan.

7.5 Implementation Schedule for Plan Elements

Table 5
Implementation Schedule – Plan Development

Project	Proposed Implementation Date
Require secondary containment/spill prevention during refueling operations	August 2013
When replacing elevators/elevator equipment, require double walled oil reservoirs tanks, or other acceptable type of containment system	As elevator upgrades are scheduled

8.0 SUMMARY OF PLAN COMPLIANCE WITH EPA REGULATIONS

This section contains information regarding RMU compliance with various USEPA regulations regarding site spill prevention programs.

8.1 Combined Plan Review

8.1.1 On-Shore Facilities – 112.7[c][1]

Where required, localized secondary containment must be provided for all site ASTs installed after 1997, refuelers, and other designated storage containers located at the facility.

8.1.2 Off-Shore Facilities – 112.7[c][2]

No off-shore facilities are located at the site.

8.2 Site Spill Contingency Plan – [40 CFR 112.7(d)]

Section 4.0 contains detailed spill response procedures. The facility has dedicated manpower that has been trained in the prevention and response of spills. These identified personnel will participate in training programs that will keep them current with specific Federal, state, and local legislation regarding spill prevention, control, and response for activities conducted at the site. Several outside sources (e.g., local fire company and borough police department) have also been identified to assist in spill response if needed. These outside sources are aware of site activities and storage of oils and other chemicals through the sites' Community Right-to-Know Plan.

8.3 Engineering Design and Operating Practices to Prevent Site Spills

This section identifies various engineering controls and operating procedures incorporated to prevent spills.

8.3.1 Bulk Storage Tanks – [40 CFR 112.8(c)]

The main campus of RMU has 11 ASTs as detailed in **Table 2 – Material and Waste Inventory**.

Compatibility of Tanks and Product Stored – 112.8[c][1]

The construction of the ASTs has been designed to be compatible with its contents. The tanks have also been designed with thermal and corrosion protection.

Secondary Containment – 112.8[c][2]

All ASTs on site are single-walled or enclosed within a generator unit.

Buried Metallic Storage Tanks – 112.8[c][4]

The site does not contain any buried metallic tanks.

Partially Buried Metallic Storage Tanks – 112.8[c][5]

The site does not contain any partially buried metallic tanks.

Periodic Integrity Testing for ASTs – 112.8[c][6]

All ASTs will be visually inspected weekly and following any material repairs for signs of deterioration, discharges, or accumulation of material inside diked areas.

Internal Heating Coils – 112.8[c][7]

None of the site ASTs contains internal heating coils.

Fail-Safe Engineering on ASTs – 112.8[c][8]

All regulated ASTs, include fail-safe engineering controls such as high liquid level alarms or high liquid level pump cutoff devices, audible/code warning, and regular testing of liquid level sensors.

Water Discharge Facilities – 112.8[c][3]

The site does not anticipate the need to discharge to any navigable waterways. If the need arises in the future, a NPDES permit will be applied for from the Commonwealth of Pennsylvania.

Correction of Any Tank Deficiencies – 112.8[c][10]

If the integrity of the tanks is in jeopardy (e.g., visible leaks of tanks and piping), the necessary steps will be taken to correct the problem. This would include removing the tank from the service, evaluating the problem, and following the necessary protocol to repair and fix the problem.

8.3.2 Hazardous Materials Storage Containers

The site does not store hazardous waste or regulated materials on-site in bulk. Any waste items that constitute a hazardous waste are removed off-site within the required time frame after generation.

8.3.3 Buried Piping Protected Against Corrosion – 112.8[d][1]

Buried piping associated with bulk storage tanks is not used at the site.

Out-of-Service Pipes Capped – 112.8[d][2]

The site OSC will mark the origin of the piping in the event of any piping being capped and removed from service.

Pipe Supports Design – 112.8[d][3]

All pipe supports have been designed to limit possible abrasions, corrosion and sagging. The inspection of all pipe supports will be included as part of the inspection of the ASTs.

Inspection of Aboveground Piping and Valves – 112.8[d][4]

Site inspection personnel will conduct regular inspection of all surface piping and drainage valves.

Signs To Warn Vehicles About Piping – 112.8[d][5]

The piping associated with the ASTs is not in a vehicular traffic area.

8.3.4 AST Refueling Areas – [40 CFR 112.7(h)]

Fueling Procedures

Fuelers will follow DOT procedures for loading/unloading tank trucks.

Secondary Containment for Refueling Operations – 112.7[h][1]

Some form of temporary secondary containment will be provided for the largest vehicle compartment refueler that enters the site for refueling purposes.

Disconnect Warning Signs – 112.7[h][2]

Early vehicle departure is prevented via warning signs.

Inspection of Fuel Truck Prior to Departure – 112.7[h][3]

The refueling drivers with oversight from site personnel inspecting refueling operations will ensure all refueling vehicles are examined for leakage at all outlets prior to departure.

8.3.5 Site Inspections and Site Records of Potential Spill Areas – [40 CFR 112.7(e)]

The site has instituted a procedural inspection program for all potential spill areas. The site will maintain written records of all inspections of potential spill areas for three years. Records are located in the Emergency Coordinators office. For protocol to follow regarding inspections of potential spill areas please refer to Section 6.0 – Site Inspection and Operational Procedures.

8.3.6 Site Security – [40 CFR 112.7(g)]

Section 1.2 – Site Description and Background Information contains detailed information regarding site security.

Fencing – 112.7[g][1]

The campus and tank areas are not entirely surrounded by fencing; however, vandals are deterred by public safety surveillance.

AST Master Flow Valves – 112.7[g][2]

Site personnel ensure that master flow and drain valves of ASTs are locked during the sites non-operative hours.

Starter Controls – 112.7[g][3]

Site personnel will ensure that the pump starter controls are locked in the “off” position or located where only authorized personnel have access.

Connections to Pipelines – 112.7[g][4]

All out-of-service pipelines will be capped or blank-flanged.

Lighting for All AST Areas – 112.7[g][5]

The site maintains adequate lighting for detecting spills at night and to deter vandals.

8.3.7 Personnel Training and Spill Prevention Procedures – [40 CFR 112.7(f)]

Personnel Training – 112.7[f][1]

All site personnel who manage or handle oil or hazardous materials will be instructed in equipment operation, hazardous waste and oil regulations. Refer to Section 2.0 – Description of Plan Implementation for additional information on responsibilities and training of personnel.

Responsibilities – 112.7[f][2]

The Emergency Coordinator is responsible for conducting and documenting personnel training of spill prevention procedures. Refer to Section 2.0 – Description of Plan Implementation for additional information on responsibilities of personnel.

Spill Plan Training – 112.7[f][3]

The Emergency Coordinator is responsible for conducting and documenting personnel training on the contents, location, and access to this Combined Plan. Refer to Section 2.0 – Description of Plan Implementation for additional information on training of personnel.

APPENDIX A

MATERIAL SAFETY DATA SHEETS

**(MSDS ARE MAINTAINED BY DEPARTMENTS & FACILITIES
MANAGEMENT SAFETY AT ROBERT MORRIS WEBSITE
([HTTP://RMU.EDU/SAFETY](http://rmu.edu/safety))**

APPENDIX B

RECORD OF CHANGE FORM TO THE COMBINED FACILITY RESPONSE PLAN

RECORD OF CHANGE FORM TO THE COMBINED FACILITY RESPONSE PLAN

[illegible]

APPENDIX C

MINOR SPILL/OIL SPILL REPORT

MINOR SPILL/OIL SPILL REPORT

Date of Report		
Report Completed by		(Contact Phone Number)
Person Reporting Spill		(Contact Phone Number)
Date of Spill		
Time of Spill	(am or pm)	
Time Spill Was Reported	(am or pm)	
SPILLED MATERIAL:		
Specific Location of Spill		
Type(s) of Oil/Material Spilled	(Attach MSDS(s) to Report)	
Total Quantity Spilled	(gal or lb)	
Spill Inside Containment	YES	NO
Reportable Quantity (?)	YES	NO (If YES, Notify Appropriate Agencies)
Media Impacted	Soil	Asphalt
Source of Oil/Material Spilled		
Cause of Spill		
LIST OF PERSONS RESPONDING TO SPILL:		
On-Site Personnel / Name	Phone Number	Date / Time
Contractors / Name		
NOTIFICATIONS PERFORMED:		
Agency	Contact Name / Phone Number	Date / Time
Local Police / Fire		
POTW		
National Response Center		
PADEP (Southeast Regional Office)		
U.S. EPA (Region III)		
Emergency Management Agency		
PA Fish and Boat Commission		
PA State Police		
Hospital		