



COMMUNITY COLLEGE

OF RHODE ISLAND

**OIL SPILL PREVENTION CONTROL AND
COUNTERMEASURES (SPCC) PLAN**

For:

Community College of Rhode Island
Flanagan Campus
1762 Old Louisquisset Pike
Lincoln, RI 02865

Prepared by:

Triumvirate Environmental, Inc.
200 Inner Belt Road
Somerville, MA 02143

November 2020
Updated July 2021



PROVIDING LONG-TERM, INNOVATIVE SOLUTIONS

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION AND PLAN CERTIFICATION.....	3
1.1 Introduction.....	3
1.2 Facility Processes.....	3
1.3 Site Description.....	3
1.4 Scope of Plan	4
1.5 Self Certification.....	5
2.0 PLAN REVIEW AND AMENDMENTS (§112.4, 112.5(A)(B)(C)).....	6
2.1 Oil SPCC Plan Amendments Required by the U.S. EPA.....	6
2.2 Oil SPCC Plan Amendments Required in the Event of a Material Change	6
2.3 Oil SPCC Plan Review & Evaluation.....	7
2.4 Conformance with Regulatory Requirements (§112.7(a)(1)).....	8
2.5 Management Approval.....	8
3.0 GENERAL SITE INFORMATION (§112.7(A) (3)).....	9
4.0 SPCC PLAN OVERVIEW (§112.7(A)(3))	9
4.1 Facility Description.....	9
4.2 Oil Storage	9
5.0 DESCRIPTION OF PETROLEUM MANAGEMENT AREAS	10
5.1 Aboveground Storage Tanks (ASTs).....	10
5.2 Underground Storage Tanks (USTs)	11
5.3 55-Gallon Drums	11
5.4 Transformers	11
5.5 Hydraulic Elevators	11
5.6 Miscellaneous Oil Storage	12
5.7 Potential Oil Discharges - General	12
6.0 COMMUNITY COLLEGE OF RHODE ISLAND POLICIES ON OIL STORAGE, SPILL PREVENTION, AND SPILL CONTAINMENT (§112.7(A)(3)(I-V)).....	12
6.1 Materials of Construction	13
6.2 Piping Systems.....	13
7.0 POTENTIAL SPILLS - PREDICTION AND CONTROL (§ 112.7(B) & (C))	13
8.0 FACILITY DRAINAGE (§ 112.8(B)).....	13
9.0 BULK STORAGE TANKS/CONTAINERS (§ 112.8(C)).....	14
9.1 Tank Materials and Construction (§ 112.8(c)(1)).....	14
9.2 Secondary Containment (§ 112.8(c)(2))	14
9.3 Buried or Partially Buried Metallic Tanks (§112.8(c)(4)&(5))	14
9.4 Aboveground Storage Tank Integrity Testing (§112.8(c)(6)).....	14
9.5 Underground Storage Tank Integrity Testing.....	15
9.6 Tank/Container Installations – Good Engineering Practices (§112.8(c)(8)) ..	15

9.7 Facility Wastewater Discharges (§ 112.8(c) (9)).....	16
9.8 Visible Oil Leaks and Mobile Oil Storage Tanks (§112.8(c) (10) & (11))	16
10.0 TRANSFER OPERATIONS, PUMPING AND IN-PLANT PROCESSES (§112.8(D))17	
10.1 Buried Piping (§ 112.8(d)(1))	17
10.2 Out-of-Service Pipelines (§112.8(d)(2) & 112.7(g)(4))	17
10.3 Pipe Supports and Aboveground Pipelines and Valves (§112.8(d)(3) and (4))	17
11.0 FUEL DELIVERY OPERATIONS (§112.8(D)).....	18
11.1 Department of Transportation Regulations.....	18
11.2 Fuel Oil Delivery Procedures.....	18
12.0 INSPECTIONS AND RECORDS (§112.7(E))	19
12.1 Inspection Program and Testing	19
12.2 Integrity Testing (§112.8(c)(6))	20
12.3 Recordkeeping Procedure	21
13.0 SECURITY (§112.7(G)).....	22
13.1 Fencing and Gates (§112.7(g)(1)).....	22
13.2 Flow Valves, Starter Controls, and Pipeline Loading/Unloading Connections (§112.7(g)(2)&(3)(4))	22
13.3 Facility Lighting (§112.7(g)(5)).....	23
14.0 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES (§112.7(F)) 23	
14.1 Training.....	23
15.0 SPILL RESPONSE/NOTIFICATION PROCEDURES (§112.7(A)(4)).....	24
15.1 General	24
15.2 Spill Response Procedures	24
15.3 Spill Response Equipment	26
15.4 Spill Reporting Requirements.....	26
15.5 Rhode Island DEM Release Reporting Requirements (Section 46-12.7).....	27
15.6 Contact List (§112.7(a)(3)(vi))	28
15.7 Reporting Requirements: U.S. EPA -Significant or Multiple Releases to Surface Water (§112.4).....	29
16.0 SUBSTANTIAL HARM CRITERIA EVALUATION (§112.20)	30
APPENDIX 1 – FACILITY SITE PLAN AND OIL STORAGE LOCATION MAP.....	31
Facility Map	31
Basement Floor Plan	32
1 st Floor Plan.....	33
APPENDIX 2 – OIL STORAGE MANAGEMENT AREAS.....	34
APPENDIX 3 – OIL STORAGE AREAS MONTHLY INSPECTION CHECKLIST	36

1.0 INTRODUCTION AND PLAN CERTIFICATION

1.1 Introduction

The Community College of Rhode Island (CCRI) is a multi-campus community college with locations throughout the state of Rhode Island. This Spill Prevention Control and Countermeasures Plan (SPCC) has been developed specifically for the Flanagan Campus located in Lincoln, Rhode Island to be used in response to spills or releases of oil or petroleum products at the site. The Plan may also be used to respond to releases of other substances. This SPCC Plan has been prepared in accordance with and conforms to 40 CFR Part 112, the Federal Oil Pollution Prevention Regulation and the Rhode Island Department of Environmental Management's (RIDEM) Oil Pollution Control Regulations. A complete copy of this Plan is maintained on site and is available for on-site review during normal working hours.

1.2 Facility Processes

The State of Rhode Island Board of Governors owns the Community College of Rhode Island. CCRI is an educational institution whose facilities are used at times by other agencies and groups for various functions and activities.

At CCRI, oils and fuel oils are used for a variety of power and maintenance purposes. This Spill Prevention, Control, and Countermeasure (SPCC) Plan contains information pertaining to prevention of spills, containment of spills, clean-up measures, and reporting procedures for CCRI.

CCRI is committed to the prevention of discharges of oil to navigable waters and the environment and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this SPCC plan.

This SPCC Plan includes the oil storage locations that are listed in Appendix 2 and are described in detail in Section 5.0. **Appendix 1** provides a site plan depicting CCRI property and associated areas that are covered by this SPCC Plan.

This Plan will be reviewed at least once every five years. In addition, this plan will be updated whenever there is a change in the facility design, construction, operation, or maintenance that affects the facility's potential to discharge oil.

1.3 Site Description

Community College of Rhode Island is an educational institution with four campuses across the state of Rhode Island. The Flanagan Campus covers approximately 300 acres with 4 buildings. These consist of the main building, field house, maintenance garage, and motorcycle shed.

On-site storage for oil includes aboveground storage tanks containing diesel fuel, transformers containing oil, elevators with hydraulic oil, and 55 gallon drums for various stock and waste oils. Storage areas are shown in **Appendix 1 & 2** and described in Section 5.0 of this plan.

1.4 Scope of Plan

The facility is subject to the requirements of 40 CFR Section 112, the Federal Oil Pollution Prevention Regulations, since the quantity of aboveground petroleum stored or used at the facility exceeds 1,320 gallons. The plan addresses devices and practices relevant to the prevention and control of petroleum spills. The physical arrangement, design, and location of oil handling and storage areas at the facility are described in this Plan. Operational procedures for the transfer and use of petroleum products are included. Also described in this Plan are the emergency response procedures and petroleum spill clean-up and reporting procedures that will be implemented in the event of a petroleum release. An outline of the required SPCC review and amendment process is included. Personnel training, inspection and record keeping policies are also detailed in this Plan. Community College of Rhode Island is subject to these regulations based upon the quantities of oils stored at their facility.

The CCRI Flanagan campus in Lincoln stores 3,960 gallons of oil in containers or aboveground storage tanks (ASTs) in various locations throughout the facility. This Oil Spill Prevention, Control & Countermeasure (SPCC) Plan has been developed in accordance with the requirements of 40 CFR Part 112 as found in Sec. 22a-450.

1.5 Self Certification

CCRI has less than 10,000 gallons in aggregate aboveground oil storage capacity. Additionally, the CCRI Flanagan campus has not had a single discharge of oil to navigable waters exceeding 1,000 U.S. gallons, nor two discharges of oil to navigable waters each exceeding 42 U.S. gallons within any twelve-month period, for the three years prior to the SPCC Plan certification date. CCRI has therefore chosen to self-certify this plan rather than having the plan reviewed and certified by a licensed professional engineer.

Owner/Operator Certification

I attest that I am familiar with the requirements of 40 CFR part 112 and have visited and examined the campus, and that:

- The Plan has been prepared in accordance with accepted and sound industry practices and standards and with the rule requirements; Procedures for required inspections and testing have been established; The Plan is being fully implemented;
- The campus meets the qualifying criteria for self-certification;
- The Plan does not deviate from rule requirements except as allowed and as certified by a PE; and
- CCRI management approves the Plan and has committed resources to implement it.

Name: _____

Title: _____

Signature: _____

Date: _____

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

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

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

- 1) The facility has a discharge exceeding 1,000 gallons of oil in a single discharge, or
- 2) If more than 42 gallons of oil are discharged in each of two discharges occurring within any 12-month period.

If either of these two events occurs, Community College of Rhode Island will submit information specified in the regulation to the RA within 60 days.

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

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

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

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

2.3 Oil SPCC Plan Review & Evaluation

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

The amendment will be implemented as soon as possible, but no later than six months following the amendment of the plan. The review and evaluation of the Oil SPCC Plan must be documented and a statement signed as to whether the plan will or will not be amended, as follows:

“I have completed review and evaluation of the Oil SPCC Plan for Community College of Rhode Island on the date(s) below, and will (will not) amend the plan as a result”

Review Dates

Amendment

Signature

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

2.4 Conformance with Regulatory Requirements (§112.7(a)(1))

Community College of Rhode Island has developed this Oil SPCC Plan in accordance with the requirements of 40 CFR Part 112 and the state of Rhode Island Department of Environmental Management (RIDEM) Division of Groundwater and Freshwater Wetlands Oil Pollution Control Regulations. As allowed by this regulation (112.7(a)(2)), alternative equivalent environmental protection provisions have been implemented where deviation from technical elements of the regulation have been necessary. The reason for each deviation and a description of the environmentally equivalent methods implemented are included within this plan.

2.5 Management Approval

Community College of Rhode Island is committed to the prevention of discharges of oil to navigable waters and the environment and maintains the industry standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasures Plan. Community College of Rhode Island is prepared to commit appropriate resources and manpower to respond to spills in accordance with this plan.

Authorized Facility Representative:

David A. Snow

Name

Signature

Interim Director of Physical Plant

Title

Date

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

Name of Facility: Community College of Rhode Island – Flanagan Campus
Type of Facility: College
Location of Facility: Lincoln, Rhode Island

Name and address of owner or operator:

Community College of Rhode Island
1762 Old Louisquisset Pike
Lincoln, RI 02865

State of Rhode Island Board of Governors
301 Promenade Street
Providence, RI 02809

Designated person(s) accountable for oil spill prevention at the facility:

Name	Office Phone	24-Hour Phone	Email
David A. Snow	401-825-2111	401-290-7854	dasnow@ccri.edu
Walter Ducharme	401-333-7041	401-255-1018	wducharme@ccri.edu
Jeff Aptt	401-333-7047	401-742-7816	japtt@ccri.edu

4.0 SPCC PLAN OVERVIEW (§112.7(a)(3))

4.1 Facility Description

This SPCC plan is applicable to the Community College of Rhode Island Flanagan campus, and its associated parking lots and facilities and grounds buildings. The CCRI campus is comprised of four buildings with various purposes including laboratories, facility and maintenance buildings, dining halls, sports complex, and classrooms.

A facility site map/plan is located in **Appendix 1**.

4.2 Oil Storage

Oil storage units are located inside and outside of various buildings located throughout the campus. The maps/plans presented in **Appendix 1** identifies the location of these oil units on campus. The stored oil applicable to this plan is used for a variety of applications, including:

- Diesel fuel for emergency generators
- Waste grease from the kitchen fryers
- Hydraulic oils for elevators
- Lube oil, hydraulic oil, motor oil, and waste oil containers
- Transformer oil

Types of Oils Stored and Storage Volume

Appendix 2 identifies the types of oils used at Community College of Rhode Island Flanagan Campus and their approximate total capacity volumes. Aboveground storage totals include all oil types and sizes of tanks and containers with a capacity of 55 gallons or greater.

Oil storage locations referenced in **Appendix 2** are shown on the maps/plans in **Appendix 1**. The predicted flow rate and direction of any releases from oil storage units located outdoors are indicated in **Appendix 2**.

5.0 DESCRIPTION OF PETROLEUM MANAGEMENT AREAS

The college maintains a variety of petroleum products in aboveground storage tanks, drums, transformers, hydraulic elevators, and containers throughout the campus. **Appendix 2** provides a description of bulk storage tank locations, capacities, means of secondary containment, total oil quantity stored and potential release direction and rate of flow. Community College of Rhode Island: (1) provides secondary containment structures for many of the bulk oil storage tanks and drums; (2) complies with federal and state regulations for the handling and storage of petroleum; (3) performs regular preventative maintenance and inspection of all oil storage facilities; and (4) employs Best Management Practices to avoid minor spills during routine inspections so the likelihood of a release to land or water is low. The aggregate capacity of the aboveground storage containers and tanks at this site is greater than 1,320 gallons.

5.1 Aboveground Storage Tanks (ASTs)

Description of Facilities

There are 4 emergency generators on the CCRI Lincoln campus. The generators serves as back-up electrical power for the main building, field house, and lift station. Each generator has a fuel tank incorporated into the unit. The fuel tanks are double-wall steel tanks which contain diesel fuel in amounts ranging from 150 to 1,000 gallons each.

Handling Procedures

Delivery of fuel oil is by tank truck and the fill locations for the aboveground tanks are directly on the tanks. Community College of Rhode Island facilities personnel are present during filling operations of all aboveground storage tanks. As an additional precautionary measure, sorbents and other spill control equipment will be centrally stored on campus to allow for speedy response in the event of a spill or leak.

Assessment of Spill Potential

The potential of spills is during filling operations and from a tank rupture. Because most of the tanks are double-walled tanks the likelihood of a tank failure resulting in a release is fairly remote. In the event of a tank rupture the release would occur instantaneously for catastrophic tank failure or gradually in the event of a small leak in the tank. A spill during filling operations would most likely occur due to overfilling of the tank. In either scenario the spilled oil would run downgrade onto a cement pad then onto grass, soil or gravel surrounding the tank.

Information regarding these tanks is provided in **Appendix 2**. The tank locations are depicted on **Appendix 1**.

5.2 Underground Storage Tanks (USTs)

Currently there are no underground storage tanks at the CCRI Lincoln Campus.

5.3 55-Gallon Drums

Grounds Department Maintenance Garage

In the maintenance garage area there is one 55-gallon drum of motor oil. There is also a storage cage in the basement of Mod 3 containing three 55-gallon drums of various oils. Additionally, there are three 55-gallon drums of kitchen grease located at the kitchen loading dock. Spills resulting from any of these drums would be contained within the building and cleaned up immediately.

Information regarding these drums is provided in **Appendix 2**. The drum locations are depicted in **Appendix 1**.

5.4 Transformers

There are four oil-filled electrical transformers on the site. Three of these are located at the entrance of each Mod (1, 2, & 3). The fourth is located at the East Entrance of the Field House. All of the transformers are mounted on a cement pad and surrounded by soil. In the event of a release from one of the transformers the oil would be absorbed into the adjacent soil.

Information regarding these transformers is provided in **Appendix 2**. The locations are depicted in **Appendix 1**.

5.5 Hydraulic Elevators

There are three hydraulic elevators located in the Main Building on the CCRI Lincoln campus. The oil reserves for the elevators is approximately 80 gallons. The elevator has a hydraulic oil reservoir that is located in a locked mechanical room in an area adjacent to the elevator. Hydraulic oil storage tanks are of single wall steel construction with no additional spill containment. An outside contractor performs maintenance on the elevators and checks the hydraulic oil level as part of the regular service schedule. A spill or leak from the hydraulic oil storage tank would be contained first within the mechanical room where the tank is situated and then within the building itself. The floor in the mechanical room is poured cement with concrete curbing to contain any spilled oil. There are no sumps in the elevator pit.

Information regarding the elevator is provided in **Appendix 2**. The location is depicted in **Appendix 1**.

5.6 Miscellaneous Oil Storage

Cooking Oil

There are three 55-gallon drums of kitchen grease located at the kitchen loading dock. These drums are located on spill decks. In the event of a release, the oil would be contained within the building.

Information regarding the elevator is provided in **Appendix 2**. The location is depicted in **Appendix 1**.

5.7 Potential Oil Discharges - General

Oil discharges/spills could be caused by failure of a vessel, punctured piping system, corrosion, mechanical impact, or by accidental mishandling during transfer.

Appendix 2 lists the potential types of failures that could reasonably be expected to occur at the facility, including a description of the discharge scenario, the maximum discharge volume, and the approximate discharge rate. Each of the containers described in the tables is constructed of materials compatible with the product stored and conditions of storage.

In addition to the bulk storage areas, minimal quantities of oil may be kept at various locations throughout the facility (<55 gallons at each location). This includes oils used for maintenance of hydraulic equipment, motor oils, kitchen grease, waste oils, and other small quantities of oils which may be used at the facility. Also, lubricating and fuel oils are contained in motor vehicles which may be located in the parking areas adjacent to the facilities from time to time. Although these minimal quantities of petroleum are not required to be addressed, this Plan may be implemented to address a release of these small quantities.

6.0 Community College of Rhode Island Policies on Oil Storage, Spill Prevention, and Spill Containment (§112.7(a)(3)(i-v))

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

Spill prevention measures are primarily directed at maintaining and assuring the integrity of the tank walls, secondary containment systems, and preventing overfills. To accomplish these preventive measures, a formal tank/container inspection program has been prepared as described in **Section 12.0** of this plan.

6.1 Materials of Construction

Tanks and containers used for petroleum storage or transport are constructed of materials compatible with the petroleum with which they are in contact. For drums and tanks located within a building area, the size of the building dimensions will act as secondary containment in the event of a release.

6.2 Piping Systems

There is minimal piping at the CCRI Lincoln Campus. Aboveground oil piping located at each of the oil transfer and dispensing areas are subject to regular visual inspections for leaks and deterioration in accordance with **Section 12.0** of this plan. Associated appurtenances (i.e., valves, flanges) are also subject to regular inspections for leaks and deterioration as well. Any valves which are not self-closing will remain in the closed position when in non-operating or non-standby status.

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

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

Appendix 2 of the plan lists the locations where oil is stored and where spill events could occur, indicates stored oil volumes, predicts potential flow rates and flow directions, and discusses the containment and/or diversionary structures or equipment that are used to prevent discharged oil from reaching a surface water.

8.0 FACILITY DRAINAGE (§ 112.8(b))

The facility has oil storage tank bulk containers and/or delivery areas that are adjacent to, or within close proximity to storm drains. The tanks are inspected, and deliveries are monitored by CCRI personnel. Some tanks are not adjacent to storm drains. During periods of wet weather flow, there is a possibility that oil spills to storm drains could reach a local surface water body or navigable waterway and be considered a reportable spill incident by federal definition.

ASTs are located on concrete or asphalt surfaces. With the exception of the oil-filled electrical transformers, all other containers that have the total capacity equal to or greater than 55 gallons, are double-walled or have secondary containment.

The storm drains discharge to nearby bodies of water (i.e., Ponds, rivers, streams, etc.)

There are wetlands on the property. A rupture in the tanks and secondary containment areas on the site could potentially result in all the oil in a tank being released in a very short time. The

amount of oil that would be released would depend upon the type of release and could range from a small drip (from a leaky valve) to 1,000 gallons (due to catastrophic failure of the largest tank).

Simultaneous releases from all tanks is not a likely scenario. In addition, it is not likely that oil would reach the storm drains for two reasons. First, adequate secondary containment and other preventative measures have been taken or are planned to prevent such releases. Second, most of the tanks are either located inside the buildings at the campus or are located sufficient distances from the storm drains so that releases from the tanks would be absorbed by the soil between the tanks and the drain.

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

“Bulk storage container” is defined in the regulations as *any container used to store oil except oil filled electrical, operating, or manufacturing equipment*. For purposes of this plan, the term’s “tank” and “container” are used interchangeably. Oil storage tank inventories for the Community College of Rhode Island Lincoln Campus are provided in **Appendix 2**. There are aboveground storage tanks and containers at the facility. Absorbent materials are available to personnel responding to reports of leaks or releases.

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

Aboveground storage tanks are steel and other materials that are compatible with the material stored within them and with other conditions of storage.

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

Secondary containment is provided for most of the AST’s by means of the use of double-wall steel tanks or cement pads. In addition, the elevator mechanical room has a poured cement floor with curbing to prevent oil from exiting the immediate area. Drums have spill decks or other containment structures. There are no cases where implementing secondary containment methods around oil/diesel storage tanks have been determined to be impractical. Community College of Rhode Island’s fuel oil delivery contractor(s) perform fuel deliveries in compliance with U.S. Department of Transportation (DOT) unloading regulations.

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

There are no buried or partially buried metallic tanks at the CCRI Lincoln Campus.

9.4 Aboveground Storage Tank Integrity Testing (§112.8(c)(6))

Federal oil pollution prevention regulations set forth in 40 CFR Part 112 require integrity testing of aboveground oil storage tanks/containers on a regular schedule. In order to comply with this requirement Community College of Rhode Island complies with the provisions of the Steel Tank Institute Standard SP001 which is titled: “*Inspection of Aboveground Storage Tanks*”. This standard will here forth be referred to as STI Standard SP001. The standard establishes methods and procedures for the inspection of storage tanks based on the risk to the environment that those tanks pose with consideration to the release detection and containment engineering.

55-Gallon Drums

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

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

Small Storage Tanks (100-1,000 Gallon Capacity)

In accordance with STI Standard SP001 all the small above ground storage tanks at Community College of Rhode Island have been evaluated based on the following conditions:

- Presence of a Continuous Release Detection Method (CRDM)
- Presence of a Spill Control
- Tank Size
- Tank type

As a result, integrity testing is not required as long as inspections are conducted.

Most of the aboveground oil storage tanks at the campus have double-wall containment, making integrity testing impractical. In these cases, the interstitial space on the tank are monitored twice per calendar year by observing the monitoring device or opening the access port or drain plug to the interstitial compartment and examining for leaks. This will be conducted in lieu of integrity testing. This applies to all double-walled tanks including generator tanks.

9.5 Underground Storage Tank Integrity Testing

As there are no underground storage tanks at the CCRI Lincoln Campus, this does not apply.

9.6 Tank/Container Installations – Good Engineering Practices (§112.8(c)(8))

The above ground oil storage tanks are equipped with either liquid level indicators, vent whistles, overflow alarms, or the liquid level can be observed while filling the (e.g., drums, elevator reservoirs).

- Aboveground tanks have vent whistles, fill gauges and/or are observed during filling.
- Liquid levels within drums are observed while filling.

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

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

By implementing containment procedures, providing secondary containment, maintaining a readily available supply of spill control materials, and trained personnel, Community College of Rhode Island minimizes the potential for oil spills occurring at the facility from reaching the sewer system or other pathways to navigable waters of the U.S.

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

Upon discovery, visible oil leaks that result in a loss of oil from tank seams, gaskets, rivets and bolts sufficiently large to cause the accumulation of oil in filling areas shall be promptly corrected. Spill equipment will be maintained nearby in the event of a release.

Leaks are corrected by Physical Plant Department personnel on an as-needed basis and both written and verbal reports are submitted to the Associate Director of the Physical Plant. The individual, who detects the leak, will initiate repairs or calls for a work order to be developed to ensure the repair will take place. Spill equipment is nearby in the event of a release.

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

Mobile oil storage containers were not in use during preparation of this plan; however, secondary containment will be provided if any mobile or portable oil storage containers are used at Community College of Rhode Island Lincoln Campus. The containment system will be designed to contain the capacity of the largest single compartment or container with sufficient freeboard for precipitation.

9.8.1 Integrity Testing

Integrity testing of the aboveground tanks will be performed, if required, in accordance with Steel Tank Institute (STI) SP001-03, Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids. Details regarding inspection requirements and schedules are located in Section 12.

9.8.2 Fail-Safe Engineering

All of the aboveground storage tanks at the facility have high liquid level indicators. The high liquid level indicator is a back-up to established filling procedures which are adequate to prevent overfilling.

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

Oil spills would most likely occur during the off-loading of virgin oils, or during the pump out of used oil. Therefore, oil deliveries and removals are strictly supervised by facility and delivery/removal personnel, as necessary. Delivery/removal personnel and Community College of Rhode Island personnel will adhere to the following standardized transfer procedures:

1. Delivery/removal truck driver reports to appropriate Community College of Rhode Island personnel.
2. All smoking materials will be extinguished.
3. Visually check and verify level of product in the tank.
4. Verify that all drain valves are closed.
5. Verify absorbent materials are available to contain spills that occur outside of secondary containment.
6. Perform product transfer. The driver will remain present and attentive at all times during the entire delivery/removal cycle. Tank shall be filled to no more than 90% of maximum capacity.
7. Check product level in the tank upon completion of transfer.
8. Detach delivery/removal hoses when finished.
9. Drain residual product back into tank.

As previously described, a representative of Community College of Rhode Island will be present during all transfer operations. Additionally, vehicles entering the facility will be notified not to endanger transfer operations through cones or other identification means.

10.1 Buried Piping (§ 112.8(d)(1))

CCRI Lincoln does not currently have any buried piping.

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

CCRI Lincoln does not currently have any out-of-service piping.

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

CCRI Lincoln does not currently have any pipe supports or aboveground pipelines and valves.

10.3.1. Valve and Pipeline Inspections

CCRI Lincoln does not currently have pipelines or valves, thus no inspections are required.

11.0 FUEL DELIVERY OPERATIONS (§112.8(d))

Fuel delivery operations at Community College of Rhode Island Lincoln Campus consist primarily of bulk deliveries of diesel to the respective above ground storage tanks. Contractors are required to follow Community College of Rhode Island's established spill prevention guidelines. It is the policy of Community College of Rhode Island that tank filling activities be performed in compliance with these guidelines

11.1 Department of Transportation Regulations

Tank truck loading/unloading procedures shall meet the minimum applicable requirements and regulations established by the DOT. These include no smoking, keeping fire away, and setting the hand brake of tank trucks prior to loading/unloading and use of wheel chocks to prevent accidental departure prior to disconnection from the tanks. (49 CFR 177.834 and 177.837).

11.2 Fuel Oil Delivery Procedures

Loading and unloading shall always be attended by a qualified Community College of Rhode Island employee (or their designated representative) during fuel transfer. It will not take place during periods of inclement weather. In addition, the following specific procedure will be followed during all bulk shipments:

1. Ensure that the trailer is accurately spotted at the proper unloading area.
2. Tank trailer brakes shall be set and the driver shall remain with the vehicle during the entire unloading period. A physical barrier (wheel chocks, wooden saw horse) will be placed to prevent the possibility of truck movement during the filling operation.
3. Unloading of trailers will be done during daylight hours. If tank filling operations are to be performed at night, they will be performed only under suitable lighting conditions.
4. A Community College of Rhode Island employee will accompany the tank trailer during all diesel fuel deliveries. They will be equipped with spill supplies including oil spill booms. If a storm drain is located within 25 feet of the diesel tank or delivery truck then the storm drain will be bermed using the oil spill booms or covered with a liquid tight cover prior to unloading.
5. Assure that the permanent storage tank is vented before connecting the unloading line.
6. Determine that sufficient space is available in the receiving storage tank to receive the contents of the tank trailer.
7. For any combustible or flammable material (Diesel Fuel, etc.), attach a ground strap from the building to the bumper of the trailer. Smoking, lighting matches, or carrying any flame near the delivery truck during filling operations is prohibited.
8. Ensure that all hoses are connected tightly and that a collection bucket is placed under the trailer-unloading valve.

9. A CCRI representative must inspect the fuel delivery truck for tank tightness prior to fuel off-loading. If fuel leakage is identified the delivery will not be permitted to begin. If leaks are detected during fuel delivery, the delivery must cease immediately.
10. Once unloading or loading has ceased, the hoses will be disconnected so that any material in the lines will gravity drain to the tank. Any small spillage of material will be contained, removed, and disposed of in accordance with Section 15.0 of this plan.
11. Verify tank level after filling.

Tank Truck Loading/Unloading Areas

Loading/unloading areas for oil tanks are not provided with secondary containment for the following reasons:

- Procedures for filling operations exist for all tanks.
- All operations are observed by a qualified individual.
- The tanker truck shall be parked in a manner as to not impact catch basins and manholes in the event of a small release.

Pre-Departure Examination

Prior to filling and departure of any tank car or tank truck, the lowermost drain and all outlets of such vehicles will be closely examined for leakage, and if necessary, tightened, adjusted or replaced to prevent liquid leakage while in transit.

12.0 INSPECTIONS AND RECORDS (§112.7(e))

12.1 Inspection Program and Testing

Petroleum storage areas and secondary containment systems are visually inspected for evidence of leaks, deterioration, and damage, by facility personnel on an informal basis during transfer operations. The operator and maintenance personnel perform informal inspections of the petroleum storage areas during the normal course of operations. Any visible discharges which resulted in a loss of oil from a container would be identified and emergency response procedures would be initiated.

Facility personnel conduct formal inspections on oil storage areas including aboveground storage tanks, containers, and transformers, on a monthly basis. For each formal inspection, an inspection log will be completed by the inspector, and reviewed and signed by an appropriate supervisor. Leaks, deterioration, or damage will be noted on the inspection forms and remedial action, if required, will be initiated immediately.

The fuel tanks and associated piping are inspected on a regular basis, including each time the tank is filled for the following:

- Tanks:
 - Drip marks
 - Discoloration of tanks
 - Evidence of leaked material
 - Corrosion
 - Damaged or worn bolts
 - Cracks
 - Strained or stressed vegetation in close vicinity to the tanks
- Tank Piping:
 - Evidence of leaked stored material
 - Discoloration
 - Cracks
 - Corrosion
 - Bowing of pipe between supports
 - Damaged bolts or gaskets
 - Signs of seepage of stored material on valves or seals
- Secondary Containment
 - Cracks
 - Discoloration
 - Evidence of leaked stored material
 - Corrosion
 - Valve condition
 - Oily residue

Records of these inspections are maintained onsite for at least ten (10) years per RI DEM regulations. A copy of the Oil Storage Areas Monthly Inspection Checklist is included in **Appendix 3**.

12.2 Integrity Testing (§112.8(c)(6))

Federal oil pollution prevention regulations set forth in 40 CFR Part 112 require regular visual inspection as well as integrity testing of oil ASTs/containers on a regular schedule. To comply with this requirement, CCRI has implemented measures equivalent to the requirements of 112.8(c)(6) by adhering to the provisions of the Steel Tank Institution Standard SP001, Inspection of Aboveground Storage Tanks. This standard is hereafter referred to as STI Standard SP001. The standard establishes methods and procedures for the inspection of storage tanks based on the risk of release to the environment with consideration to spill control methods and release detection engineering of the tanks.

CCRI currently stores oil in aboveground containers ranging in size from 55-gallons to 1,000 gallons. Tanks less than 5,000 gallons shell capacity do not fall under “Category 3” tank specifications which are specific to ASTs without spill control and without continuous release detection monitoring, therefore non-destructive shell testing is not applicable in

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan
accordance with STI Standard SP001. This is discussed in greater detail in the following paragraphs.

55-Gallon Drums

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

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

Small Storage Tanks (100 to 5,000-Gallon Capacity)

In accordance with STI Standard SP001, the small storage tanks at CCRI were evaluated for their risk of release to the environment based on the following conditions:

- the presence of a Continuous Release Detection Method (CRDM),
- the presence of spill control equipment,
- the tank size, and
- the tank type.

As a result, integrity testing is not required as long as inspections are conducted.

Most of the aboveground oil storage tanks at the campus have double-wall containment, making integrity testing impractical. In these cases, the interstitial space on the tank are monitored twice per calendar year by observing the monitoring device, i.e., floats in the tank, or opening the access port or drain plug to the interstitial compartment and examining for leaks. This will be conducted in lieu of integrity testing. This applies to all double-walled tanks including generator tanks.

12.3 Recordkeeping Procedure

Inspection records will be maintained for a minimum of ten (10) years per RI DEM regulations. Inspection logs and test records are signed by the appropriate supervisor. Copies of test records may be maintained longer for comparison reasons. Training records will be kept on file for a minimum of three (3) years.

13.0 SECURITY (§112.7(g))

The campus is staffed 24 hours a day by Campus Police. The CCRI Police Department is an investigative body of officers with the sole purpose of maintaining security and safety, and to assist the student/faculty in any problems or questions that may arise.

Normal hours of operation at CCRI are 24 hours per day 7 days per week and 52 weeks per year. The security/college police force is responsible for the following:

- Patrolling and safety of the campus. This is a constant around the clock practice and each officer is trained to check doors, look for anything out of the ordinary, list and report unusual conditions where and when they occur. The patrols are done on foot and by marked vehicle.
- Assembling security reports and making arrests and investigations of all criminal incidents, as well as safety matters. The officers are trained to challenge persons found on campus grounds, during and after hours of operation.
- Verifying that lighting is working and adequate to perform inspections, identify leaks, and prevent spills due to vandalism. Reporting any failures when found.
- Answering security alarms when necessary.

13.1 Fencing and Gates (§112.7(g)(1))

Most above ground storage tanks are in areas that are covered by the security rounds and are typically in high traffic areas. Most drums are kept in areas that are locked after normal hours of operation.

Upon notification that an oil or hazardous materials emergency exists within the facility and concurrently with the incident being assessed by the On-Site Coordinator, the Primary Campus Contact will designate other employees to assist with perimeter security. Upon notification that an emergency exists within the facility, designated personnel will immediately restrict facility access to only essential emergency response personnel. All entry points will be secured immediately, if necessary.

CCRI police officers perform periodic rounds of the campus to ensure campus security and protect college staff and resources.

13.2 Flow Valves, Starter Controls, and Pipeline Loading/Unloading Connections (§112.7(g)(2)&(3)(4))

13.2.1 Valves

There is no master flow or drain valves or any other valves that will permit direct outward flow of the contents of an oil tank to navigable waters.

13.2.2 Pumps

Any starter controls on oil pumps shall be locked in the “off” position or shall be located at a site accessible only to authorized personnel when the pump is in a non-operating or non-standby status.

13.2.3 Standby Service Pipes

The loading/unloading connections of oil pipelines shall be securely capped or blank-flanged when not in service or standby service for an extended time. This security practice shall also apply to pipelines that are not in service or are in standby service for an extended time and have been emptied of liquid content either by draining or by inert gas pressure.

13.3 Facility Lighting (§112.7(g)(5))

Community College of Rhode Island attempts to provide adequate lighting in all areas of the campus for safety and security. This lighting also facilitates the discovery of visible oil spills and discourages vandalism.

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

14.1 Training

In accordance with 40 CFR 112.7(f), all facility personnel who are involved in oil-handling activities (i.e., maintenance personnel, shipping and receiving personnel) will receive annual training in the proper operation and maintenance of equipment to prevent the discharge of oil, the discharge procedure protocols, the applicable pollution control laws, rules, and regulations, the general facility operations, and the contents of the facility Plan. This training will include a mix of on-the-job training as well as classroom training, such as reviewing this SPCC Plan. Personnel will be instructed on the general facility activity, operation of facility storage and transfer mechanisms, emergency response equipment operation and maintenance, and emergency response procedures.

New personnel will be instructed, as appropriate, within a reasonable time after becoming employed. Contractors and other transient personnel will be advised, as appropriate, of applicable spill prevention measures upon entering the site.

Spill prevention briefings will be conducted once per year to ensure that employees have an adequate understanding of this SPCC Plan. These briefings will focus on known spill events, malfunctioning equipment, and recently developed preventive measures. Records of briefings and/or training will be maintained by Community College of Rhode Island.

Community College of Rhode Island personnel, who have been designated as the persons accountable for petroleum spill prevention at the facility, are identified in the general information section at the beginning of this SPCC Plan. These individuals report directly to management at Community College of Rhode Island.

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

15.1 General

The purpose of this section is to provide a readily useable set of procedures that can be followed in an emergency situation, specifically a fire or oil spill. Emergency Coordinators at the facility are listed in section 15.5 of this SPCC Plan under the "Emergency Contact List."

15.2 Spill Response Procedures

Spills or other releases of oil will, in general, be handled in the following manner:

Incidental Releases

The release is incidental and manageable by facility personnel if:

1. The released hazardous substance can be absorbed or otherwise controlled at the time of release by employees or other trained persons present.
2. The release is either inside or outside facility buildings on an impervious surface and does not reach pervious surfaces (i.e., soil) or drains.
3. The released hazardous material is less than 55 gallons.
4. The release would not have posed a threat to human health and the environment if the release had not been immediately controlled.
5. In response to an observed incidental release, the following steps will be taken:
6. If an employee observes a release, the employee will immediately notify a supervisor who will communicate the release to the emergency coordinator. If the supervisor decides the release does not constitute a threat to human health or the environment and does not require assistance by personnel outside the immediate area of the spill, then clean-up will begin.
7. The supervisor or assigned trained persons will clean up the spill. Employees or trained persons cleaning up the spill will be trained in the necessary protective equipment (i.e., goggles, rubber gloves, etc.). If necessary, cleanup will be preceded by an attempt to stop the discharge and limit migration of the release by laying berms.
8. The supervisor or trained personnel will absorb the released material with appropriate disposable materials.
9. The contaminated absorbent materials will be containerized and disposed of by a licensed waste hauler.
10. Materials such as gloves that were contaminated as a result of the release will also be containerized and disposed of by a licensed waste hauler.
11. The emergency coordinator will verify that no incompatible materials mix with the released material until it is treated, stored, or disposed of at the facility until the cleanup is complete.
12. The emergency coordinator will verify emergency equipment listed in the Plan is cleaned and fit for its intended use before operations at the facility resume.
13. The emergency coordinator will monitor for leaks or ruptures in valves, pipes or other equipment before operations resume.

Non-Incidental Releases

A release is considered non-incident if the release has one or more of the following criteria:

1. The released substance cannot be absorbed or otherwise controlled at the time of release by employees or other trained persons present.
2. The release is either inside or outside facility buildings on a pervious surface or may reach pervious surfaces (i.e. soil), or drains.
3. The released material is more than 55 gallons.
4. The release may pose a threat to human health and the environment if the release is not immediately controlled.

The following describes procedures for non-incident hazardous releases:

Upon detection of the release, the discovering employee will immediately notify a supervisor. If the supervisor assesses that cleanup efforts would require the assistance of personnel from beyond the immediate area of the spill, then the supervisor will notify the emergency coordinator that there has been a large release. The supervisor will also relate the extent of or potential for migration of the spill to the environment. The emergency coordinator will take the following steps:

1. The emergency coordinator may decide to evacuate the building or facility in which case the fire alarm will be activated in the affected building.
2. The emergency response contractor will be notified. If deemed necessary by the emergency coordinator, the Fire Department (911) and/or the Police Department (911) will be notified.
3. The emergency coordinator will try to identify the character, amount, source and extent of the release as well as assess the real or potential threats to human health or the environment from this release.
4. If the emergency coordinator believes there exists a threat to human health or the environment outside of the facility and evacuation of local areas may become necessary, then the emergency coordinator will notify the local authorities as well as the National Response Center at (800) 424-8802.
5. The emergency coordinator will verify that no waste incompatible with released materials is treated, stored, or disposed of at the facility until the cleanup is complete.
6. The emergency coordinator will ensure all emergency equipment listed in the Plan is cleaned and fit for its intended use before operations at the facility resume.
7. The emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes or other equipment before operations resume.
8. Materials contaminated as a result of the cleanup will be containerized and disposed of by a licensed waste hauler.

15.3 Spill Response Equipment

All visible spills are immediately stopped and cleaned up using absorbent materials. For small spills Community College of Rhode Island maintains spill kits in strategic locations throughout the campus. The spill kits are kept fully stocked with absorbent cleanup materials (absorbent pads, sand/ buckets/ containers), and are replenished after each use.

Any fire, explosion, or release involving oil or petroleum constituents that cannot be controlled using this equipment requires the assistance of the Emergency Spill Response Contractor found on the Emergency Contact List in section 15.5.

15.4 Spill Reporting Requirements

The emergency coordinator will be responsible for completing necessary reporting to the regulatory agencies.

Certain releases of oil to waters of the U.S. are reportable to the National Response Center. Waters of the U.S. have been interpreted to include wetlands, municipal sewer systems, storm sewers and any tributary that may lead to a navigable waterway.

Immediately following the spill incident, Community College of Rhode Island personnel who were involved with the spill will meet with facility management to determine what steps can be taken to prevent other spills. These individuals will also assess Community College of Rhode Island's response to the release and implement steps that may make a future spill response more efficient. In accordance with 40 CFR 112.4, if the spill incident(s) meet either of the following criteria, a report must be filed:

1. A discharge of more than 1,000 gallons of oil into navigable waters in a single spill event occurs; or
2. A discharge of more than 42 gallons of oil in two spill events within any consecutive 12-month period.

Within sixty (60) days of the occurrence of either of these conditions, the following report will be submitted to the Region 1 Regional Administrator of the Environmental Protection Agency (EPA):

1. Name of the facility;
2. Name(s) of the owner or operator of the facility;
3. Location of the facility;
4. Name and address of the registered agent of the owner or operator, if any;
5. Date and year of initial facility operation;
6. Maximum storage or handling capacity of the facility and normal daily throughput;
7. Description of the facility, including maps, flow diagrams, and topographical maps;
8. A complete copy of the SPCC Plan with all amendments;
9. The cause(s) of such spill, including a failure analysis of the system or subsystem in which the failure occurred;
10. The material and quantity spilled or released;

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan

11. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
12. Additional preventive measures taken or considered to minimize the possibility of recurrence; and
13. Such other information as the EPA Regional Administrator may require pertinent to the Plan or spill event.

A copy of all information provided to the EPA Regional Administrator will likewise be provided, at the same time, to the RI Department of Environmental Management. Additionally, a complete copy of all information provided to EPA and the RI Department of Environmental Management will be maintained in Community College of Rhode Island's on-site records.

15.5 Rhode Island DEM Release Reporting Requirements (Section 46-12.7)

Releases of petroleum shall be reported to the Rhode Island DEM immediately.

- 1) The type of environment that the discharged oil enters, such as, but not limited to, a stream or tributary that is capable of, or has historically supported, anadromous fish; a freshwater environment with significant or substantial aquatic resources; or an estuarine, intertidal, or salt water environment;
- 2) The amount of oil spilled;
- 3) The type of oil spilled;
- 4) The toxicity, degradability, and dispersal characteristics of the oil spilled; and

Any mitigating action that the vessel master or the facility owner or operator may have taken to stop or to control the discharge of oil.

15.6 Contact List (§112.7(a)(3)(vi))

In the case of any oil release or spill the first call shall be made to Community College of Rhode Island Campus Police at 401-825-2000 (identify which campus to dispatcher).

Emergency Coordinators

Primary On-Site Emergency Response Coordinator:

David A. Snow, Interim Director of the Physical Plant
(Work).....401-825-2111
(Emergency).....401-290-7854

Alternate On-Site Emergency Response Coordinators:

Walter Ducharme, Asst. Building and Grounds Officer
(Work).....401-333-7041
(Emergency).....401-255-1018

Second Alternate On-Site Emergency Response Coordinators:

Jeff Aptt, Building and Grounds Officer
(Work).....401-333-7047
(Emergency).....401-742-7816

Emergency Agencies

National Response Center.....800-424-8802
Lincoln Fire Dept. 911
Lincoln Police Dept. 911
Environmental Protection Agency617-223-7265
RI-DEM –Office of Compliance & Inspection.....401-222-1360
RI Emergency Management Agency401-946-9996

Emergency Spill Response Contractor

Clean Harbors Environmental Services401-461-1300 or 800-641-0007
Triumvirate Environmental, Inc.617-628-8098 or 800-966-9282

15.7 Reporting Requirements: U.S. EPA -Significant or Multiple Releases to Surface Water (§112.4)

SPCC regulations require that if any oil storage facility subject to 40 CFR 112 Part experiences a release of either: 1) more than 1,000 U.S. gallons of oil into a waterway, or 2) more than two discharges of 42 gallons or oil or greater into a waterway within any twelve month period, the owner or operator of such facility shall submit to the Regional Administrator (U.S. EPA Region I) and to the State Department of Environmental Management (RI-DEM), within 60 days of the incident (10 days for RI-DEM), the following information:

1. Name of facility;
2. Name(s) of the owner or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures that were taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary;
7. The cause(s) of such discharge, including a failure analysis of system or subsystem in which the failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
9. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Copies of this report should be forwarded to the following addresses:

U.S. EPA Region 1

U.S. Environmental Protection Agency
Region 1- New England
1 Congress Street Suite 1100
Boston, MA 02114

Rhode Island

State of Rhode Island
Department of Environmental
Management
235 Promenade Street
Providence, RI 02908

16.0 Substantial Harm Criteria Evaluation (§112.20)

In accordance with 40 CFR Part 112.20, Community College of Rhode Island is required to determine whether the facility is subject to the Facility Response Plan (FRP) requirements and associated appendices if it is a high-risk facility that poses a threat of *substantial harm* to the environment. As outlined in 40 CFR 112.20(f)(1), a facility has the potential to cause substantial harm if:

- The facility transfers oil over water to or from vessels **and** has a total oil storage capacity, including both ASTs and USTs, greater than or equal to 42,000 gallons; or
- The facility’s total oil storage capacity, including both ASTs and USTs, is greater than or equal to one million gallons, **and** one of the following is true:
 - The facility lacks secondary containment able to contain the capacity of the largest AST within each storage area plus freeboard to allow for precipitation;
 - The facility is located at a distance such that a discharge from the facility could cause injury to an environmentally sensitive area;
 - The facility is located at a distance such that a discharge from the facility would shut down a public drinking water intake;
 - The facility has had a reportable spill greater than or equal to 10,000 gallons within the last five years.

Community College of Rhode Island does not meet the substantial harm criteria in accordance with 40 CFR Part 112.20, and therefore does not have to prepare and submit a Facility Response Plan to the EPA. A certification of the Applicability of the Substantial Harm Criteria Checklist is included below.

CERTIFICATION

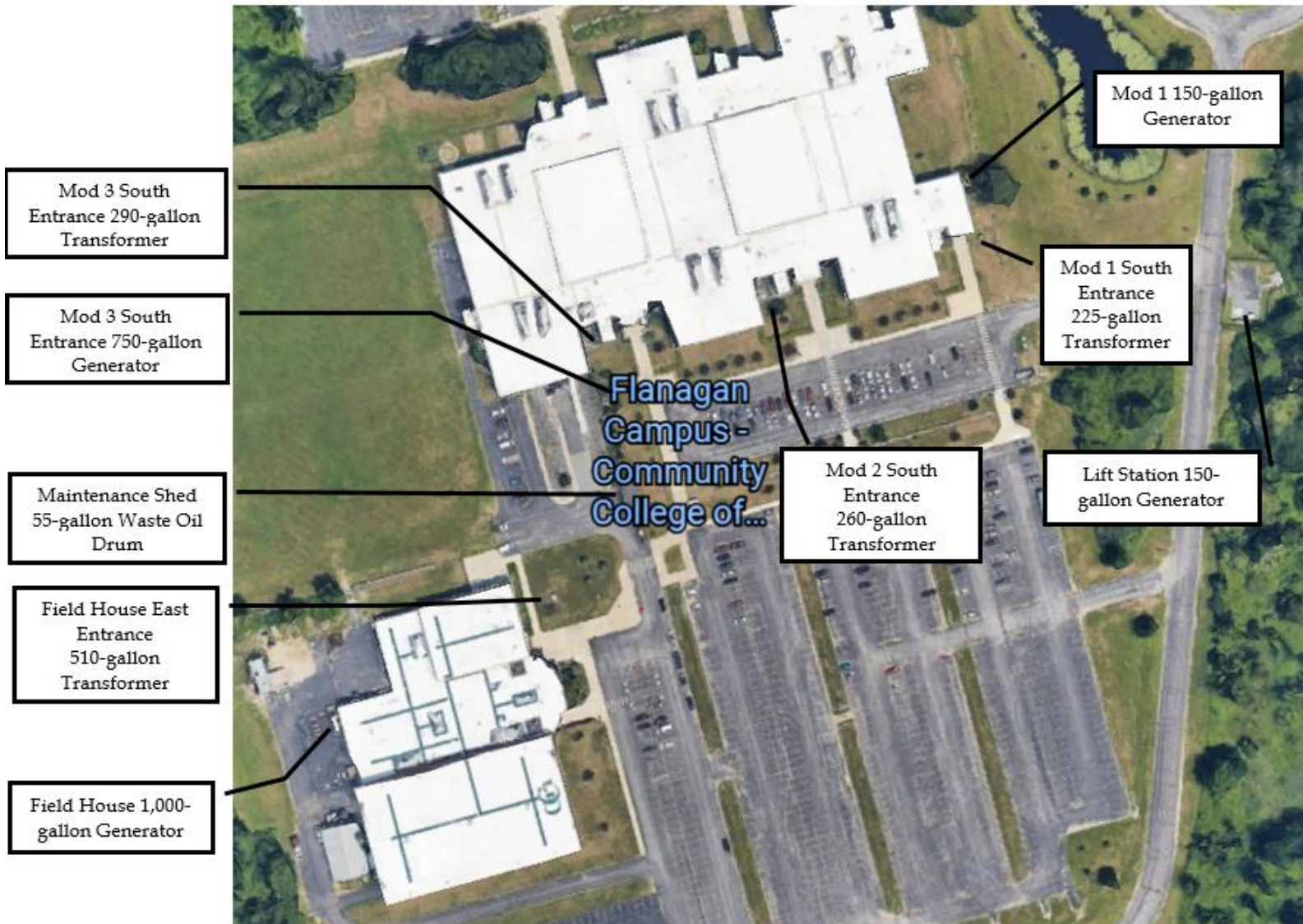
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

NAME

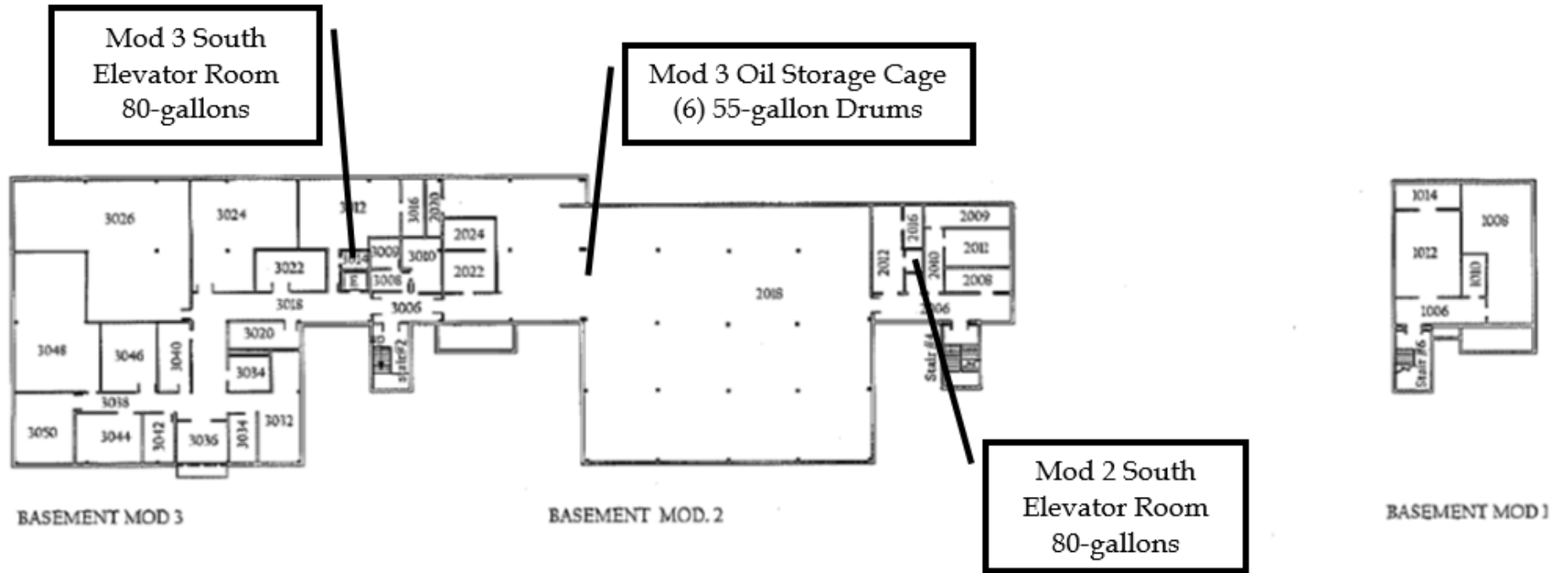
SIGNATURE

DATE

APPENDIX 1 – FACILITY SITE PLAN AND OIL STORAGE LOCATION MAP
Facility Map

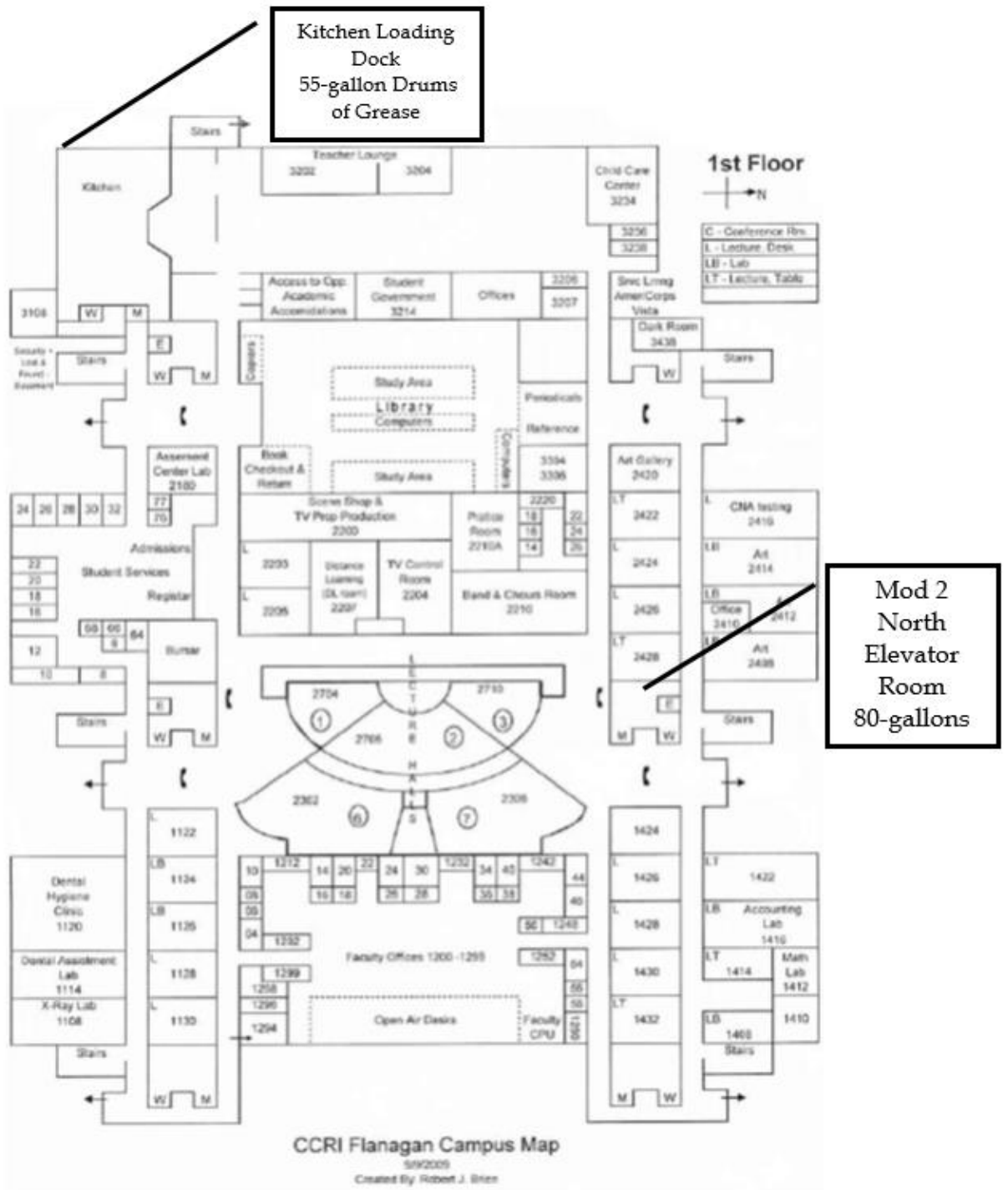


Basement Floor Plan



Community College of Rhode Island
 Oil Spill Prevention Control and Countermeasures (SPCC) Plan

1st Floor Plan



Mod 2
 North
 Elevator
 Room
 80-gallons

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan

APPENDIX 2 – OIL STORAGE MANAGEMENT AREAS

Community College of Rhode Island – Flanagan Campus OIL STORAGE & EQUIPMENT								
Type	Location	Size (gal)	Tank Material	Install Date	Contents	Means of Secondary Containment/Spill Prevention	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails) <i>The flow rates of oils average up to 2 feet per second.</i>
<i>Underground Storage Tanks/Containers - None</i>								
<i>Aboveground Storage Tanks/Containers - Generators</i>								
Generator	Lift Station	150	Steel	N/A	Diesel	Cement Pad	Outside	Non-Directional; Soil
Generator	Outside Mod 1	150	Steel	N/A	Diesel	Cement Pad	Outside	Non-Directional; Soil
Generator	Outside Mod 3	750	Steel	N/A	Diesel	Cement Pad	Outside	Non-Directional; Soil
Generator	Field House	1,000	Steel	N/A	Diesel	Cement Pad	Outside	Non-Directional; Soil
<i>Drums</i>								
	Mod 3 Oil Storage Cage	(3) 55	Steel	N/A	Misc. Oil	Spill Pallet	Inside	Non-Directional
	Maintenance Garage	55	Steel	N/A	Waste Oil	Spill Pallet	Inside	Non-Directional
	Kitchen Loading Dock	(3) 55	Steel	N/A	Waste Kitchen Grease	Spill Pallet	Inside	Non-Directional

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan

**Community College of Rhode Island – Flanagan Campus
OIL STORAGE & EQUIPMENT**

Type	Location	Size (gal)	Tank Material	Install Date	Contents	Means of Secondary Containment/ Spill Prevention	Outside/ Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails) <i>The flow rates of oils average up to 2 feet per second.</i>
<i>Elevators</i>								
	Mod 2 South Elevator Room 2014	80	Steel	N/A	Hydraulic Oil	Contained within room by berm	Inside	Non-Directional
	Mod 2 North Elevator Room 2442	80	Steel	N/A	Hydraulic Oil	Contained within room by berm	Inside	Non-Directional
	Mod 3 South Elevator Room 3014	80	Steel	N/A	Hydraulic Oil	Contained within room by berm	Inside	Non-Directional
<i>Transformers</i>								
	Outside of Mod 1 South Entrance	225	Steel	N/A	Trans. Oil	Cement Pad	Outside	Non-Directional; Soil
	Outside of Mod 2 South Entrance	260	Steel	N/A	Trans. Oil	Cement Pad	Outside	Non-Directional; Soil
	Outside of Mod 3 South Entrance	290	Steel	N/A	Trans. Oil	Cement Pad	Outside	Non-Directional; Soil
	Outside of Field House East Entrance	510	Steel	N/A	Trans. Oil	Cement Pad	Outside	Non-Directional; Soil

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan

APPENDIX 3 – OIL STORAGE AREAS MONTHLY INSPECTION CHECKLIST

Oil Storage Area Inspection Checklist

Container Description	Location	Is the area around the tank free of any visible signs of leakage?	Does the piping show signs of corrosion or leaks?	Does the pump or hoses show signs of leaks or cracking?	Is the tank gauge readable at the fill point and operating as designed?	Is all leak detection, monitoring, cathodic protection and/or warning systems operational?	Is there liquid in the primary tank, interstice, dike, or spill container?	Is the overfill prevention equipment in good working condition?	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation?	Is there debris in containment or spill container, and is the spill container in good condition?	Are the dike drain valves or plugs operable and in a closed position?	Is the information in the SPCC Plan kept up to date?	Comments
Generators													
AST - Emergency Generator	Lift Station												
AST - Emergency Generator	Mod 1												
AST - Emergency Generator	Mod 3												
AST - Emergency Generator	Field House												
Elevators													
AST - Elevator	Mod 2 North												
AST - Elevator	Mod 2 South												

Community College of Rhode Island
Oil Spill Prevention Control and Countermeasures (SPCC) Plan

AST - Elevator	Mod 3 South												
Transformers													
AST - Transformer	Mod 1 South Entrance												
AST - Transformer	Mod 2 South Entrance												
AST - Transformer	Mod 3 South Entrance												
AST - Transformer	Field House East Entrance												
Drums													
55-gallon Drum(s)	Kitchen Loading Dock (3)												
55-gallon Drum(s)	Mod 3 Storage Cage (3)												
55-gallon Drum(s)	Vehicle Maintenance Garage (1)												