

**SPILL PREVENTION CONTROL
AND COUNTERMEASURE
(SPCC) PLAN**



**TEXAS WOMAN'S
UNIVERSITY™**

P.O. Box 425619
Denton, Texas 76204

Approved: December 2018
Revised: December 2021

Prepared by

EFI Global, Inc.

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I. PROFESSIONAL ENGINEER'S CERTIFICATION – 40 CFR 112.4 (d)

My agent, Randy S. McDermott, PE, and myself, Kim I McGraw, PE, certify that Randy S. McDermott, PE has visited and examined the facility, and being familiar with the provisions of Title 40, Code of Federal Regulations (CFR), Part 112, attest that this Spill Prevention Control and Countermeasure (SPCC) Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of Title 40, CFR Part 112. Procedures for required inspections and testing have been established and this Plan is adequate for the facility.



Mr. Kim I. McGraw, PE

Kim I. McGraw

Professional Engineer Signature

12/31/2021

Date



Mr. Randy S. McDermott, PE

Randy S. McDermott

Professional Engineer Signature

12/31/2021

Date

Facility Name: Texas Woman's University

Location: Denton, Texas 76209

Date of Plan: December, 2021

* A PROFESSIONAL ENGINEER MUST CERTIFY TECHNICAL AMENDMENTS TO THE PLAN. PE CERTIFICATION IS NOT REQUIRED FOR NON-TECHNICAL AMENDMENTS SUCH AS CHANGES TO PHONE NUMBERS, NAMES, ETC. AT LEAST ONCE EVERY 5 YEARS THE SPCC PLAN MUST BE RE-CERTIFIED BY A PROFESSIONAL ENGINEER.

II. SPCC PLAN REVIEW – 40 CFR 112.5 (b)

In accordance with 40 CFR 112.5(b), the owner/operator of the facility will conduct a review and evaluation of this Spill Prevention Control and Countermeasure (SPCC) Plan at least once every 5 years. Texas Woman's University will amend the SPCC Plan within 6 months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a discharge from the facility, and (2) if such technology has been field-proven at the time of review. Evidence of these reviews shall be recorded below.

"I have completed a review and evaluation of the SPCC Plan for the Texas Woman's University located in Denton, Texas on _____ (date) and (will/will not) amend the Plan* as a result."

(Signature)

(Name and Title)

"I have completed a review and evaluation of the SPCC Plan for the Texas Woman's University located in Denton, Texas on _____ (date) and (will/will not) amend the Plan* as a result."

(Signature)

(Name and Title)

"I have completed a review and evaluation of the SPCC Plan for the Texas Woman's University located in Denton, Texas on _____ (date) and (will/will not) amend the Plan* as a result."

(Signature)

(Name and Title)

III. MANAGEMENT APPROVAL – 40 CFR 112.7

The management of the Texas Woman's University located in Denton, Texas hereby approves this SPCC Plan and is fully committed to the implementation of the SPCC Plan as described herein.

Drew Townsend
Director of Environmental, Safety & Health

Date

IV. INTRODUCTION – 40 CFR 112.5 (a)

This SPCC Plan has been prepared for the Texas Woman's University (TWU) located in Denton, Texas. This SPCC Plan was prepared to meet the following objectives:

- To detail the operating procedures to reduce the possibility of oil discharge;
- To specify control measures to be followed to reduce the possibility of a discharge from entering navigable waters (as defined in the regulations below);
- To outline countermeasures to contain, clean-up, and mitigate the effects of a discharge that may impact navigable water; and
- To provide a guideline for notifying state and federal agencies in the event of a discharge.

This SPCC Plan has been developed in accordance with the requirements of the U.S. Environmental Protection Agency (EPA) Title 40, Code of Federal Regulations, Part 112 (40 CFR 112), "Oil Pollution Prevention". The Federal Water Quality Review Act of 1970, the primary law which governs the discharge of oil into or upon navigable waters of the United States, prohibits the discharge of oil in quantities which may be harmful to the public health or welfare or the environment of the United States. "Oil Pollution Prevention" (40 CFR 112) was promulgated in 1973 pursuant to Section 311 of the Federal Water Pollution Control Act Amendments of 1972.

On July 17, 2002, EPA published modifications to the SPCC requirements in the Federal Register (Volume 67, No. 137, pages 47041-47152). Changes were effective August 16, 2002. The EPA granted several extensions to the compliance date proposed in 40 CFR 112.3 (a) and (b). On April 1, 2009, the reference compliance dates were extended to require an onshore or offshore facility

in operation prior to August 16, 2002, to ensure compliance on or before November 10, 2010 and to implement the amended plan as soon as possible, but no later than November 10, 2010. A facility that becomes operational after August 16, 2002 through November 10, 2010 and could reasonably be expected to have a discharge as described in 40 CFR 112.1(b) must prepare a Plans on or before November 10, 2010 and fully implement it as soon as possible but no later than November 10, 2010. A facility that becomes operational after November 10, 2010 and could reasonably be expected to have a discharge as described in 40 CFR 112.1(b) must prepare and implement a Plan before it begins operations.

According to 40 CFR 112.2, oil is defined as “oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and other oils and greases, including petroleum, fuel oil, sludge, synthetic oil, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.” Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying or dumping. Navigable waters include “all navigable waters of the United States...and tributaries of such waters.” As defined in 40 CFR 110.3, discharges of oil in such quantities deemed to be harmful to the public health or welfare of the United States include discharges that:

- Violate applicable water quality standards; or
- Cause 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.

According to 40 CFR 112, a SPCC Plan must be prepared and implemented by a facility if a discharge from the facility could reasonably be expected to discharge oil in harmful quantities as defined in 40 CFR 110 into or upon the navigable waters of the United States or adjoining shorelines due to its location and if any of the following conditions apply:

- The aggregate aboveground oil storage capacity of the facility is greater than 1,320 gallons; or
- The completely buried oil storage capacity of the facility is greater than 42,000 gallons.

The following chart summarizes SPCC Plan applicability criteria and this facility's status relative to these requirements.

Texas Woman's University SPCC Plan Applicability Criteria		
Applicability Criteria	Texas Woman's University Conditions	SPCC Plan Required
A. Total underground volume greater than 42,000 gallons	No Total = 11,000 gallons	No

B. Total aboveground volume greater than 1,320 gallons	Yes Transformers approx. 10,000 gallons Emergency Generators approx. 5,300 gallons ASTs (Non-Generator) 32,600 gallons Drum Storage Areas approx. 550 gallons	Yes
C. Reasonably expected to discharge oil in harmful quantities to navigable water	Yes Proximity to navigable waterways*	Yes

*The potential for spills or leaks of harmful quantities of oil to enter the storm drain system. Surface drainage is designed, in part, to flow into the waterway located on the TWU golf course on the eastern portion of campus and drains into the city storm drains on the western portion of the campus.

The requirement to prepare an SPCC Plan is applicable to the TWU located in Denton, Texas based on its status as a non-transportation-related onshore facility which stores oil or oil products in excess of the above-listed threshold values and which, based on its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines.

Per 40 CFR 112.5(a), this SPCC Plan must be amended whenever there is a change in facility design, construction, operation or maintenance, which materially affects the potential for a discharge. Furthermore, per 40 CFR 112.4, the United States Environmental Protection Agency (EPA) Regional Administrator may require amendment of the SPCC Plan whenever the facility has:

- Discharged more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single discharge;
- or-
- Discharged more than 42 gallons of oil in each of two discharges into or upon navigable waters of the United States or adjoining shorelines, occurring within any 12-month period.

Technical amendments to the SPCC Plan shall be certified by a registered Professional Engineer and must be implemented within 6 months. Amendments will be forwarded to all persons having copies of this SPCC Plan for insertion into the SPCC Plan.

V. SPCC POSTED AT FACILITY – 40 CFR 112.3(e)

Pursuant to 40 CFR 112.3(e) a complete copy of the SPCC Plan shall be maintained at the facility by the facility owner or operator, if the facility is attended for at least four hours per day.

The facility is attended at least four hours per day and for this reason a copy of the facility SPCC Plan is available at TWU. The SPCC Plan is located at 1605 N. Locust St. in Denton, Texas, specifically in the Director of Environmental, Health and Safety's Office.

VI. FACILITY RESPONSE PLAN – 40 CFR 112.20(f)

While the preparation of an SPCC Plan is required for oil management, this facility is not required to prepare a Facility Response Plan as defined in 40 CFR 112.20. Facility Response Plans are required for non-transportation-related onshore facilities that, because of their location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines. Based on the fact that this facility does not transfer oil over water to or from vessels (based on U.S. EPA criteria) and does not have a total oil storage capacity greater than or equal to 1 million gallons, the preparation and submittal of a Facility Response Plan is not required, unless it is required at a future date at the discretion of the U.S. EPA Regional Administrator. Pursuant to Section 3.0 of Appendix 3 to 40 CFR 112, certification of the non-applicability of the substantial harm criteria is provided. This certification is provided as Appendix 2.

VII. FACILITY INFORMATION

- Name of Facility: Texas Woman's University
- Street Address: The portion of the TWU campus covered by this Plan is generally bounded by University Drive to the north; North Locust Avenue to the west; Texas Street to the south; and the North Ruddell Street to the east. Additional adjacent properties have been or will be acquired for campus expansion, see Figure 1.
- Mailing Address: Texas Woman's University
P.O. Box 425619
Denton, Texas 76204
- Owner: Texas Woman's University
- Designated Person Accountable for Oil Spill Prevention at the Facility:
Mr. Drew Townsend, Director of Environmental, Safety and Health
940-898-3129 (Business)
940-898-4001 (Emergency)

See Section XXIII: Spill Response and Emergency Procedures for a complete list of emergency contacts.

VIII. FACILITY LOCATION AND DESCRIPTION – 40 CFR 112.7(a)(3)

The Texas Woman's University (TWU) is located in Denton, Texas. TWU was originally established in 1901, opening its doors in 1903 with a current enrollment of approximately 15,500 students. The facility location is shown on Figure 1.

In June 1998, TWU installed two underground storage tanks (USTs) located at the Facilities Management Center (FMC) consisting of one 10,000-gallon UST containing gasoline and one 1,000-gallon UST containing diesel. Both USTs were fiberglass-reinforced plastic (FRP) double wall tanks with a factory-built nonmetallic jacket with interstitial monitoring within the secondary wall/jacket. Automatic line leak detectors and automatic high-level alarms with automatic delivery shut-off valves were installed. In April 2021, these two USTs were taken out of service, and the contents were placed in two temporary 1,000-gallon steel above ground storage tanks (ASTs) with open secondary containment. These will remain in place until permanent ASTs are acquired. The permanent replacement AST's will be placed south of the Facilities Management and Construction (FMC) Greenhouse Buildings and will have one unleaded AST not to exceed 10,000 gallons and one diesel AST not to exceed 2,000 gallons. The old USTs have been emptied, locked and placed out of service in accordance with TCEQ regulations.

Electrical power is supplied via a loop system to campus by an outside provider; TWU personnel maintain the transformers and emergency generators located on campus. Currently, TWU has twelve diesel emergency generators with associated diesel-containing above ground storage tanks (ASTs) with a total fuel volume of approximately 5,300 gallons. There are 8 natural gas emergency generators as well. In addition to the two temporary 1,000-gallon ASTs located at the FMC Service Center Auto Shop mentioned above, two-15,000-gallon ASTs containing diesel are located at the Central Plant. At the Central Plant, fuel is transferred from the ASTs to boilers through aboveground piping. One double-walled 500 gallon used oil tank is also located at the Central Plant adjacent to the ASTs and there is a 100-gallon portable fueling tank.

Approximately forty-nine (49) oil-filled electrical transformers are located throughout the TWU campus on concrete pads except one that is located at the Concession Stand area near the athletic fields, including pending units in the construction phase. An estimated volume of dielectric oil for these transformers is approximately 10,000 gallons.

Approximately twenty-five (25) hydraulic elevators are located within twenty buildings. Inspection reports for the elevators do not report the volume of hydraulic oil stored for each elevator. The volumes for each elevator will be recorded and incorporated into Table 3 if known.

Two oil/water separators (OWS) are located at TWU. One is located at Oakland Complex in the event of an elevator hydraulic fluid leak and the second is at the Auto Shop OWS separate oil from washing the bay floors or minor spills of new or used oil. The Auto Shop maintains various quantities of 55-gallon drums of new and used oil. Containers stored outdoors or near the roll-up door are stored on secondary containment pallets, other containers would be contained by the building with excess draining to the OWS.

Four kitchen areas, the Hubbard Hall dining area, the Dining Hall, the Oakland Complex restaurant and the Woodcock Hall Nutrition and Food Science kitchen manage new and used cooking oil/grease. The Nutrition and Food Science kitchen stores new and used cooking oil in plastic one-

gallon jugs and contacts EH&S for pickup and disposal via their waste vendor. The Oakland Complex restaurant, not having a deep fryer, does not use grease dumpster but does have a grease trap. The Hubbard Hall dining area and the Dining Hall both have "Total Oil Management" systems from Restaurant Technologies. The system is identical in both buildings and is comprised of a 100-gallon new oil and 100-gallon used oil/grease container located within the respective buildings. The tanks are plumbed to the fryers, as well as to exterior walls so that new oil can be delivered to the fryers, and waste oil delivered to the waste tank. Deliveries of new oil and retrieval of spent oil is done via service trucks connecting to the plumbing in a locked outdoor fill box.

Two ASTs with open secondary containment are located at the FMC Service Center and store gasoline (1,000 gallon) and diesel (1,000 gallon) for refueling of various types of equipment used at TWU. TWU personnel utilize a truck-mounted diesel-containing AST to refuel emergency generators. Fuel for the ASTs is obtained from the diesel fixed AST located at the Service Center. The mobile tank is a steel single-wall container equipped with an electric pump and typical flexible hose and nozzle for transferring of fuel to each generator tank and is generally parked in the Central Plant lot adjacent to the ASTs. The Service Center also maintains an approximately 500-gallon double wall used oil tank that is located in the Golf Cart Barn adjacent the FMC Service Center. Tables 1, 2, 3, and 4 contain information regarding oil containing equipment located at TWU.

Table 5 summarizes past spills that have been reported to FMC or Risk Management.

IX. FACILITY OIL STORAGE CAPACITY DESCRIPTION – 40 CFR 112.7(a)(3)(i)

The TWU facility maintains the following oil storage in capacities equal to or greater than 55-gallons:

Storage Type	Category	Units
Above ground storage tanks	Bulk storage container	4 ASTs
Emergency generator tanks	Bulk storage container	12 ASTs
Oil-filled Transformers	Equipment	49 units
Elevator hydraulic units	Equipment	25 units
Used Cooking Grease Containers	Bulk storage container	2 units
Oil/Water Separators	Equipment	2 units, one with upstream sand trap
55-gallon drums	Bulk storage container	2 cooking grease and various new and used oil drums
Refueling Tank	Bulk storage container	1 AST
Used oil storage tank	Bulk storage container	1 55-gallon AST and 1 500-gallon AST
New Cooking Oil Containers	Bulk storage container	2 100-gallon containers

Storage of oil in bulk storage containers is specifically defined at 40 CFR 112.2 as follows:

“Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce.

Bulk oil storage containers include both ASTs and 55-gallon drums. These containers are subject to numerous technical provisions of SPCC regulations including:

- Periodic integrity testing of bulk oil storage containers [40 CFR 112.7(d)],
- Requirements for secondary containment [40 CFR 112.8(c)(2) or 112.8(c)(11)],
- Inspection of secondary containment effluent, if any, prior to discharge [40 CFR 112.8(c)(3)],
- Testing and inspection and recordkeeping for the AST on a regular basis [40 CFR 112.8(c)(6)],
- Provision for high liquid level alarms or high liquid level pump cutoff or direct audible signal between the container and pumping station or a fast response system for determining the liquid level [40 CFR 112.8(c)(8)],
- Inspection of piping and valving [40 CFR 112.8(d)(4)], and
- Security including illumination, and locking fill and discharge points [40 CFR 112.7(g)].

As indicated by the definition of bulk oil storage container at 40 CFR 112.2:

“Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.”

The operational use of oil is exempt from the secondary containment required for bulk storage containers (40 CFR 112.8(c)). However, the operational use of oil is still subject to other SPCC requirements, including the general requirements of 40 CFR 112.7(c) to provide appropriate containment and/or diversionary structures to prevent discharged oil from reaching a navigable watercourse. This more general requirement meets the needs of section 311(j)(1)(C) of the CWA.

The storage container locations and capacities are listed in Tables 1, 2, 3, and 4. The locations of the emergency generators and oil-filled transformers are shown on Figure 2.

X. POTENTIAL SPILL DIRECTIONS VOLUMES AND RATES – 40 CFR 112.7 (b)

The potential exists for a discharge or release of oil from storage tanks, piping, or oil transfer operations to occur at the facility. Potential release scenarios are identified in Tables 1, 2, 3, and 4, and are based on a worst-case event (i.e., failure of the largest single tank or the largest tank truck compartment in a given area). These tables also provide the estimated rate that would be associated with a given release.

In general, spill events at the facility may occur during routine filling operations or due to unforeseen events such as corrosion failure of the tank or piping system or breaks or leaks in the tank or fuel transfer piping. Spill events resulting from fuel transfer would be limited to the volume of oil present in the largest compartment of the fuel supply vehicle, generally 5,000-gallons or less. However, control measures including fully manned operations will reduce the potential for spill events of this magnitude.

The inferred direction of oil spills is shown on Figure 2 for emergency generators and transformers at the facility. Drainage and oil spill flow patterns are anticipated to follow the site topography in the immediate area of any potential spill or release event.

All diesel and unleaded ASTs are double walled with open secondary containment. In addition, the pending replacement of the out of service USTs with permanent ASTs will be double walled with open secondary containment. Fluids during a spill/leak event would be expected to be captured in the secondary containment.

Emergency generators are double walled with sight gauges. Four emergency generators; located at the Graduate Research Building (GRB), Guinn and Stark Halls and the Administrative and Conference Tower (ACT); are located adjacent a storm drain or floor drain that could receive fluids during a spill/leak event. There are eight additional emergency generators containing diesel that are on concrete pads outdoors; soil could receive fluids during a spill/leak event.

Leaks of hydraulic oil from transformers are anticipated to be minimal and would be expected to occur only at locations where seals or gaskets are degraded or as the result of catastrophic events such as vandalism or vehicular collision. In general, minor releases of dielectric fluids at transformers are anticipated to flow down the outside of the transformer to the concrete pad upon which the transformer sits. One pod transformer located at the Concession Stand Area near the athletic fields is located directly on the ground where leakage would be absorbed by the soils surrounding the unit. If a leak or spill is of sufficient quantity, it has the potential to migrate over pavement to a storm drain if the discharge is aided by precipitation.

Elevator oil reservoirs are contained within the building they service; therefore, there is no potential to discharge outside the building.

New and used cooking oil are stored within the buildings using them. No more outdoor grease dumpsters are utilized anymore. Therefore, there is no potential to discharge outside the building.

New and used oil located at the FMC Service Center Auto Shop is either stored on heavy poly drum pallets with the capacity to contain at least 55 gallons of oil, or stored indoors where leaks and spills would be to the concrete floor and would potentially flow to floor drains that drain to an OWS and then to a POTW.

Fuel spills during the filling of the two ASTs near the FMC Service Center Auto Shop would flow to the concrete and then north towards the Service Center.

The truck-mounted AST used to refuel emergency generators would spill in various directions depending on where the truck is parked. When the truck is not being used it is parked at the Central Plant Area where leaks would be to asphalt and would flow southeast to grass and soil near the transformers adjacent the parking lot. A spill kit will be maintained with the truck.

XI. CONTAINMENT AND DIVERSIONARY STRUCTURES – 40 CFR 112.7(c) & 112.8(c) (2)

TWU utilizes various equipment and materials to prevent harmful quantities of oil from reaching navigable waterways or adjoining shorelines. These include pads, booms, drain covers, and sorbent materials located in readily identifiable locations.

XII. DEMONSTRATION OF PRACTICABILITY – 40 CFR 112.7(d)

The Plan does not deviate from the requirements of 112.7(c), 112.7(h)(1), 112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) except for facility dispensing areas where secondary containment has been deemed impractical. These areas are supplemented with engineering and administrative measures to prevent a discharge.

Where loading/unloading operations occur, there are two types of applicable operations, transfer operations and dispensing operations. Transfer operations are designated as operations involving a truck being connected to tank piping/fill port located on generator tanks, ASTs, TWU vehicles, and other equipment. Areas where transfer operations occur are not equipped with secondary containment. Dispensing operations at the facility are conducted when a vehicle operator dispenses the tank contents into a truck, equipment or other vehicle. There are no secondary containment structures relating to dispensing operations, but spill prevention procedures are in place.

Prior to filling or withdrawing fuel, inspection of the vehicle or equipment is required. Prior to tank truck departure, all flexible transfer lines must be disconnected, and the lowermost drain and all other outlets of the vehicle should be closely inspected for any leakage, and if necessary, tightened, adjusted, or replaced to prevent leakage while in transit.

Fueling of emergency generators and miscellaneous equipment takes place throughout the day. FMC personnel transferring fuel at one of the four emergency generators that has a drain in the immediate vicinity (See Section X above) will ensure that drain covers and other spill response material/equipment is available for use prior to initiating the transfer.

XIII. PERSONNEL, EDUCATION AND DISCHARGE PREVENTION PROCEDURES – 40 CFR 112.7(f)

The Oil Pollution Prevention regulations require owners and operators of the facility to properly instruct their oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.

Discharge prevention briefings are required to be presented to oil-handling personnel and other affected employees at least once a year to ensure adequate understanding of the SPCC Plan for the facility. These briefings must highlight and describe known discharges as described in 40 CFR Section 112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures. Training of facility personnel is also essential to ensure that personnel involved with the fueling and maintenance of the petroleum storage systems know the proper actions to take in the event of a spill or release. Topics discussed during annual training briefings will include:

- A. Proper operation of equipment to help protect against releases/discharges;
- B. Applicable local, state, and federal pollution regulations;
- C. TWU operations, policies and procedures including tank loading procedures, spill equipment location and use;
- D. Specific provisions of this SPCC Plan, including emergency spill reporting and notification procedures and contact persons; and
- E. Known discharge, failures, malfunctioning equipment and any precautionary measures developed as a result of such discharges, failures, or malfunctioning equipment.

Facility personnel who are responsible for accompanying the fuel supply vendor during fueling operations, and the regular inspection and maintenance of the tank systems shall be trained in the tank loading procedures, the use of the spill containment/response equipment, and the proper spill notification and reporting procedures. These personnel must also be familiar with this SPCC Plan to ensure that in the event of a spill, they are capable of following the appropriate procedures for spill response and reporting. Personnel SPCC training must be conducted for the above-identified personnel, whenever new personnel are assigned the above responsibilities. Records of all SPCC training and briefings shall be maintained in Appendix 5 to document compliance with these requirements.

During refueling operations, fuel tankers are met by an FMC representative. Spill equipment is made available for use during fueling of the, ASTs, generator tanks, and TWU vehicles/equipment. Drain covers or other spill response materials/equipment will be made available for use during fueling of the four generators that have drains in the vicinity of the generators (See Section X above).

Cooking grease is transferred via a "Total Oil Management" system from Restaurant Technologies and is all done via engineered controls and hard piping. There are built in alarm systems for overflow prevention, leaks, etc. Absorbent material or other spill response materials/equipment will be available in the event a spill occurs.

In case of spills greater than five gallons, external resources (contractors) have been identified to assist TWU personnel, if needed. At a minimum, contractors identified to assist in a spill response have the capabilities to provide emergency response, industrial power vacuuming, tank and pipeline cleaning, building decontamination, excavation/earthmoving, and waste transportation and disposal services. Risk Management is responsible for maintaining this list and providing contact information to other TWU departments as necessary.

XIV. SECURITY – 40 CFR 112.7 (g)

TWU maintains a campus police force (TWU's Department of Public Safety) that patrols the university on a 24-hour, 7-days per week basis. The fuel pumps associated with the temporary ASTs at the FMC Service Center are locked and cannot be operated without oversight by an Auto Shop employee. The future replacement ASTs will not operate without an electronic key and key pad code given to authorized employees. Emergency generator tanks and oil-filled transformers are located within a locked metal jacket. Lighting is provided throughout the campus to assist in deterring vandalism.

XV. FACILITY TANK CAR & TRUCK UNLOADING/LOADING – 40 CFR 112.7(H)

Bulk oil unloading is conducted at the four ASTs at the facility. The fuel unloading areas at this facility do not consist of "rack" areas where multiple tanks are filled by one common fill pipe. Thus, the regulatory requirements specified under 40 CFR 112.7(h), especially those under 112.7(h)(1) requiring a containment system to hold at least the maximum capacity of any single compartment of a tank car unloaded at the facility, are not applicable. Instead, spill kits are available nearby to respond to any spills during unloading operations.

Tank loading for the ASTs is conducted under the supervision of facility personnel to ensure that proper procedures are followed and to ensure that a TWU representative is present in the event of a release. During the transfer of fuel to the storage tanks, facility and oil delivery vendor personnel shall perform continuous inspections of the tank truck, fuel hose, the receiving tank, and tank oil level monitoring systems to ensure that spillage and overfilling do not occur. Typical unloading practices include hose inspection, securing manifolds and valves, and the use of wheel chock blocks to prevent premature disconnection of the tank truck from the fill port. Tank gauges and fuel levels should be inspected prior to filling to ensure that the volume available in the tank is greater than the volume of fuel to be transferred. Tank trucks in the process of being unloaded must be attended to at all times during fuel unloading. Transfer procedures are provided in Appendix 1.

XVI. BRITTLE FRACTURE – 40 CFR 112.7(I)

No field-constructed ASTs exist at this site, thus the requirement for a brittle fracture evaluation is not applicable.

XVII. FACILITY DRAINAGE – 40 CFR 112.8(B)

The facility drainage system and the inferred direction of oil spills are shown on Figure 2 for emergency generators and oil-filled transformers. Drainage patterns generally follow site topography in the immediate area of any potential spill or release event.

In general, stormwater flows via sheet flow and has the potential to discharge to the low-lying swales and drainage areas during precipitation events. Various swales and storm drainage structures direct runoff from the eastern portion of TWU to the water drainage feature where the old golf course was located. The western portion of the campus flows to the City of Denton storm system.

XVIII. BULK STORAGE TANKS – 40 CFR 112.8(C)

The federal Oil Pollution Prevention regulations governing bulk storage tanks address USTs, ASTs, and containers with capacities of 55 gallons or greater. The oil storage containers currently in use at the facility are constructed of materials that are compatible with the contents and conditions in which they are stored. Spill prevention equipment and operation is summarized in Table 6.

XIX. SECONDARY CONTAINMENT DRAINAGE – 40 CFR 112.8 (C)(3)

ASTs located by the Central Plant have a double-walled tank. The outer wall is sealed, which prevents precipitation from entering the containment. Therefore, drainage of rainwater from the secondary containment is not necessary. Double-walled ASTs by the FMC Service Center Auto Shop have open secondary containment. Stormwater will be subject to a visual inspection by a competent person. If no visible sheen or signs of contamination are observed, rainwater will be released to a storm drain. If a visible sheen or signs of contamination are observed, then TWU will secure a pump truck to pump out the contaminated rainwater. Contaminated rainwater will be properly disposed of via a licensed waste disposal vendor.

XX. INSPECTION AND RECORDS – 40 CFR 112.8 (C)(6)

The Oil Pollution Prevention regulations require that inspections and tests be conducted in accordance with written procedures that are developed by the facility or certifying engineer. Written procedures and a record of inspections and tests, signed by the appropriate supervisor or inspector, must be kept with the SPCC Plan for a period of at least three years (40 CFR Section 112.7(e)). The inspections are conducted to detect potential equipment problems that can lead to

spills of oil. Inspection frequency varies depending on the type and use of the equipment. A visual inspection is the simplest way to detect deteriorated, corroded or failed equipment. During inspections, facility personnel may discover deficiencies in equipment or in procedures that should be reported to FMC immediately. Since corroded parts of oil containing equipment will eventually lead to leakage and rupture, early detection and replacement of faulty equipment is necessary to prevent oil spills. Any significant deterioration, discharge or damage identified during visual inspection related to the tank's integrity will be repaired and subsequent integrity testing performed in accordance with industry standards.

TWU will implement an inspection and monitoring program for the oil storage tanks, emergency generator tanks and potential oil spill and drainage areas. Facility personnel will visually inspect and document the condition of bulk oil storage containers on a regular basis. ASTs located at the Central Plant will be inspected nightly, and emergency generators will be visually inspected at least monthly. Elevators will have an annual inspection performed by an outside contractor.

Inspection logs must be completed and signed by the person conducting the inspection, and the original signed records transmitted to the Director of Environmental Health and Safety, to be maintained on file with the SPCC Plan. Alternately, the location of the inspections can be noted in the SPCC Plan. These inspections are completed by FMC personnel familiar with the oil-containing systems and this SPCC Plan, to ensure that the equipment is maintained in an operational and safe condition.

The tank inspections are documented on inspection checklists and generally include the following:

- Inspection of exterior surfaces of tanks, pipes, valves, and other equipment for leaks and maintenance deficiencies;
- Identification of cracks, areas of wear, corrosion and thinning, poor maintenance and operating practices, excessive settlement of structures, separation or swelling of tank insulation, malfunctioning equipment, and structural and foundation weaknesses;
- Inspection of all aboveground valves and piping associated with the tanks including the general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces;
- Inspection of tank supports and foundations;
- Inspection of leak detection systems or other monitoring or warning systems that may be in place at the facility; and
- Inspection of spill response equipment to ensure that it is present and fully stocked.

There is no buried fuel piping in operation at this time so the requirements of 40 CFR Section 112.7(e)(3) do not apply.

The following records should be maintained for the operational life of each tank:

- Original tank and system installation records, design specifications, and operation and maintenance manuals;
- Records of modification to the storage tank or storage tank system;
- Any permits issued for the storage tank system;
- Current registration certificates;
- Routine inspection and maintenance checklists;
- Third-party inspection reports;
- Education Sessions; and
- Reports and comparison records of tank and pipe testing.

XXI. PORTABLE OIL STORAGE – 40 CFR 112.8 (C)(11)

TWU uses a portable truck-mounted 100-gallon single wall steel tank used to refuel emergency generator ASTs with diesel. At night and during times the truck is not used, it is parked at the Central Plant lot.

XXII. FACILITY TRANSFER OPERATIONS – 40 CFR 112.8 (D)

Facility transfer operations are limited to the conveyance of oil from the fill port to the associated tank. Unusual conditions, leaks, or other problems with piping and valves will be documented during visual tank inspections and immediately corrected. Fuel transfer piping servicing the ASTs is located immediately at the tank such that damage due to vehicular traffic is unlikely.

Transport personnel must have available, or have ready access to, spill response materials such as absorbent material, drain covers, and other material to limit impacts due to unforeseen events.

XXIII. SPILL RESPONSE AND EMERGENCY PROCEDURES

Spill prevention practices are ensured through the use of proper fuel loading and handling procedures, through the practice of regular maintenance and inspection of the tank and container storage systems, and through security measures, thereby minimizing the potential for a spill or release associated with petroleum storage at the facility.

Emergency spill control and response equipment must be available at readily accessible locations throughout the facility. Emergency spill control equipment may include sorbent materials (e.g., granular absorbent), oil sorbent booms, oil sorbent pads, drain covers, protective gloves, and safety glasses/goggles.

If a spill or release of oil is discovered; follow the procedure listed in Appendix 1

Emergency Contact List:

- | | | |
|----|--|--|
| A. | Drew Townsend
Director of Environmental Health and Safety | Work: 940-898-3129
Cell: 505-634-6101 |
| B. | Central Plant
Alternate Contact | 24-Hour: 940-898-3170 |

Other important numbers:

- | | | |
|----|--|--|
| a. | TWU Department of Public Safety (DPS) | 940-898-2911 |
| b. | Denton Fire Department | Emergency: 911
Non-Emergency: 940-349-8200 |
| c. | Texas Health Presbyterian Hospital
3000 N I35, Denton | Emergency: 940-898-7059
General: 940-898-7000 |
| d. | Spill Response Contractor: | Green Planet: 972-636-1515
Cell: 214-325-5343 |
| e. | State of Texas Spill-Reporting Hotline and the SERC | 800-832-8224 |
| f. | Texas Commission on Environmental Quality (TCEQ)
Region IV Fort Worth Office | 817-588-5800 |
| g. | Environmental Protection Agency (EPA)
National Response Center (NRC)
EPA Region VI - Environmental Emergencies | 800-424-8802
866-372-7745 |
| h. | City of Denton – Wastewater Treatment | 940-349-8610 |
| i. | Local Emergency Planning Committee (LEPC) | 940-349-2840 |
| j. | CHEMTREC
(CHEMical Transportation Emergency Center) | 800-424-9300 |

Regulatory Agency Reporting:

Reporting should only be completed by the Director of Environmental, Safety and Health.

Ensure the Initial Notification Form, located in Appendix 4, has been completed. The information contained in the form will be provided to the regulatory agencies as appropriate.

- Texas Commission on Environmental Quality (TCEQ)

Spills to water bodies or spills of 25 gallons or greater to land should be reported as soon as possible. If a surface oil spill is reported within 2 hours (and promptly removed) the responsible party is not subject to any fines or civil penalties.

- National Response Center (NRC) or EPA Region VI Response Center

A discharge of oil into a waterway that results in a film or sheen upon the surface of the water must be reported immediately to the NRC, also known as EPA Region VI Response Center (per 40 CFR 110.6). The following information should be available before calling:

- Name, address, and telephone number of the individual filing the report;
- Name, address, and telephone number of the facility;
- Date, time, and location of the incident;
- Type of material discharged;
- A brief description of the circumstances causing the incident;
- Description and estimated quantity by weight or volume of the materials involved;
- An assessment of any contamination of land, water, or air that has occurred due to the incident;
- Damages or injuries caused by the discharge;
- Actions taken to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be necessary; and Names of individuals or organizations that have been contacted.

- EPA Regional Administrator

Spill information must be reported to the EPA Regional Administrator within 60 days if either of the following thresholds is reached.

- Discharge more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single discharge;
- or-
- Discharge more than 42 gallons of oil in each of two discharges into or upon navigable waters of the United States or adjoining shorelines, occurring within any 12-month period.

The report is to contain the following information.

- Name of the facility;
 - Your name;
 - Location of the facility;
 - Cause of the discharge;
 - Corrective actions and/or countermeasures taken including adequate description of equipment repairs and/or replacements;
 - Maximum storage or handling capacities;
 - Description of the facility, including maps, flow diagrams, and topographical maps;
 - Additional measures taken (preventative) or contemplated to minimize the possibility of recurrence, and
 - Information the regional administrator may reasonably require pertinent to the Plan or discharge.
- City of Denton Wastewater Treatment

Contact the City of Denton as soon as possible if a significant quantity of oil is discharged to the sanitary sewer system.

TWU is responsible for all reporting and documentation procedures required under the Oil Pollution Prevention Regulations (40 CFR Part 112).

XXIV. PLAN IMPLEMENTATION – 40 CFR 112.3(A)

TWU implemented the original SPCC Plan in 2010 and has made facility improvements and purchased spill control equipment and supplies (e.g., spill kits, drain covers, dikes, mats, etc.) described in this original SPCC plan have been performed. TWU will continue to maintain this updated SPCC Plan.

FIGURES

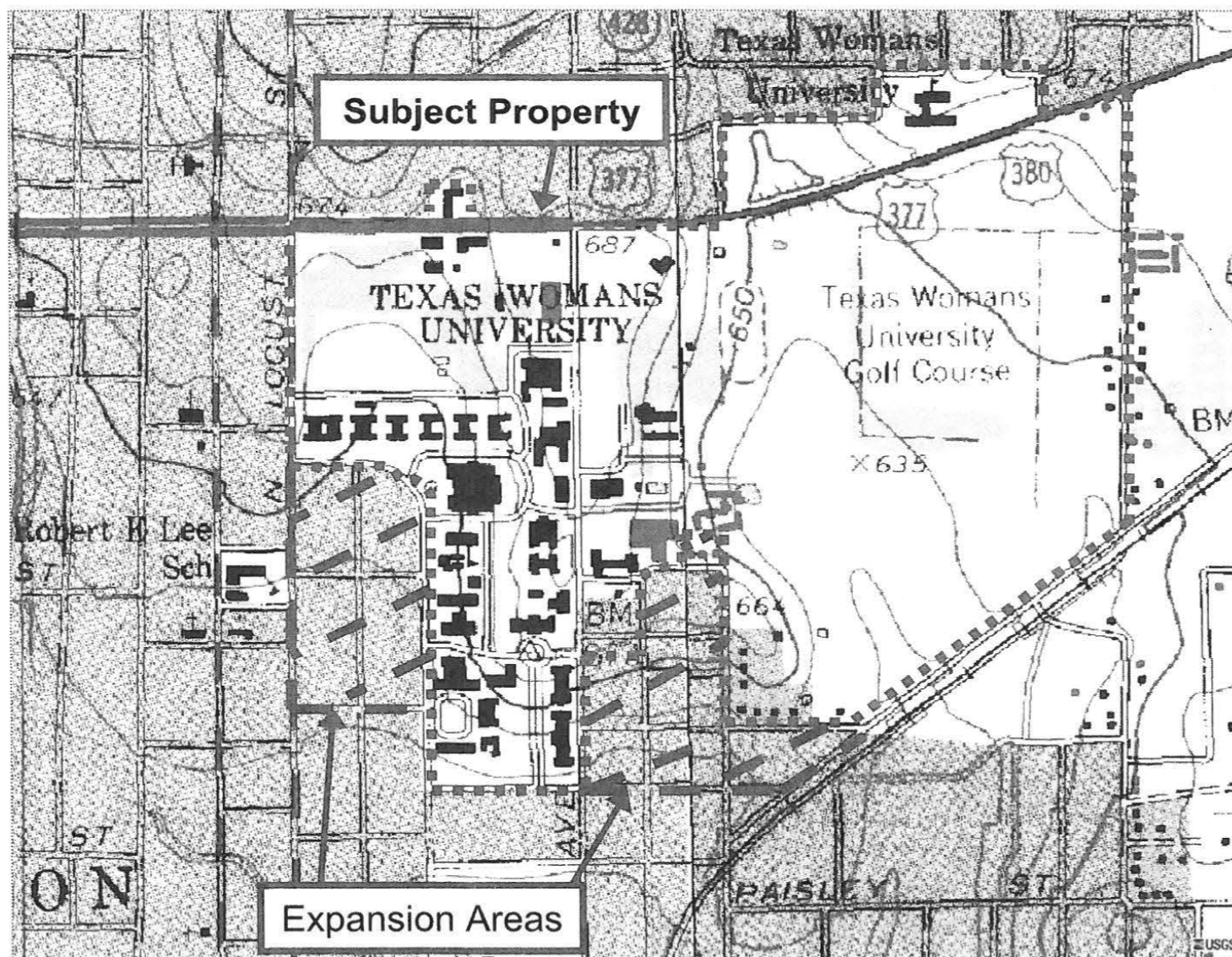
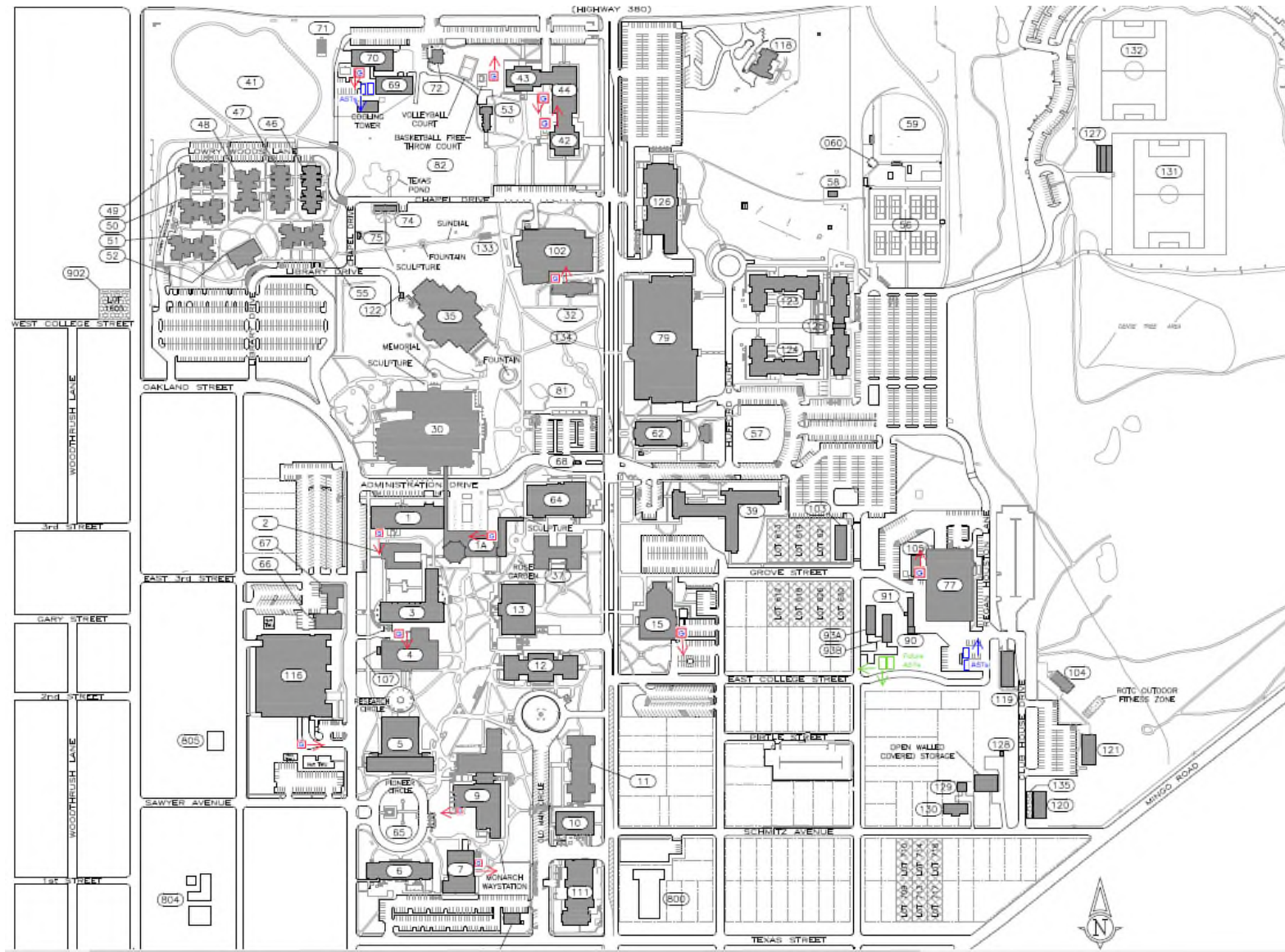


FIGURE 1
SITE VICINITY MAP

Scale: N/A EFT Project #: 98420-05139 Date: September 2009
Spill Prevention Control and Countermeasure (SPCC) Plan
U.S. Geological Society Topographic Map July 1, 1978

FIGURE 1
SITE PLAN



TABLES

TABLE 1
EMERGENCY GENERATOR LIST
Texas Woman's University
Denton, Texas

GENERATOR	ADMIN	SUPPORT ANNEX	STARK	GUINN
LOCATION	South side	Northeast side	Between Stark & Guinn	Between Stark & Guinn
SWITCH LOC.	Data center	Machine room	Machine room	Machine room
MANUFACTURER	Cummins	Cummins	Cummins	Cummins
MODEL #	DFAB-4491107	DGEA-3377508	50DGHE	50DGHE
SERIAL #	K00177669	I990982684	G030528325	G030528326
KVA RATING	287.5	156.3	62.5	62.5
KW RATING	230	125	50	50
PEAK KW USAGE	118	110	17	23.2
VOLTS	120/208	120/208	277/480	277/480
ENGINE MFG	Cummins	Cummins	Cummins	Cummins
ENGINE MODEL #	LTA10-G1	6CT8.3-G2	B3.3-G2	B3.3-G2
ENGINE SERIAL #	35023855	45886920	68014345	68014343
KEY	CH751	CH751	CH751	CH751
FUEL TANK (Gal)	550	336	140	140
FUEL USEAGE (GPH)	18.4	6.7	3.9	3.9
YEAR INSTALLED	2001	1999	2003	2003
FAILURE TYPE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE
FAILURE RATE	gradual to instantaneous	gradual to instantaneous	gradual to instantaneous	gradual to instantaneous

GENERATOR	ACT	ASSC	LIBRARY/FIT&REC	OAKLAND COMPLEX
LOCATION	Machine room	Southwest corner	NW corner of IDB	SW side of lot
SWITCH LOC.	Machine room	Machine room	Machine room	Elec Room 143
MANUFACTURER	Cummins	Cummins	Cummins	Cummins
MODEL #	80DSFAE-545611	250DQDAA	DFEG-546117	450DFEJ
SERIAL #	F090009305	F090006701	G090012989	E180363768
KVA RATING	100	312.5	438	563
KW RATING	80	250	350	450
PEAK KW USAGE	44	76.2	87.2	327
VOLTS	120/208	120/208	277/480	277/480
ENGINE MFG	Cummins	Cummins	Cummins	Cummins
ENGINE MODEL #	QSB5-G3 NR3	250DQDAA	Qsx15-G9	Qsx15
ENGINE SERIAL #	73004276		79379539	80064675
KEY	CH751	CH751	CH751	CH751
FUEL TANK (Gal)	140	500	600	850
FUEL USEAGE (GPH)	6.9	17.3	24.1	30.1
YEAR INSTALLED	2009	2009	2010	2018
FAILURE TYPE	CF, PL, PM, OF, SE		CF, PL, PM, OF, SE	CF, PL, PM, OF, SE
FAILURE RATE	gradual to instantaneous		gradual to instantaneous	gradual to instantaneous

GENERATOR	GRB	MCL	FMC	POWER PLANT
LOCATION	North side	East side	West side	Southwest corner
SWITCH LOC.	Machine room	Machine room	North wall	Northeast corner
MANUFACTURER	Cummins	Cummins	Cummins	Katolight
MODEL #	125DSGAB	60DSFAD	150DSGAC	D600FRZ4
SERIAL #	G100142563	G100142569	F080191078	WA525336
KVA RATING	156	75	188	287.5
KW RATING	125	60	150	230
PEAK KW USAGE	46	10.6	68	133
VOLTS	277/480	277/480	120/208	277/480
ENGINE MFG	Cummins	Cummins	Cummins	Cummins
ENGINE MODEL #	QSB7-G3 NR3	QSB5-G3 NR3	QSB7-G3 NR3	VTA28-G5
ENGINE SERIAL #			46900009	25262341
KEY			CH751	CH545
FUEL TANK (Gal)	309	140	308	1,320
FUEL USEAGE (GPH)	10	5.7	12.25	17.8
YEAR INSTALLED	2010	2010	2009	2000
FAILURE TYPE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE	CF, PL, PM, OF, SE
FAILURE RATE	gradual to instantaneous	gradual to instantaneous	gradual to instantaneous	gradual to instantaneous

CF - corrosion failure

PL - piping leak

SE - spill event

OF - overfill

PM - pump malfunction

HF - hydraulic failure

TABLE 2
OIL-FILLED TRANSFORMER LIST
Texas Woman's University
Denton, Texas

Site Designation	Building Served	Kva Capacity	Gallons	Failure Type	Failure Rate	PCB
T-11	Steam Plant	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-21	Little Chapel	50	82	CF, PL, PM, OF	gradual to instantaneous	N
T-31	University House	75	120	CF, PL, PM, OF	gradual to instantaneous	N
T-41	Guinn Hall	1500	390	CF, PL, PM, OF	gradual to instantaneous	N
T-42	Stark Hall	1500	390	CF, PL, PM, OF	gradual to instantaneous	N
T-73	IDB Building	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-74	Fitness Center	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-81	Concessions Building	50	82	CF, PL, PM, OF	gradual to instantaneous	N
T-82	Tennis Courts	225	160	CF, PL, PM, OF	gradual to instantaneous	N
T-91	Soccer Field (old)	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-101	Pioneer Hall	1500	390	CF, PL, PM, OF	gradual to instantaneous	N
T-111	DGL Building	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-112	Amphitheater	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-121	Student Center	750	270	CF, PL, PM, OF	gradual to instantaneous	N
T-131	Stoddard Hall	225	160	CF, PL, PM, OF	gradual to instantaneous	N
T-135A	Mary Jones Hall	225	160	CF, PL, PM, OF	gradual to instantaneous	N
T-136A	Brackenridge Hall	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-141	MCL Building	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-142	CFO Building	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-151	Old Main	225	125	CF, PL, PM, OF	gradual to instantaneous	N
T-152	Woodcock Hall	225	137	CF, PL, PM, OF	gradual to instantaneous	N
T-161	Ann Stuart Science Complex (ASSC)	750	405	CF, PL, PM, OF	gradual to instantaneous	N
T-162	Support Annex	112.5	125	CF, PL, PM, OF	gradual to instantaneous	N
T-171	ULB Building	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-181	Fine Arts	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-191	Margo Jones	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-192	Music Building	150	130	CF, PL, PM, OF	gradual to instantaneous	N
T-201	ASB Building	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-202	GRB Building	750	270	CF, PL, PM, OF	gradual to instantaneous	N
T-212	Patio Building	75	120	CF, PL, PM, OF	gradual to instantaneous	N
T-221	Admissions Building	225	160	CF, PL, PM, OF	gradual to instantaneous	N
T-241	Chiller Plant	5000	970	CF, PL, PM, OF	gradual to instantaneous	N

T-242	Lowry Woods Spare	1000	320 or 350	CF, PL, PM, OF	gradual to instantaneous	N
T-250	Lowry Woods	1000	320 or 350	CF, PL, PM, OF	gradual to instantaneous	N
T-251	Lowry Woods- Sayers	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-252	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-253	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-254	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-255	Lowry Woods	167	162	CF, PL, PM, OF	gradual to instantaneous	N
T-256	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-257	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-258	Lowry Woods	250	162	CF, PL, PM, OF	gradual to instantaneous	N
T-259	Lowry Woods Spare	250	162	CF, PL, PM, OF	gradual to instantaneous	N
	Soccer Field New	500	200	CF, PL, PM, OF	gradual to instantaneous	N
T-T05	Parliament Village- North Hall	1500	479	CF, PL, PM, OF	gradual to instantaneous	N
T-T04	Parliament Village- South Hall	1500	479	CF, PL, PM, OF	gradual to instantaneous	N
T-T03	Parliament Village- Mary's Hall	1500	479	CF, PL, PM, OF	gradual to instantaneous	N
T-T02	Dining Hall	1000	320 or 350	CF, PL, PM, OF	gradual to instantaneous	N
T-T01	Parking garage	500	200	CF, PL, PM, OF	gradual to instantaneous	N

Total: 10051

CF - corrosion failure

OF - overfill

PL - piping leak

PM - pump malfunction

SE - spill event

HF - hydraulic failure

T-T is temporary assigned number

Hubbard hall has 3 transformers (T-222, T-222A, T-223) which are the “Dry, Breaker” type; no oil to leak

TABLE 3
HYDRAULIC ELEVATOR LIST
Texas Woman's University
Denton, Texas

Bldg. #	Building Name	Install/Mod Date	Failure type	Rate	
44	Stark Guinn Commons	2000	PM, OF, HF	gradual to instantaneous	
79	Pioneer Hall	1997	PM, OF, HF	gradual to instantaneous	
30	Hubbard Hall	2002	PM, OF, HF	gradual to instantaneous	
37	Stoddard	2000	PM, OF, HF	gradual to instantaneous	
37	Stoddard	2000	PM, OF, HF	gradual to instantaneous	
35	Library	2000	PM, OF, HF	gradual to instantaneous	
35	Library	2000	PM, OF, HF	gradual to instantaneous	
39	Jones Hall	2000	PM, OF, HF	gradual to instantaneous	
64	Student Center	2004	PM, OF, HF	gradual to instantaneous	
64	Student Center	2004	PM, OF, HF	gradual to instantaneous	
4	G R B	2000	PM, OF, HF	gradual to instantaneous	
62	D G L	2000	PM, OF, HF	gradual to instantaneous	
3	A S B	2003	PM, OF, HF	gradual to instantaneous	
5	Margo Jones Hall	2000	PM, OF, HF	gradual to instantaneous	
6	Fine Arts	2004	PM, OF, HF	gradual to instantaneous	
12	Old Main	1993	PM, OF, HF	gradual to instantaneous	
11	Woodcock Hall	2000	PM, OF, HF	gradual to instantaneous	
9	ASSC (south)	2011	PM, OF, HF	gradual to instantaneous	
9	ASSC (north)	2010	PM, OF, HF	gradual to instantaneous	
102	Fitness & Recreation	2011	PM, OF, HF	gradual to instantaneous	
123	Parliament Village- North Hall	2019	PM, OF, HF	gradual to instantaneous	124 gal
124	Parliament Village- South Hall	2019	PM, OF, HF	gradual to instantaneous	124 gal
125	Parliament Village- Mary's Hall	2019	PM, OF, HF	gradual to instantaneous	124 gal
116	Parking Garage	2018	PM, OF, HF	gradual to instantaneous	
116	Parking Garage	2018	PM, OF, HF	gradual to instantaneous	

CF - corrosion failure OF - overfill
 PL - piping leak PM - pump malfunction
 SE - spill event HF - hydraulic failure

SRC has a traction elevator
 HH does not have a drain in elevator room

TABLE 4
MISCELLANEOUS OIL-CONTAINING EQUIPMENT LIST
Texas Woman's University
Denton, Texas

Type of Container	Location	Date Installed	Contents/Capacity (gallons)	Tank/Pipe Material	Secondary Containment	Failure Type	Rate	Flow Direction
AST1	Central Plant	2001	diesel/15,000	steel/steel	double wall	CF, PL, PM, OF	gradual to instantaneous	To ground then to south
AST2	Central Plant	2001	diesel/15,000	steel/steel	double wall	CF, PL, PM, OF	gradual to instantaneous	To ground then to south
AST3	Facilities Service Center	2021	diesel/1,000	steel/steel	open; steel	CF, PL, PM, OF	gradual to instantaneous	To concrete then to north towards FMC
AST4	Facilities Service Center	2021	gasoline/1,000	steel/steel	open; steel	CF, PL, PM, OF	gradual to instantaneous	To concrete then to north towards FMC
Used oil container	Central Plant	NA	used oil/55	steel/NA	double wall	CF, PL, PM, OF	gradual to instantaneous	To ground then to south
Sand Trap	Facilities Service Center	unkn	1000	concrete/NA	NA	OF, SE	NA	NA
Oil Water Separator	Facilities Service Center	unkn	1000	concrete/NA	NA	OF, SE	NA	NA
Grease Trap	Hubbard	2019	10,000	concrete/NA	NA	OF, SE	NA	NA
Grease Trap	Dining Hall	2019	5,000	concrete/NA	NA	OF, SE	NA	NA

Grease Trap	Oakland Complex	2019	500	concrete/NA	NA	OF, SE	NA	NA
Oil Water Separator/Grit Trap- Elevator	Oakland Complex	2019	150	concrete/NA	NA	OF, SE	NA	NA
Used Cooking Oil Container	Hubbard	2019	100	unkn	NA	SE, OF	gradual to instantaneous	NA indoors
Used Cooking Oil Container	Dining Hall	2019	100	unkn	NA	SE, OF	gradual to instantaneous	NA indoors
New Cooking Oil Container	Hubbard	2019	100	unkn	NA	SE, OF	gradual to instantaneous	NA indoors
New Cooking Oil Container	Dining Hall	2019	100	unkn	NA	SE, OF	gradual to instantaneous	NA indoors
55-gallon Drum	Facilities Service Center	NA	used oil/various quantities	steel/NA	Drum pallet	SE, OF	gradual to instantaneous	Contained within drum pallet. If spilled inside building prior to placement on pallet, would flow to OWS.
55-gallon Drum	faculties Service Center	NA	new oil/various quantities	steel/NA	Drum pallet	SE, OF	gradual to instantaneous	Contained within drum pallet. If spilled inside building prior to placement on pallet, would flow to OWS.
Used oil container	Facilities Service Center	NA	approximately 500	steel/NA	double wall	CF, PL, PM, OF	gradual to instantaneous	To concrete inside building
Truck-mounted AST	Auto Shop at Facilities Service Center	unkn	diesel/100	steel/poly flex	None	OF, SE, PL, PM	gradual to instantaneous	To pavement then adjacent soil

CF - corrosion failure
PL - piping leak
SE - spill event

OF - overfill
PM - pump malfunction
HF - hydraulic failure

unkn - unknown
NA - not applicable
OWS - oil water separator

Δ **Need drain block for floor drains**

TABLE 5
SPILL HISTORY
Texas Woman's University
Denton, Texas

Written Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence
10/13/09 ~2PM: One of the TWU busses was just refueled and parked on the hill to the south of the Auto Shop. Auto shop personnel subsequently noticed oil sheen spreading across the parking lot around both sides of the fuel island and tracked it back to the bus. It appears that a small amount of diesel fuel leaked from around the fuel filler cap and that the fuel tank may have been overfilled and leaked out when parked on the slope.	FMC auto shop personnel used absorbent pads, socks and granular absorbent to soak up the sheen across the paved area. The rainwater was running south and north from the auto shop area, and small quantities of sheen or sludge appears to have reached the grass areas where this water discharges from the paved areas. All absorbent materials were swept up as much as possible and placed in a 55-gallon drum along with PPE for proper disposal.	Auto Shop personnel to check to make sure there is no issue with the fuel tank on the bus and instruct personnel not to over fill the fuel tank when refueling.
11/09/09 ~10PM: DPS notified the FMC Auto Shop of an incident involving thefts of items from cars parked in the Pioneer Hall parking lot which was discovered the morning of Monday, November 9th. DPS estimated that the thefts occurred at approximately 10 PM, Sunday night November 10. The thieves also tried to siphon gas from at least one of the vehicles, resulting in spillage in the relatively flat area of the lot between the last two rows of cars. When found, the fuel was mixed with rain water, and there was a strong odor of gasoline in the areas as it evaporated. Matt Moustakas inspected the area and found no evidence that the spill had migrated off of the pavement, and there are no storm drains in the area.	The FMC auto shop responded by obtaining granular absorbent, brooms, shovels and a waste container. The granular absorbent was used to absorb all of the gasoline/stormwater mixture and placed in a drum of used absorbent in the auto shop from the previous incident for proper disposal during the next waste disposal event.	None.
08/02/11: Time unknown; FMC was notified that one of the grease traps in the loading dock areas south of the Student Union had backed up at some point in the last couple of days. An unknown small quantity of grease/water had discharged to the concrete loading dock drive, and some portion of the liquid had reached the adjacent trench drain, and vehicles had begun to track the material.	There was no flowing liquid by the time FMC personnel arrived on scene, only residual materials on the concrete. FMC personnel capped off the discharge pipe from the trench drain, placed a sump pump in the trench drain that was arranged to discharge to the nearby sanitary sewer cleanout, and then proceeded to power wash the concrete with detergent and water. The City of Denton was notified of the cleanup approach prior to commencing the discharge to the sanitary sewer.	None

Written Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence
08/27/11: 7:30 pm; TWU housing personnel were notified of a car with a leaking gas tank in the Guinn Hall Parking lot. TWU DPS was summoned who in turn summoned the Denton Fire Department.	The Denton Fire Department used granular absorbent on the gasoline leak (estimated at a few gallons), and took the resulting material with them for disposal. The car was impounded by TWU DPS. Matt Moustakas was not notified until 9/7/11 and will be notified by DPS of any leaks or spills going forward.	None
2/29/12: The custodians working in the student union notified their supervisors that there were significant quantities of kitchen grease spilled around the kitchen grease collection tank outside the student union loading dock. It appears that some of the buckets used to transfer grease from the kitchens to this tank had spilled and/or some material had been spilled over time when transferring the buckets contents.	The TWU employee responsible for food services as well as the Aramark (food service contractor) contact were notified and the area was cleaned.	Aramark employees were reminded of proper grease handling procedures.
3/14/12 4:30 PM; A visitor to the campus was cutting through the grass area between the MCL parking lot and parking lot north of Jones Hall with his motorcycle. He rolled over the curb and damaged the oil pan on the bottom of the motorcycle and did not realize it. He proceeded to drive out of the parking lot and east along administration drive until he stopped in the parking lot south of Jones Hall once he realized the motorcycle was leaking. The majority of the trail of oil was a very small/thin layer due to the speed of the motorcycle and the size of the leak. The heavier puddles of oil were on either end of the trail.	Auto Shop Supervisor and Matt Moustakas used absorbent pads to recover as much of the oil from the heavier areas as possible, but a large stain remained.	None
11/20/12: FMC landscaping employee reported an automotive oil leak which appears to have occurred over night as the oil had run downhill several spaces east and what appeared to be sprinkler water was mixed with the oil.	The car that lost the oil appeared to have been moved prior to reporting of the spill. Eric Hutmacher (Safety Officer) notified DPS in an attempt to locate the owner of a car parked over part of the oils spill. Two automotive shop employees and two Risk Management employees used absorbent spill pads to absorb the free liquids followed by oil-dri to absorb the residual oil, including under the parked car. Resulting materials were disposed of in the normal trash as there were no free liquids in the resulting waste.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.

Written Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence
7/11/13: Hydraulic leak from crane being used by roofing contractor. Leaked hydraulic fluid was contained by concrete sidewalk and road with the exception of a small amount that appears to have entered the grass to the side of the sidewalk.	Roofing contractor cleaned up the hydraulic oil with granular absorbent.	Encourage contractors to ensure proper maintenance is conducted on their equipment and to immediately report spills to TWU Construction Observer.
8/27/2013: Received a call from a TWU student that a scooter was on its side leaking gas and oil.	Scooter was actually off campus, but Risk Management employee responded and soaked up gas and oil and disposed of the resulting material in the auto shop absorbent disposal drum.	N/A: Not on TWU property.
7/5/14: During normal patrol, TWU DPS found a car that had been involved in an accident the evening before that was now parked in the Lowry Woods parking lot and was leaking transmission fluid.	DPS contacted Risk Management and Matt Moustakas responded. Transmission fluid was absorbed using spill pads as well as possible. Some fluid escaped the concrete lot via the expansion cracks. Response materials disposed of in normal trash as there were no free liquids.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
7/12/14: During a normal patrol, TWU DPS discovered a car which had been involved in an accident the evening before that was now parked in the Lowry Woods parking lot and was leaking oil.	DPS contacted Risk Management. Oil was soaked up with absorbent pads as best as possible. Some of the fluid escaped the concrete parking lot via the expansion cracks in the lot. Response materials disposed of in normal trash as there were no free liquids.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
1/15/15: TWU DPS contacted Risk Management to report that a student was working on her car and had allowed fluid to leak onto the ground. Upon arrival it was noted there was a small amount of oil that had leaked from her car when she tried to add new oil.	Soaked up transmission fluid with absorbent pads as best as possible. Response materials disposed of in normal trash as there were no free liquids.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
6/19/15: TWU EHS Coordinator & the Student Union Director independently contacted Director of EH&S to report grease and water overflowing from the grease separator manhole covers behind the Student Union. The water and some grease flowed across the concrete downhill away from the dock (south) towards a storm water drain.	FMC plumbers responded, unclogging the line flowing out of the separator (which is a recurring problem). EHS staff cleaned the grease from the pavement and used oil sops to try and filter grease from the water flowing to the drain. Aramark was contacted to summon the grease contractor to pump the separator out as a precaution.	Discuss the possibility of installing an improved cleanout to allow better PM on this system in the hopes that the number of clogs occurring will be reduced. Update: A month later, FMC came back to cut the concrete and install a better cleanout on the outflow side to help prevent future clogs.
8/4/15: A TWU bus was leaking motor oil in the parking lot.	FMC Auto Shop staff cleaned the stain with absorbent and placed a drip pan under it until they could get it fixed.	Discussed BPMs with FMC Auto Shop staff.
9/2/15: During monthly Visual Stormwater Contamination Assessments, grease was observed leaking from a dumpster behind the Student Union. Employees of Aramark had disposed of grease in the dumpster, which leaked out the bottom.	Aramark was notified to stop putting grease in the dumpster. The area was cleaned by Aramark employees.	Aramark management reminded employees to not throw grease in the trash.

Written Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence
9/25/15: TWU DPS reported a vehicle leaking transmission fluid on Administration Drive.	EH&S staff placed absorbent pads under the leak and used oil absorbent to clean up the stained area. The vehicle was towed away.	
11/23/15: A student hit debris on the way to school, poking a small hole in the gas tank. The vehicle, in the commuter lot south of Marketing, was leaking gasoline on the pavement surface. The office of EH&S was contacted by TWU DPS.	DPS cordoned off the area while stained surfaces and pooled fuel were cleaned. Absorbent materials were used to collect spilled fuel. A drip pan was placed under the vehicle until the fuel sopped leaking out. The vehicle was towed off TWU property at 1300 hours on 11-23-15. The used absorbent material was placed in the 180-day Haz storage area until the material was properly disposed of under waste manifest documentation. Approximately 2.5 gallons was released from the vehicles tank.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
7/02/16: It appears that a visitor to Lowry Woods apartment complex had a leak in the oil pan of their car. While most of the oil was found where the car was parked, there was a small line of oil visible from the Lowry parking lot, out to Little Chapel Road, and in the northbound lane of Bell Ave to at least Administration drive. The office of EH&S was contacted by TWU DPS.	TWU DPS secured the area until EH&S staff arrived. Absorbent materials were used to collect spilled oil. Pads were placed under the vehicle to catch additional drips. The vehicle was removed at some point after EH&S and DPS left the scene. The used absorbent material was placed in the 180-day Haz storage area until properly disposed of under waste manifest documentation.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
4/8/17: Landscaping crew was working in the area, and the fuel container was sitting on the curb, and it tipped over.	DPS secured the area until EH&S staff arrived. Granular absorbent materials were used to collect spilled oil and gas. Waste absorbent was disposed of properly, as regulated/used oil waste. Also, supervisors were instructed to equip Gators with spill materials.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible. Have Gators equipped with spill materials.
9/18/17: Ground worker was mowing the soccer field on the north end close to the fence. He noticed that one of the hydraulic lines had burst.	Upon contact about the incident, EH&S brought absorbent materials under the area leaking (the rear of the mower). Once the mower was moved, impacted soil was excavated, containerized and properly disposed.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
9/20/17: TWU employees were using a backhoe to compress trash in a roll off dumpster. A hydraulic leak occurred in the backhoe causing hydraulic fluid to be discharged onto the parking lot behind the library.	Absorbent material was used to soak up all spilled materials. The used absorbent was then containerized and disposed of.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
3/4/18: DPS was patrolling the Lowry Woods parking lot and observed oil leaking from a car.	The car was removed from the lot, and absorbent material was used to soak up the oil. The absorbent was properly disposed.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
1/11/19: A vehicle leaked gasoline/diesel into the street in the area in front of what used to be DPS that is part of Hubbard Hall.	Hope Zavalin cleaned the area with absorbent material, which was then properly disposed.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.

Written Description of Spill	Corrective Actions Taken	Plan for Preventing Recurrence
1/17/19: A hydraulic lift leaked hydraulic fluid onto the drive behind the Old Main Building (between the Old Main Building and the Classroom Faculty Offices Building).	The contractor was required to clean the hydraulic fluid and properly dispose of the material.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
1/18/19: A radiator was leaking antifreeze in the handicap parking lot in front of Gwen and Stark.	Drew Townsend cleaned the area with absorbent material, which was then properly disposed.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
3/14/19: Someone changed their oil in the Guinn parking lot and left the oil pan full of oil, some of which had leaked onto the concrete.	Hope Zavalin cleaned the area with absorbent material, which was then properly disposed. The oil in the pan was transferred to a bucket and then transferred to Facility Management's used oil container.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
7/26/19: Improperly disposed cooking oil crushed in the dump truck leaked onto the concrete by the auto shop.	Auto shop personnel cleaned and properly disposed of the spilled material.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
8/5/19: A dump truck leaked hydraulic fluid on the north side of the Old Main Building and on part of Bell Ave.	The contractor was required to clean the hydraulic fluid and properly dispose of the material. Risk Management did assist with a portion of the cleanup and provided some spill response materials.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
2/21/20: A car which had a wreck near Stark & Guinn pulled into the Stark parking lot off of Bell Ave. Some antifreeze leaked out.	Drew Townsend & Hope Zavalin cleaned the area with absorbent material, which was then properly disposed.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible.
2/15/21: Both the Stark and Guinn generators had a broken diesel line due to cold temperatures causing the diesel to gel. ~ 10 gallons of diesel leaked between the two generators. None made it to drains.	Drew Townsend shoveled contaminated snow into drums, placed absorbent down, placed absorbent socks around the drains, and covered the north drain with a flexible mat. Emergency response contractors were then contacted to perform additional cleanup.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible. Diesel additive is being added to the generators as a preventative measure to prevent gel.
2-16-21: The SRC generator leaked ~2 gallons of coolant onto the loading dock area.	Emergency response contractors performed cleanup.	Encourage all employees to report spills of any kind to DPS and Risk Management as soon as possible. Also created a plan with the Auto Shop to have their employees tighten hoses on emergency generators when we are expected to have extremely cold temperatures.

TABLE 6
SPILL PREVENTION EQUIPMENT
Texas Woman's University
Denton, Texas

Equipment	Overfill Protection	Spill Kit Location
AST 1 & 2;	Veeder-Root ATG systems	Spill kits (sorbent, pads, etc.) to be maintained in the Central Plant and FMC Service Center ⁽¹⁾
AST 3 & 4	Sight gauge on tank	Spill kits (sorbent, pads, etc.) to be maintained in the Central Plant and FMC Service Center ⁽¹⁾
Cooking Grease	Alarm	Spill kits (sorbent, pads, etc.) to be maintained in the vicinity of kitchen areas ⁽¹⁾
Generator ASTs	Sight gauge on tank	Provide appropriate drain covers for and a small spill kit to be maintained on the truck used to refill the generator ASTs ⁽¹⁾
Used oil AST, FMC Golf Cart Barn	Sight gauge on tank	Spill kit (sorbent, pads, etc.) to be maintained in the adjacent FMC Service Center ⁽¹⁾
Used oil AST, Central Plant	Visual inspection during filling	Spill kit (sorbent, pads, etc.) to be maintained in the Central Plant ⁽¹⁾
(1) Spill response supplies shall be located in a location readily accessible during fueling events and to allow access during spill events.		

Appendix I

Procedures

- Ensure the Initial Notification Form, located in Appendix 3, has been completed for each incident. The information contained in the form will be provided to the regulatory agencies as necessary.

Texas Woman's University Oil Transfer Procedure

General:

1. Keep fire away and prevent persons from smoking.
2. Park vehicle as close as possible to the fill pipe or tank receiving the product and use the minimum length of hose possible to complete the connection between the vehicle and the tank or fill pipe.
3. Verify that the temporary spill containment structures (e.g., drain covers or plugs) are available nearby; covers/plugs will generally be put in place if a spill occurs. Verify that the emergency spill containment equipment (e.g. absorbent pads, granular absorbent, oil boom, etc.) is fully stocked at a nearby accessible location prior to beginning transfer operations. The truck used to fuel generator tanks should also be equipped with some emergency spill response and containment equipment (e.g., absorbent pads/socks).
4. The driver and designated TWU employee shall remain at the fill location at all times and shall not leave the vehicle unattended during the transfer operations.

Prior to Transfer:

1. Visually check all transfer hoses for leaks and wet spots. Only use hoses in good condition.
2. Verify that sufficient volume is available in the storage tank to receive the product to be pumped. Determine tank capacity by level indicator, electronic inventory system, or taped measurement and tank gauge chart.
3. Secure the loading vehicle prior to transfer operations with physical barriers such as wheel chocks to safeguard against accidental movement and rupture of transfer lines. Make sure that the parking brakes of the loading vehicle are set.
4. Keep hose ends tightly capped while moving hoses into position.

During Transfer:

1. When transferring liquids, shut off motors or auxiliary or portable pumps when making and breaking hoseconnections.
2. Monitor all hoses and hose couplings for leaks. Prevent personnel or vehicular contact with hoses through the use of barricades or orange traffic cones as necessary.
3. Monitor the liquid level in the receiving tank during filling operations to prevent overflow.
4. Do not top off tank. Provide a minimum of 10 percent free space within the tank to prevent leakage due to thermal expansion. Close valve connections if an overfill condition occurs and withdraw sufficient liquid from the tank, if possible, to permit complete drainage of the vent pipe and hose fill.

After Transfer:

1. Close all tank and loading valves before disconnecting.
 2. Securely close all vehicle internal, external, and dome cover valves before disconnecting.
 3. Make sure that all material transfer operations are complete before disconnecting any transfer lines.
 4. Secure all hatches.
 5. Remove any wheel chocks that have been used.
 6. Prior to vehicle departure make sure that all connections, and fill lines are disconnected.
-

7. After the transfer lines are disconnected and prior to vehicle departure, inspect the outlets for evidence of leakage.
 8. Make sure that the hoses or other connecting devices are drained, vented, or blown down to remove the remaining liquid before moving them away from their connections.
 9. Use a drip pan, pail, and/or oil absorbent pads when breaking a hose connection.
 10. Cap the end of the hose or other connecting devices before moving them to prevent uncontrolled oil leakage.
 11. Cap associated hose risers.
 12. Close all hose riser valves not in use.
 13. Soak up any spilled or dripped oil from in or around the fill port and secure the fill port cover or cap.
 14. If any oil-containing sorbent material was generated during fuel transfer operations, contacting Risk Management/Director of Environmental Health and Safety for proper disposal.
-

Texas Woman's University General Handling Oil Procedures

HOUSEKEEPING

It is the responsibility of TWU employees to keep their work area clean at all times. The following procedures will assist in meeting this responsibility.

1. Spills, no matter how small or insignificant, should be cleaned up immediately in accordance with proper procedures.
2. Sorbent materials shall be properly disposed of in accordance with proper procedure and only by licensed vendors. Contact Risk Management/Director of Environmental Health and Safety for proper disposal.
3. Immediately report large spills/leaks in accordance with the emergency spill response protocol in this plan (See Oil Spill Response Procedure above).

LEAK DETECTION RESPONSE

In the event a leak detection alarm is activated:

1. If a leak detection alarm is found activated, notify the department responsible for the associated oil-containing equipment and the Director of Environmental Health and Safety immediately.
 2. If a leak is discovered which is not being contained by a double wall system, respond in accordance with the emergency spill response procedure above.
 3. If a significant leak is not apparent, inspect the piping and connections to determine if there are any leaks. If evidence of a leak is discovered, respond in accordance with the emergency spill response procedure above.
 4. If no visible leak is located, contact FMC who will contact a State Certified vendor to inspect the system and clear the alarm, or perform necessary repairs.
-

Appendix 2

Statement of Substantial Harm Determination

Certification of the Inapplicability of the Substantial Harm Criteria
(Attachment C-II to 40 CFR 112 Appendix C)

Facility Name: Texas Woman's University

Facility Address: Denton, Texas

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 oil 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 in Attachment C-III to Appendix C, 40 CFR 112, or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR 112, Section 10, for availability) and the applicable Area Contingency Plan.

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 in Attachment C-III to Appendix C, 40 CFR 112, or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake¹?

Yes ☐ No ☒

¹ For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

Certification of the Inapplicability of the Substantial Harm Criteria (Continued)

Facility Name: Texas Woman's University

Facility Address: Denton, Texas

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

Drew Townsend

Name (type or print)

Director of Environmental, Safety & Health

Title

Date

Appendix 3

Initial Notification Form

HAZARDOUS MATERIALS INCIDENT

INITIAL NOTIFICATION - Federal Law Requires Information in Shaded Areas

1	Date of Incident:	Time of Incident: <input type="checkbox"/> AM <input type="checkbox"/> PM	
2	Company Name:		
3	Location (street, route, town, county):		
4	Person Reporting:	Number Calling From:	
5	Call Back Name:	Call Back Number:	
6	Type of Incident: <input type="checkbox"/> Spilling <input type="checkbox"/> Leaking <input type="checkbox"/> Pumping <input type="checkbox"/> Pouring <input type="checkbox"/> Emitting <input type="checkbox"/> Discharging		
7	Substance: <input type="checkbox"/> EHS	Trade Name:	
	DOT ID: _____ Hazard Class: _____	CAS Number: _____-____-____	
8	Physical State Stored: <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	State Released: <input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas	
	Qty. Released: _____ <input type="checkbox"/> lbs <input type="checkbox"/> gal <input type="checkbox"/> ft ³	Reportable Quantity: _____ lbs	
9	Container (check all that apply):	Capacity: _____ <input type="checkbox"/> lbs <input type="checkbox"/> gal <input type="checkbox"/> ft ³	
	<input type="checkbox"/> Fixed <input type="checkbox"/> Mobile <input type="checkbox"/> Portable <input type="checkbox"/> Insulated <input type="checkbox"/> Pressurized <input type="checkbox"/> Armored <input type="checkbox"/> Steel <input type="checkbox"/> Glass <input type="checkbox"/> Plastic <input type="checkbox"/> Tank <input type="checkbox"/> Box <input type="checkbox"/> Barrel <input type="checkbox"/> Pipe <input type="checkbox"/> Other:		
10	Release: <input type="checkbox"/> Complete <input type="checkbox"/> Ongoing <input type="checkbox"/> Confined	Duration:	Rate:
11	Released to: <input type="checkbox"/> Soil <input type="checkbox"/> Water <input type="checkbox"/> Ocean <input type="checkbox"/> Air <input type="checkbox"/> Well <input type="checkbox"/> Sewer <input type="checkbox"/> Containment <input type="checkbox"/> Other:		
12	Wind Direction: _____ MPH:	Weather Conditions: _____ Temp: _____	
13	Assistance Needed: <input type="checkbox"/> Police <input type="checkbox"/> Fire <input type="checkbox"/> Ambulance <input type="checkbox"/> HazMat Team <input type="checkbox"/> Other:		
14	Health Effects/Emergency Care Instructions (if known) <input type="checkbox"/> Injuries <input type="checkbox"/> Fatalities		
15	Description of Incident:		
16	Preventative Measures:		
16	IMPORTANT NUMBERS TO CALL: <input type="checkbox"/> Fire Department, State Police, Emergency Response Team (911) <input type="checkbox"/> Texas Spill-Reporting Hotline (817-588-5800) <input type="checkbox"/> National Response Center (800-424-8002) Incident Number: _____ <input type="checkbox"/> Spill Response Contractors <input type="checkbox"/> Corporate Environmental Department		
17	Notification Date: _____ Time: _____	Received by: _____	

Appendix 4

SPCC Training Outline

SPCC Training Outline
Texas Woman's University
Denton, Texas

Applicable Regulations

- 40 CFR 112 – Oil Pollution Prevention (adopted by Texas without additions)
 - Requires facilities storing petroleum products in quantities greater than 1,320 gallons above ground or 42,000 underground to develop a Spill Prevention, Control and Countermeasures plan
 - Plans must include:
 - Detail of each container;
 - Discharge prevention measures – procedural
 - Discharge prevention measures – structural
 - Discharge response measures
 - Inspections
 - Training activities

Proper Operation of Equipment

- Housekeeping
- Routine inspections

Operations, Policies and Procedures

- Tank loading
- Spill equipment location and use

Emergency Procedures

- Spill response
- Spill reporting

Known Spills

Appendix 5

Monthly AST Inspection Checklist

AST Monthly Inspection Form

General Inspection Information:

Inspection Date: _____ (Retain inspection record for at least 36 months from inspection date)
Inspector Name: _____ *Signature:* _____ *Department:* _____
Tank/Container/Generator Inspected: _____

Inspection Guidance:

- Who can perform inspections? This periodic inspection covers easily observable condition of bulk storage tanks/containers, oil-filled operational equipment, and containment structures. *It does not require a certified inspector and may be performed by any trained person who knows the site and can identify changes and developing problems.*
- Where available/applicable, follow the manufacturer recommended inspection/testing schedules and procedures.
- Upon discovery of water in the primary tank/container, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Before discharge to the environment, inspect water for oil or other regulated products and disposed of it properly. Contact EHS for assistance.
- Non-conforming items important to tank/container or containment integrity may require evaluation by an experienced engineer, inspector, or manufacturer representative to determine the corrective action. Note non-conformances and corrective actions in the comment section.
- Submit completed checklists and retain them for 36 months.
- A YES indicates a non-conformance requiring action to address an observed problem. Whenever possible, immediately correct an observed problem.

Item		Status		Comments (Include tank/container number(s) and describe the deficiencies.)
		Yes	No	
1	Primary & Secondary Containment			
1.1	Noticeable distortions, buckling, denting, bulging, rust, loss of coating or other physical deterioration of primary container?			

1.2	Tanks/ containers improperly positioned or stored?			
1.3	Water in primary container, secondary containment, interstice, or spill container?			
1.4	Secondary containment dikes, walls, moats or curbs not in good condition?			
1.5	Debris or fire hazard in containment?			
1.6	Drain valves inoperable or found in the open position?			
2	Leak Detection			
2.1	Visible signs of leakage from or around the 1. tank or container, 2. support pad or foundation, 3. secondary containment, 4. surrounding storage area or ground or 5. interstice?			
3	Tank Equipment, Attachments and Appurtenances			
3.1	Liquid level gauge (if present) unreadable or in poor condition?			
3.2	Any tank / container valves or openings improperly sealed?			
3.3	Any aboveground valves, piping, or appurtenances in poor condition?			
3.4	Spill containment box on fill pipe filled with debris or water or overfill alarm or valve inoperable (if so equipped)?			
3.5	Support structure, foundation, ladder and/or platform unsecure or showing signs of severe corrosion or damage?			
4	Facility Drainage and Other Conditions			
4.1	Diked or undiked drainage deteriorated or damaged?			
4.2	Campus/facility storm water outfalls show evidence of oil releases?			

4.3	Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?			
	Additional Comments:			