Oil Spill Prevention Control and Countermeasure Plan

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Middle Georgia State University
Eastman Campus
71 Airport Road
Eastman, Georgia 31023

September 2015

woodardcurran.com
COMMITMENT & INTEGRITY DRIVE RESULTS

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FACILITY INFORMATION

TOPIC	INFORMATION
Name of Facility	Middle Georgia State University – Eastman Campus
Owner/Operator	University System of Georgia
Type of Facility	State University
Location of Facility	71 Airport Road, Eastman, Georgia, 31023
Campus Telephone Number	(478) 374-6980
Oil SPCC Coordinator	EHS Coordinator Office Phone: (478) 934-3054
Alternate Oil SPCC Coordinator	Aviation Campus Coordinator of Plant Maintenance Office Phone: (478) 374-6707
MGA Aviation Campus Police	(478) 374-6403
Maximum Oil Storage/ Handling Capacity	4,573 gallons
Spill History	This facility has had no reportable spills in the past 20 years
Sensitive Receptors	Gum Swamp and Granny Branch

REGULATORY REQUIREMENTS CROSS REFERENCE TABLE

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF OIL SPCC PLAN
Oil Spill Prevention Control and Countermeasure Plan	40 C.F.R. Part 112
Professional Engineer Certification § 112.3(d)	Section 1.6
Maintenance and availability of complete plan § 112.3(e)	Section 1.5
Amendments and plan review every 5 years § 112.5	Section 1.4
Discussion of Facility's conformance with 40 C.F.R. Part 112 § 112.7(a)(1)	Section 1.1
Description of physical layout of the Facility § 112.7(a)(3)	Chapter 2
Facility Diagram § 112.7(a)(3)	Figure 3-1
Type of oil in each container and its storage capacity § 112.7(a)(3)(i)	Chapter 3
Discharge prevention measures (including procedures for routine handling of products) § 112.7(a)(3)(ii)	Chapters 3 and 4
Discharge/drainage controls around containers/structures § 112.7(a)(3)(iii)	Chapter 3
Procedures for the control of a discharge § 112.7(a)(3)(iii)	Chapter 5 and Spill Response Flow Chart located in the Quick Reference Guide
Countermeasures for discharge discovery, response, and cleanup (including Facility and contractor capability) § 112.7(a)(3)(iv)	Chapter 5
Methods of disposal of recovered materials in accordance with applicable legal requirements § 112.7(a)(3)(v)	Section 5.5
Contact list and phone numbers for the Facility response coordinator, National Response Center, cleanup contractors with whom the Facility has response agreements, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge. § 112.7(a)(3)(vi)	Chapter 6 and Table 6-1
Information and procedures to enable a person to report a discharge as described in 40 C.F.R. § 112.7(a)(4)	Chapter 6

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF OIL SPCC PLAN
Prediction of direction, rate of flow and total quantity of oil as a result of each type of major equipment failure. § 112.7(b)	Chapter 3 and Tables 3-1 3-2, and 3-3
Appropriate containment and/or diversionary structures. § 112.7(c)	Chapter 3 and Tables 3-1 3-2, and 3-3
Demonstration of impracticability of secondary containment § 112.7 (d)	N/A
Inspections, Test, and Records	40 C.F.R. § 112.7(e)
Inspections and tests performed in accordance with written procedures. Written procedures and records of inspections and tests signed and kept with Plan for at least three years.	Chapter 4 Appendices B and C
Personnel Training and Discharge Prevention Procedures	40 C.F.R. § 112.7(f)
(1) Oil-handling personnel trained in 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.	Section 7.1
(2) Designated person responsible for spill prevention.	Section 1.2
(3) Schedule and conduct spill prevention briefings for oil-handling personnel at least once each year.	Section 7.2
Security	40 C.F.R. § 112.7 (g)
(1) Each handling, processing or oil storage Facility fully fenced entrance gates are locked and/or guarded when the Facility is unattended.	Chapter 8
(2) Flow and drain valves that directly discharge out are locked in closed position when not operational.	Chapter 8
(3) Oil pump starter controls locked in “off” position or only accessible to authorized personnel when not in use.	Chapter 8
(4) Pipeline loading/unloading connections capped when not in service.	Chapter 8
(5) Adequate Facility lighting to discover spills and prevent vandalism.	Chapter 8
Facility Tank Car and Tank Truck Loading/Unloading Rack	40 C.F.R. § 112.7(h)
(1) Quick drainage systems used in areas without catch basins or treatment Facility designed to handle discharges; containment designed to hold at least the maximum capacity of a single compartment of a tank car or tank truck loaded or unloaded at the Facility.	N/A
(2) Warning lights, physical barriers, or other measures provided to prevent truck departure prior to line disconnection.	N/A
(3) Inspection of drains and outlets prior to filling and departure of tank cars and trucks.	Section 3.6

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF OIL SPCC PLAN
Brittle Fracture Evaluation	40 C.F.R. § 112.7(i)
Field-constructed aboveground containers that have undergone repair, alteration, reconstruction, a change in service, or have discharged oil have been evaluated for risk of discharge or failure due to brittle fracture.	N/A
Conformance with Applicable State Rules	40 C.F.R. § 112.7(j)
Discussion of conformance with applicable requirements of any applicable more stringent State rules, regulations or guidelines.	Sections 1.1, 4.3, 5.5, and 6.2
Facility Drainage	40 C.F.R. § 112.8(b)
(1) Restrain diked drainage areas by valves.	N/A
(2) Use of manual open-and-closed drain valves to drain diked areas.	N/A
(3) Drainage of undiked areas into ponds, lagoons and catch basins to retain oil spills.	Section 2.2
(4) Design of in-plant ditches with diversion systems to return spilled oil to Facility.	N/A
(5) Engineer Facility drainage systems to prevent discharges in case of equipment failure or human error.	Section 2.2
Bulk Storage Containers	40 C.F.R. § 112.8(c)
(1) Container materials and construction compatible with products stored and conditions of storage.	Chapter 3
(2) Adequate and impervious secondary containment for tanks.	Chapter 3
(3) Requirements for drainage of diked rainwater bypassing treatment system (valve normally closed, valve opened only during drainage, inspect rainwater, records kept).	N/A
(4) Cathodic protection and regular leak testing for new buried metallic tanks.	N/A
(5) Partially buried metallic tanks.	N/A
(6) Integrity test aboveground containers on a regular schedule and when material repairs are done.	Section 4.2
(7) Internal heating coils monitored or treated to prevent leakage.	N/A
(8) Containers are engineered or updated in accordance with good engineering practices to avoid discharges: high level alarms, high level pump cutoffs, direct signal communication between the container gauger and the pumping station; fast response system for determining the liquid level of each container; regular testing of devices.	Chapter 3
(9) Plant effluent disposal facilities monitored regularly to detect system upsets.	N/A
(10) Prompt correction of visible leaks; prompt removal of oil accumulated in diked areas.	Section 4.1

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF OIL SPCC PLAN
(11) Portable tanks are positioned or located to prevent a discharge and have been provided with adequate secondary containment.	Section 3.5
Transfer Operations	40 C.F.R. § 112.8(d)
(1) Cathodic protective coating for buried piping, exposed pipes inspected for corrosion.	Chapter 3
(2) Terminal connections on out of service piping capped and marked as to origin.	N/A
(3) Pipe supports properly designed.	Chapter 3
(4) Aboveground valves and piping inspected regularly, integrity and leak testing conducted for buried piping.	Section 4.2
(5) Aboveground piping protected by notifying vehicular traffic entering Facility.	N/A
Substantial Harm Criteria	40 C.F.R. Part 112 Appendix C
Substantial harm criteria certification to exempt Facility from preparing a Facility Response Plan	Appendix A

RECORD OF CHANGES

DATE	DESCRIPTION OF CHANGE (S)	PAGE NUMBER
02/01/2012	Sec 3.1.2 change NW corner of main campus building to SW corner.	3-2
02/01/2012	Table 3.1 (For the refueler trucks) Change NW corner of main campus building to SW corner.	3-5
02/01/2012	Figure 3.1 diagram should show the refueler trucks as being located on the Southwest end of the campus, just beyond the oil/water separator on "alternate pavement # 4" behind the large hanger on the southwest end of the campus.	3-8
09/19/2013	Throughout the document, the following name changes occurred: MGC to MGSC, Middle Georgia College to Middle Georgia State University.	
09/19/2013	Additional contacts added to Quick Reference Guide and Emergency Contact Numbers.	
09/28/2015	Throughout the document, the following name changes occurred: MGSC to MGA, Middle Georgia State University to Middle Georgia State University.	
09/28/2015	Facility Information: Added MGA Aviation Campus Police Telephone Number	v

1. PLAN OVERVIEW

1.1 PURPOSE OF THIS PLAN

The U.S. Environmental Protection Agency (USEPA) has promulgated regulations requiring the Middle Georgia State University – Eastman Campus (MGA-Eastman), located at 71 Airport Road, Eastman, Georgia, to adopt an Oil Spill Prevention Control and Countermeasure Plan (Oil SPCC Plan), because the storage capacity exceeds applicable regulatory thresholds. See 40 C.F.R. § 112.1(d)(2)(ii). Specifically, the total aboveground oil storage capacity on campus is approximately 4,573 gallons, which exceeds 1,320-gallon aboveground planning thresholds. The campus maintains no underground oil storage. This Plan is designed to comply with all of the applicable Oil SPCC planning provisions of 40 C.F.R. Part 112.

In accordance with 40 C.F.R. § 112.20, MGA-Eastman is also required to determine whether the campus is classified as a high-risk facility that poses a threat of substantial harm to the environment, thereby triggering the Facility Response Plan requirements and associated appendices. The campus does not meet the substantial harm criteria, and is therefore not required to prepare and submit a Facility Response Plan to USEPA. An Applicability of Substantial Harm Criteria Checklist and Certification for the campus is included in Appendix A.

Each chapter of this Oil SPCC Plan identifies the federal and state laws and regulations it satisfies. A Regulatory Requirements Cross Reference Table, preceding Chapter 1, identifies applicable regulatory requirements and the Plan chapter(s) or section(s) that satisfy them. MGA-Eastman has adopted this Regulatory Requirements Cross Reference Table because this Plan does not follow the exact sequence specified in 40 C.F.R. § 112.7 of the regulations.

1.2 OWNERSHIP INFORMATION AND FACILITY CONTACT

MGA-Eastman is owned and operated by the University System of Georgia. The Oil SPCC Coordinator listed in the Facility Information section is the primary contact and the designated person responsible for oil spill prevention at the MGA-Eastman Campus.

1.3 MANAGEMENT APPROVAL AND COMMITMENT OF RESOURCES

MGA-Eastman is committed to conducting its operations in a safe and environmentally responsible manner. All faculty and staff are expected to promote and foster a safe work environment. Precautionary measures, including the adoption of this Oil SPCC Plan, have been taken to minimize the potential for incidents that could result in oil emergencies.

MGA-Eastman fully supports the adoption and implementation of this Plan. This commitment includes providing the manpower, equipment, and materials required to expeditiously control and remove any harmful quantity of oil that may be discharged. The Oil SPCC Coordinator is: (1) thoroughly familiar with the facility operations, oil storage locations, and this Plan; (2) prepared to implement this Plan during an emergency; and (3) committed to ensuring oil spill preventive measures are addressed during non-emergency times.

1.4 PLAN REVIEW AND AMENDMENTS

This Oil SPCC Plan is intended to be an integral part of the operations at MGA-Eastman. To increase its effectiveness, this Oil SPCC Plan will be amended whenever:

1. It fails in an emergency;

2. There is a significant change in design, construction, operation, or maintenance in a manner likely to impact the effectiveness of this Plan;

3. Some other circumstance significantly increases the potential for releases of oil products or other changes in the response procedures as necessary;

4. An exercise or emergency response drill indicates an amendment is necessary;

5. Either the Oil SPCC Coordinator, Alternate Coordinator, or emergency response contractors change;

6. The Regional Administrator of the USEPA deems a change to be necessary; or

7. There is a change in applicable statutes or regulations.

Technical amendments will be certified by a licensed Professional Engineer (P.E.) within six months after a change in design, construction, operation, or maintenance occurs which materially effects the potential for discharging oil into or upon the navigable waters of the United States or adjoining shorelines. Non-technical amendments, such as changing the emergency contact list, phone numbers, or names do not necessitate P.E. certification. In addition, if this Oil SPCC Plan is amended, the changes will be documented in the "Record of Changes" in the front of this Plan.

A complete review and evaluation of this Oil SPCC Plan will be conducted at least once every five years, as required by the regulations. The review and evaluation will be documented and the Oil SPCC Coordinator will sign a statement as to whether the Plan will be amended. The statement will read: "I have completed a review and evaluation of this Oil SPCC Plan on [date] and [will/will not] amend the Plan as a result." If warranted, based on the review and evaluation, MGA-Eastman will amend the Plan within six months of the review to include more effective prevention and control technology if such technology: (1) significantly reduces the likelihood of a discharge from the facility; and (2) has been field-proven at the time of review. MGA-Eastman will implement such amendments within six months of the preparation of any amendments to the Plan. The review log for this Oil SPCC Plan is included as Table 1-1.

1.5 MAINTENANCE AND AVAILABILITY OF PLAN

A complete master copy of this Oil SPCC Plan is maintained in the EHS Office. Additionally, a copy of the Plan will be kept in a location where it can be immediately accessed by oil-handling personnel. The Plan shall be made available to the Regional Administrator of the USEPA, or his/her designee, if so required. This Plan is not, under typical circumstances, submitted to the USEPA, or to Georgia Environmental Protection Division (Georgia EPD).

1.6 ENGINEER'S CERTIFICATION

I hereby certify that I am familiar with the oil storage facilities at MGC-Eastman and with this Oil SPCC Plan. I attest that:

1. I am familiar with the requirements of 40 C.F.R. Part 112;
2. My agent has visited and examined the oil storage facilities on the MGC-Eastman Campus;
3. This Oil SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 C.F.R. Part 112;
4. Procedures for required inspections and testing have been established; and
5. This Plan is adequate for the Middle Georgia College – Eastman Campus.

40 C.F.R. § 112.3(d)

Jennifer Suttles
Name of Registered P.E.

Signature of Registered P.E.

Date: 6/18/2010

Registration No.
State: Georgia

Table 1-1: Oil SPCC Provisions Review Log

Review #1

"I have completed a review and evaluation of this Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #2

"I have completed a review and evaluation of this Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #3

"I have completed a review and evaluation of this Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

Review #4

"I have completed a review and evaluation of this Oil SPCC Plan on _____ and [will/will not] amend the Plan as a result."

Name: _____

Signature: _____

Title: _____

2. FACILITY DESCRIPTION

2.1 FACILITY LOCATION AND OPERATIONS

Middle Georgia State University (MGA) is a coeducational University, which offers a wide range of programs of study designed to prepare the student for entry directly into business, industry, and other careers. The University offers associate and select baccalaureate and master degrees. MGA has five campuses in Macon, Cochran, Dublin, Eastman and Warner Robins.

The aviation campus in Eastman serves both commuting and residential students. The University offers the following aviation programs at its Eastman campus:

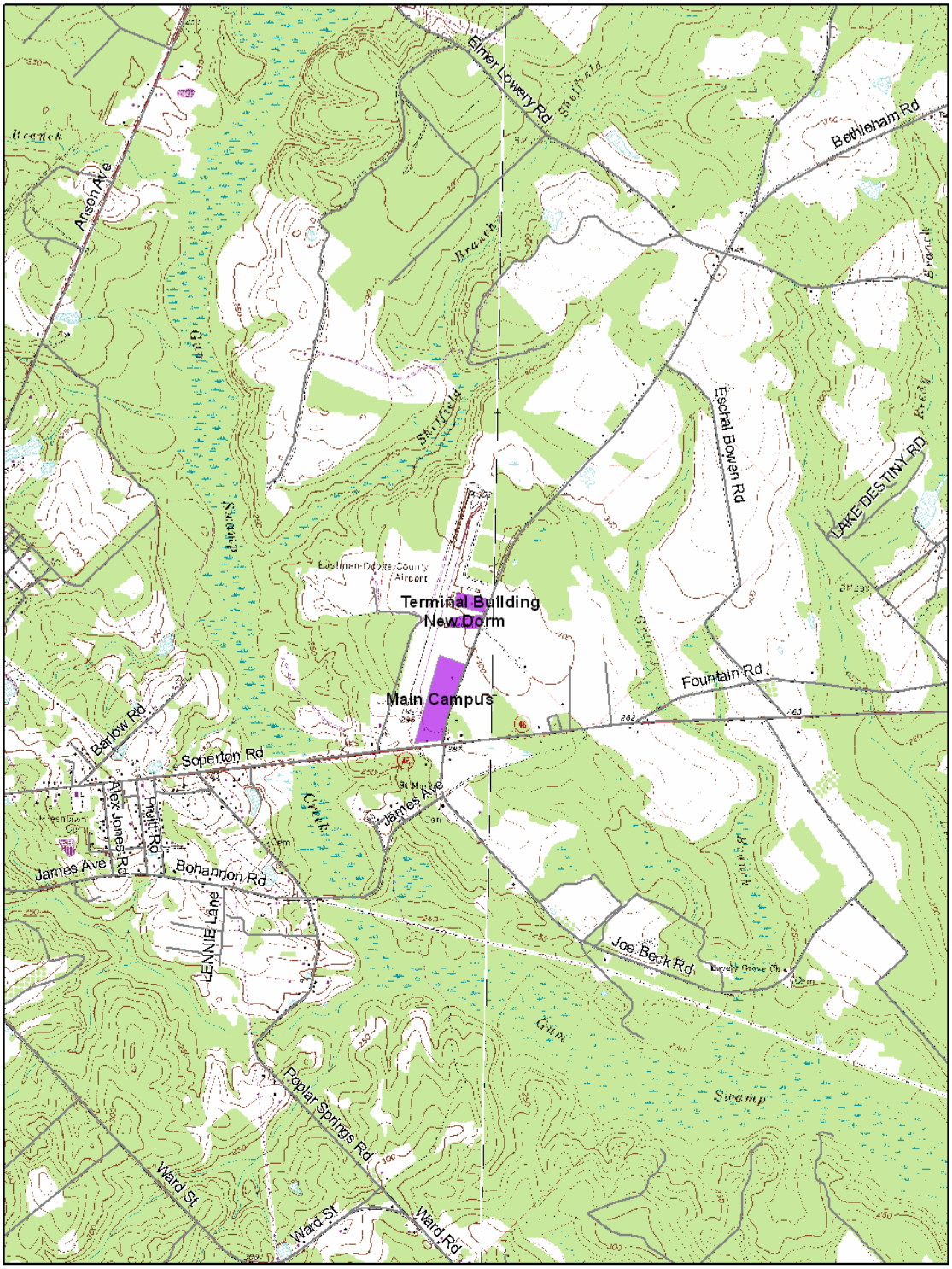
- Aviation Maintenance Technology
- Aircraft Structural Technology
- Flight
- Air Traffic Management
- Airport Management
- Logistics Management
- Avionics

The campus is located at 71 Airport Road, Eastman, Georgia, shown on Figure 2-1. Airport and industrial property borders the site on all sides. Georgia highway 46 (Soperton Highway) borders the site to the south; Airport Road borders the site to the east, the Heart of Georgia Regional Airport borders the site to the west and north. The campus is made up of a terminal building, a new student dormitory, and a main campus. Areas surrounding the buildings are made up of paved parking areas.

2.2 DRAINAGE PATHWAY AND DISTANCE TO NAVIGABLE WATERS

The MGA-Eastman Campus is situated on a ridge between Gum Swamp and Granny Branch. Runoff from the campus drains south to Gum Swamp. Impervious surfaces such as roadways and parking lots are graded to direct stormwater into the City's stormwater collection system. The stormwater collection system consists of roof drains, trench drains, and catch basins that discharge south to Gum Swamp.

Figure 2-1: Site Locus



3. OIL STORAGE, CONTAINMENT, AND DELIVERY PROCEDURES

This chapter identifies and describes the MGA-Eastman Campus' oil storage tanks and containers, including their design, related secondary containment, diversionary structures, and transfer equipment. This chapter also identifies the most likely causes of potential spills, predicted spill pathways, probable directions, estimated maximum spill quantities, rates of flow, and satisfies many of the requirements of 40 C.F.R. §§ 112.7 and 112.8 (including 40 C.F.R. §§ 112.7(a)(3)(i)-(iii) and 112.7(h) and 112.8(b) and (c)). Tables 3-1, 3-2, and 3-3 provide a description of the oil storage locations, capacities, means of secondary containment, and total oil quantity stored on-site. Figure 3-1 illustrates the location of the bulk oil storage tanks and oil-filled equipment.

3.1 ABOVEGROUND TANKS AND CONTAINERS

The following subsections provide details on the ASTs located at the Eastman Campus. Potential oil release pathways and additional AST details are provided in Table 3-1. The rate of flow of a potential spill from any of the tanks or containers would depend on several factors (e.g., the size of the leak and liquid head above the leak) and is difficult to determine accurately until all factors associated with a specific spill are known. For all aboveground bulk storage containers provided with secondary containment, a release from the containers would remain within the secondary containment. However, Table 3-1 provides potential oil release pathways in the event of secondary containment failure or when it is not present. The maximum potential spill volumes for the aboveground tanks are equivalent to their capacities (i.e., the maximum spill quantity for a 100-gallon AST is 100 gallons). However, if an incident occurs during tank filling, the potential volume of the release is equal to the capacity of the delivery or pick up vehicle.

The likelihood of a release discharging to water or land is low because MGA-Eastman: (1) has provided all bulk oil storage containers with appropriate containment structures and/or diversionary structures or equipment to prevent a discharge; (2) complies with state and federal regulations for the handling and storage of petroleum; (3) performs regular preventive maintenance and inspection of all oil storage facilities; (4) employs Best Management Practices to avoid minor spills during routine operations; and (5) utilizes container materials and construction compatible with products stored and conditions or storage.

3.1.1 Storage Tanks

MGA-Eastman maintains four identical 200-gallon single-walled steel tanks for the collection of waste oil and used Jet A and 100 Octane Aviation Fuel. The tanks are skid mounted on a poured concrete apron adjacent to the Hangers in the Main Campus Building. The tanks are surrounded by a concrete containment berm with adequate capacity to contain 250 gallons. A roof over the tanks prevents the accumulation of stormwater within the berm. The containment area does not have a drain valve. Each tank is equipped with a closable collection funnel that has been secured on the top of the tank. When not in use both the collection funnel and tank fill port are locked to prevent unauthorized access. All four tanks are equipped with level gauges and are visible on all sides to detect a release. The pathway for potential oil releases and other tank details are described in Table 3-1.

The Ultracept® oil/water separator which is used to processes wastewater collected from the wash stand is equipped with a 275-gallon single-walled steel oil collection tank. The tank is pad mounted on steel supports adjacent to the Ultracept unit. The oil/water separator uses a series of chambers and oil skimmers to remove floatable oils and collect them in the storage tank. Secondary containment for the oil collection tank and connecting piping is provided by a concrete containment berm around the edge of the pad. The berm creates a diked area that has sufficient capacity to contain the entire contents of the tank and is equipped with a sump that drains accumulated oil and/or

stormwater back into the oil/water separator for treatment. The pathway for potential oil releases and other tank details are described in Table 3-1.

3.1.2 Mobile Equipment

MGA-Eastman maintains two 750-gallon mobile refueler trucks. The trucks store Jet A Fuel and 100 Octane Aviation Fuel. The mounted tanks are constructed of single walled steel and are used to refuel planes and aviation equipment on campus. When not in service the pump starter controls are locked in the off position and the trucks are stored in a designated area at the southwest corner. This area is equipped with an asphalt containment berm that has sufficient capacity to contain the entire contents of one refueler tank. The containment area is covered by a roof to prevent the accumulation of stormwater. Both tank trucks are equipped with level gauges and are visible on all sides to detect a release. The pathway for potential oil releases and other tank details are described in Table 3-1.

MGA-Eastman also maintains a smaller 200-gallon trailer mounted fuel tank. This tank stores unleaded gasoline for fueling golf carts and equipment. The mounted tank is constructed of double walled steel and is equipped with an electric dispensing unit used. The double-walled construction provides sufficient secondary containment for the entire contents of the tank. The tank is typically stored on the poured concrete apron adjacent to the Hangers. When not in service the dispensing unit is locked to prevent unauthorized access. The tank is equipped with a level gauge and is visible on all sides to detect a release. The pathway for potential oil releases and other tank details are described in Table 3-1.

3.1.3 Emergency Generators

MGA-Eastman maintains two standby generators. The Olympian emergency generator located on the poured concrete apron adjacent to the Hangers provides emergency power for the Main Campus Building. This unit combusts Jet A fuel which is maintained in a 200-gallon double-walled steel belly tank. The double-walled construction provides adequate secondary containment for the entire contents of the tank and the drain valve for the interstitial space provides a means to visually detect a release. The fill port for the generator is located on top of the belly tank within the generator housing. All transfer piping is integral to the unit and is also contained within the generator housing. The pathway for potential oil releases and tank system details are described in Table 3-1.

The portable ground power unit is used for ground support and instructional purposes. This unit combusts Jet A fuel which is maintained in a 75-gallon double-walled steel tank which is integral to the unit. The double-walled construction provides adequate secondary containment for the entire contents of the tank. The unit is trailer mounted and visible on all sides to detect a release. All transfer piping is integral to the unit and is contained within the equipment housing. The pathway for potential oil releases and tank system details are described in Table 3-1.

3.2 HYDRAULIC ELEVATORS

MGA-Eastman operates two hydraulic elevators with hydraulic reservoirs of 55 and 75 gallons. The elevators are maintained by an outside vendor on an as-needed basis. Both elevator reservoirs are located in locked mechanical rooms. The mechanical rooms have poured concrete floors with no floor drains or other appurtenances that would allow a potential release to leave the building. The elevator locations, storage capacity, oil type, and predicted direction of release are described in Table 3-2.

3.3 ELECTRICAL TRANSFORMERS

There are five pad-mounted oil filled transformers located on the MGA-Eastman campus, with oil storage capacities ranging in size from 28 to 659 gallons. Each transformer contains non-PCB mineral oil dielectric fluid (MODF). There are internal pans in each transformer to contain the oil, in case of a spill. Table 3-3 provides the location of the transformers, their kVA, storage capacity, and means of secondary containment.

3.4 DRUM STORAGE

No drums are maintained on the MGA-Eastman campus. However, if temporary drum storage is necessary, the following general procedures and practices will be observed by MGA-Eastman personnel, as applicable, with respect to drum loading/unloading:

- Drum covers secured and tightened prior to moving.
- Surrounding floor clean and dry prior to removing drums from pallets or placing drums on pallets.
- Ramps and proper tools (i.e., dollies, forklifts) used to lift drums from on top of pallets onto ground level (or vice-versa).
- Tools that could puncture or perforate the drum are not to be used during drum movement.
- Supplies of oil absorbents readily available during drum movement activities.

3.5 OIL TRANSFER AND DELIVERY PROCEDURES

3.5.1 Transfer Areas

The oil transfer areas (i.e., the fill ports and the waste oil drums) on the MGA-Eastman campus are maintained and operated to prevent potential releases from entering drains or surface water. Specifically, all oil transfers are monitored and countermeasures are immediately taken if a release is imminent or occurring. The most likely oil release scenarios would be a tank overfill or a ruptured hose. The pathway for a potential release in transfer areas is described in Table 3-1. The potential amount of oil that could be released would be dependent on the particular circumstances; however based upon typical oil delivery vehicle pump rates, it is estimated that less than fifteen gallons of oil would be released during a transfer incident before the driver and/or MGA-Eastman staff overseeing the delivery would respond by shutting off the flow from the delivery vehicle.

MGA-Eastman does not have any oil loading/unloading racks on campus and is therefore not subject to the requirements 40 C.F.R. § 112.7(h).

3.5.2 Oil Transfer Procedures

Tank filling operations on campus consist of refueling operations and removal of waste oil and fuels by a licensed vendor. All oil transfer operations are conducted during daylight hours and at the individual fill port for the tank. While MGA-Eastman is not required to provide secondary containment for the loading/unloading areas, the procedures and practices described in this section are followed by MGA-Eastman personnel to ensure that a release does not occur during tank filling.

Prior to Loading or Unloading

- Determine the available capacity of the receiving tank using the tank monitoring system or level gauge. This information should then be communicated to the individual responsible for the transfer.
- Move spill containment equipment, such as booms or spill barriers, into the unloading area;
- Ensure that the drip pans are placed under all pump hose fittings (if applicable) after the hose is hooked up to the tank and prior to unloading;
- Ensure that the fill nozzle is placed in the appropriate tank appurtenance;

During Unloading

- All oil transfers must be attended. The individual responsible for the transfer must remain with the vehicle at all times during loading or unloading;
- Periodically check the tank monitoring system or level gauge to ensure that the available capacity is not exceeded;
- Prohibit smoking, lighting matches or the use of cellular telephones near the tank truck during unloading;

After Fuel Unloading is Completed

- Prior to disconnecting and removing the flexible hoses, ensure that they are drained;
- Pour any fuel accumulated in the drip pans into the appropriate waste tank;
- Cap and secure the fill port; and
- Inspect that area around the tank truck prior to departure for any leaks.

See 40 C.F.R. § 112.7(h); Best Management Practice

Table 3-1: Aboveground Oil Storage Tanks and Containers

Tank Description	Location	Tank Capacity (gallons)	Contents	Material of Construction	Means of Secondary Containment	Alarms, Gauges, and Leak Detection	Direction of Potential Spill or Release (If Secondary Containment Fails)
Waste Fuel Tank	Main Classroom Building	200	Waste Jet A Fuel	Steel	Concrete Containment Berm	Level Gauge; Visible On All Sides	Spill due to overfilling or tank failure would discharge to the underlying concrete pad and migrate east towards the airport taxiway.
Waste Fuel Tank	Main Classroom Building	200	Waste 100 Octane Aviation Fuel	Steel	Concrete Containment Berm	Level Gauge; Visible On All Sides	
Waste Oil Tank	Main Classroom Building	200	Waste Oil	Steel	Concrete Containment Berm	Level Gauge; Visible On All Sides	
Waste Oil Tank	Main Classroom Building	200	Waste Oil	Steel	Concrete Containment Berm	Level Gauge; Visible On All Sides	
Ultracept Collection Tank	Main Classroom Building	275	Waste Oil	Steel	Concrete Containment Berm	Visible On All Sides	Spill due to overfilling or tank failure would discharge to the underlying concrete containment which drains into the washwater holding tank below the unit. A leak from the piping would also discharge into the containment and drain into the holding tank.
Refueler Truck	Southwest Corner of Main Campus Building	750	Jet A Fuel	Steel	Asphalt Containment Berm	Level Gauge; Visible On All Sides	Spill due to overfilling or tank failure would discharge to the underlying asphalt or concrete where the vehicle is located. Absorbent booms deployed during refueling operations would be used to contain the release.
Refueler Truck	Southwest Corner of Main Campus Building	750	100 Octane Aviation Fuel	Steel	Asphalt Containment Berm	Level Gauge; Visible On All Sides	
Trailer Mounted Fuel Tank	Main Classroom Building	200	Unleaded Gasoline	Steel	Double Walled Construction	Level Gauge; Visible On All Sides	Spill due to overfilling or tank failure would discharge to the underlying concrete pad and migrate east towards the airport taxiway.

Tank Description	Location	Tank Capacity (gallons)	Contents	Material of Construction	Means of Secondary Containment	Alarms, Gauges, and Leak Detection	Direction of Potential Spill or Release (If Secondary Containment Fails)
Olympian Emergency Generator	Main Classroom Building	200	Jet A Fuel	Steel	Double Walled Construction	Level Gauge	Spill due to overfilling or tank failure would discharge to the underlying concrete pad and migrate east towards the airport taxiway.
Portable Ground Power Unit	Main Classroom Building	75	Jet A Fuel	Steel	Double Walled Construction	Level Gauge; Visible On All Sides	Spill due to overfilling or tank failure would discharge to the underlying asphalt or concrete where the vehicle is located.

Table 3-2: Hydraulic Elevators

Elevator ID	Location	Total Storage (gallons)	Major Failure Potential	Oil Type	Predicted Direction of a Release
E1	Main Classroom Building	55	Tank/Pipe	Hydraulic Oil	A release from the hydraulic reservoir or piston would discharge to the underlying concrete floor and be contained within the building.
E2	New Student Dorm	75	Tank/Pipe	Hydraulic Oil	

Table 3-3: Oil Filled Transformers

Transformer ID	Location	Total Storage (Gallons)	Major Failure Potential	Oil Type	Predicted Direction of a Release
292-038-005-001	Terminal Building	261	Fire/Explosion	Non-PCB Mineral Oil Dielectric Fluid	Release would discharge to concrete pad and migrate to the stormwater catch basin approximately 10 ft away.
292-038-006 04	Terminal Building	28	Fire/Explosion	Non-PCB Mineral Oil Dielectric Fluid	Release would discharge to concrete pad and migrate to the stormwater catch basin approximately 10 ft away.
292048006	Aviation Hall	417	Fire/Explosion	Non-PCB Mineral Oil Dielectric Fluid	Release would discharge to concrete pad and migrate to the adjacent soil.
292 48 07	Aviation Hall	28	Fire/Explosion	Non-PCB Mineral Oil Dielectric Fluid	Release would discharge to concrete pad and migrate to the adjacent soil.
292-058-008	Main Classroom Building	659	Fire/Explosion	Non-PCB Mineral Oil Dielectric Fluid	Release would discharge to concrete pad and migrate toward the airport taxiway.

Figure 3-1: Main Campus Facility Diagram

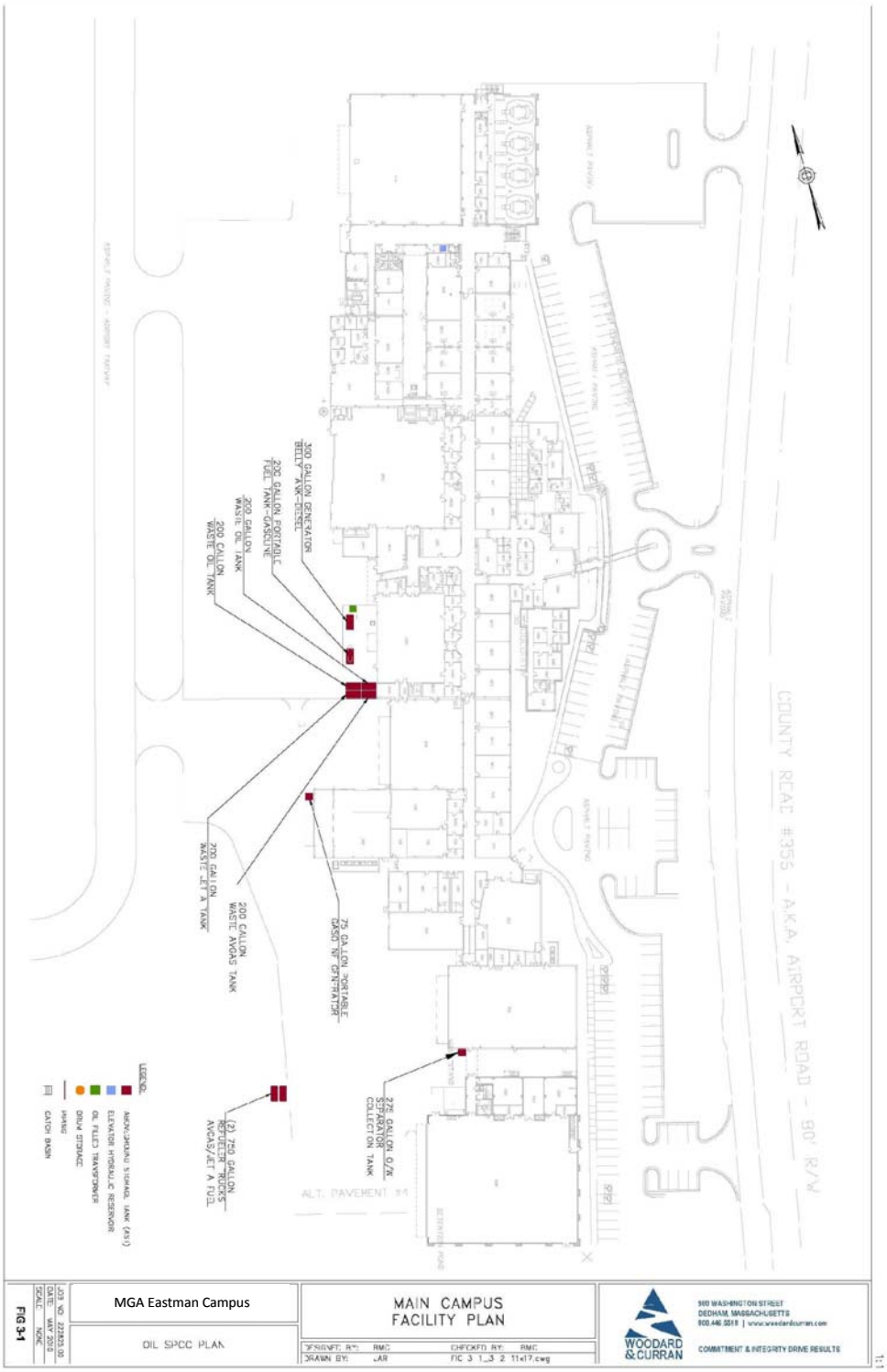
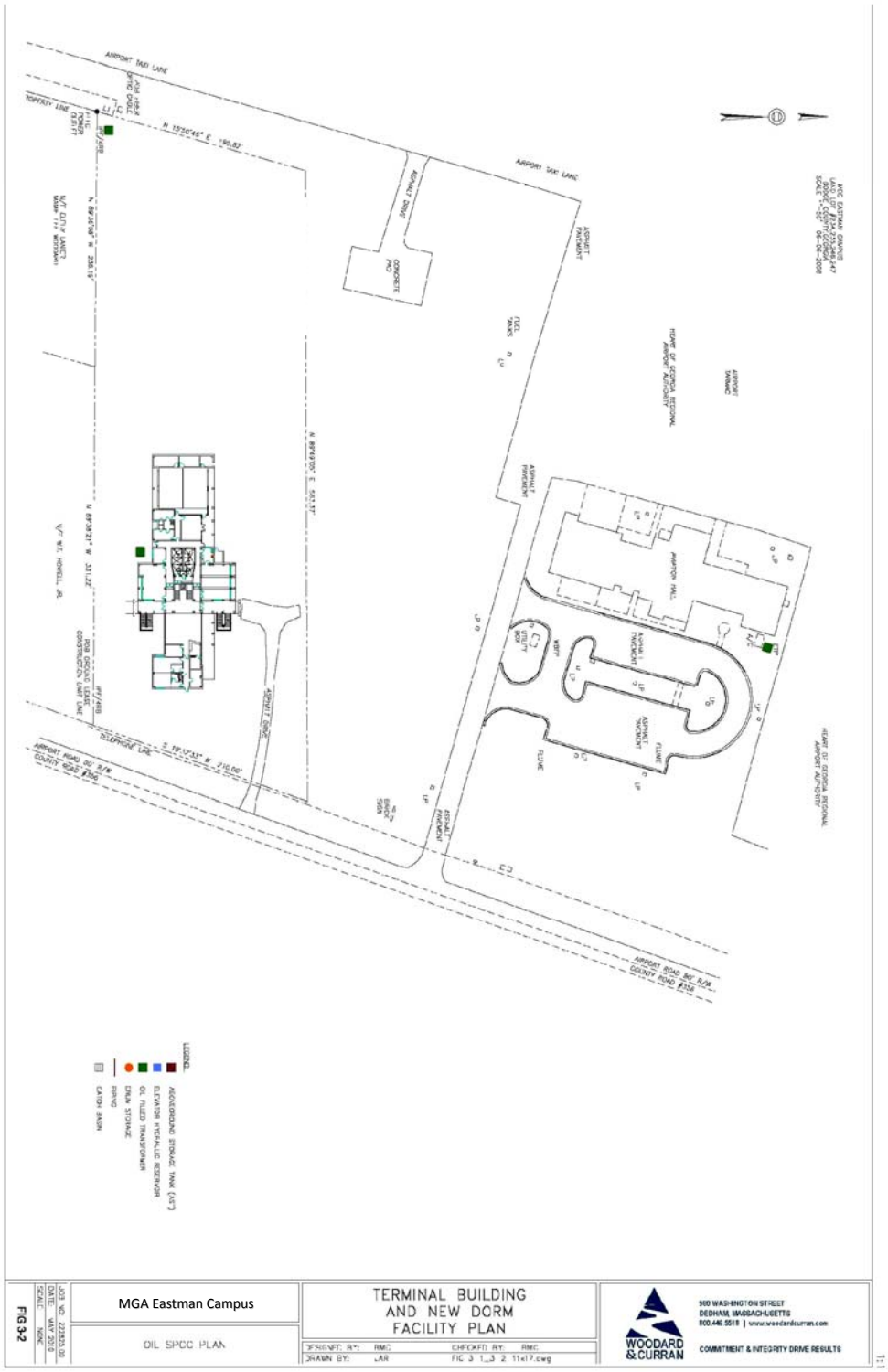


Figure 3-2: Terminal Building and New Dorm Facility Diagram



4. INSPECTION, TESTING, AND PREVENTIVE MAINTENANCE PROCEDURES

MGA-Eastman implements a comprehensive inspection, testing, and preventive maintenance program for its oil storage tanks, containers, containment structures, and associated appurtenances and equipment. This chapter describes these procedures and MGA-Eastman's record keeping practices in accordance with 40 C.F.R. § 112.7(e); and 40 C.F.R. § 112.8(c).

4.1 GENERAL SPILL PREVENTION STRATEGY

The primary method of spill management at the MGA-Eastman Campus is spill prevention. This has been emphasized through the proper design of tank systems, personnel training, and regular inspections. All MGA-Eastman personnel involved with the use, storage, or management of oil are trained to report oil releases immediately to ensure prompt corrective action. In addition, certain employees are trained to contain spills using appropriate methods and equipment (assuming containment can be completed without risk to human health) until emergency response personnel with specialized response training and equipment arrive on site. The designated person responsible for oil spill prevention at the MGA-Eastman Campus is the Oil SPCC Coordinator identified in the Facility Information section.

In the event that visible leaks are detected, they are promptly stopped, and preventive maintenance is performed to ensure that the cause of the leak is addressed. If oil is released into a containment basin, containment manhole, or into a spill pallet used to contain drums, the released oil is immediately removed and properly managed.

4.2 INSPECTION AND TESTING OF ASTS

As required by 40 C.F.R. § 112.8 (c) (6), MGA-Eastman combines visual inspection with another testing technique for each tank, container, and drum that has an oil storage capacity of 55 gallons or greater.[1] The elements of the MGA-Eastman inspection and testing program for ASTs were developed in accordance with the Steel Tank Institute's (STI's) "Standard for the Inspection of Aboveground Storage Tanks," SP001, 4th Edition (July 2006). If the results of an inspection or test indicate evidence of leakage or significant deterioration of a tank or container, or improper operation of associated devices, MGA-Eastman will remove the tank, container or device from service and either repair or replace it.

4.2.1 Monthly Visual Inspections

Trained MGA-Eastman personnel complete standard monthly visual inspections of all ASTs, containers, and drums that have oil storage capacities equal to or greater than 55 gallons. Tank equipment (i.e., gauges, valves, leak detection systems, alarm/warning systems) is inspected for evidence of maintenance deficiencies and periodically tested to ensure that it remains in good working order. Visible piping is inspected along with the tank itself in accordance with the inspection procedures described in this chapter. These inspections ensure early detection and prompt correction of visible leaks and removal of oil accumulated in containment structures.

Monthly inspections are performed by designated personnel who have been trained to perform the inspections per STI Standard SP001. The inspection form contained in Appendix B are utilized for the monthly inspections. All

[1] Oil-filled electrical and operating equipment are not considered bulk storage containers for these purposes, and are therefore not subject to the inspection and testing requirements. As a best management practice, MGA-Eastman does perform inspections of oil-filled electrical equipment as described in this Section.

inspection and testing records are signed and maintained in Appendix C for a period of at least three years. See 40 C.F.R. § 112.7(e).

4.2.2 Formal External Inspections and Leak Testing

Per STI Standard SP001, shop-fabricated tank systems are subject to formal external inspections and leak testing requirements according to the capacity of the tank, the means of secondary containment, and the presence of a continuous release detection method (CRDM).[2] However, because all the ASTs on the MGA-Eastman Campus are all provided with secondary containment and a CRDM, and each has less than 5,000 gallons of storage capacity, formal external inspections and leak testing by a certified tank inspector are not required on a routine basis per STI standards.

4.2.3 Tank Integrity Tests

MGA-Eastman will retain the services of a qualified tank testing contractor to perform a tank integrity test in accordance with STI Standard SP001, API Standard 653, or other industry standard determined by the tank tester to be appropriate for the type of tank, under the following circumstances:

- Whenever material repairs or alterations are made to the tank;
- If evidence of a leak is detected;
- In the event of damage to the tank or containment structure; or
- If the results of a formal tank inspection reveals evidence of leakage or deterioration.

An affected tank will remain out of service until it is repaired and tested to confirm its integrity or it is otherwise replaced.

4.2.4 Regular Testing of Devices

In addition to the frequent visual inspections, MGA-Eastman personnel will perform regular testing of equipment and devices associated with oil storage. All high level alarms, product level gauges, and other monitoring devices will be periodically tested and/or inspected in accordance with the manufacturer's instructions to ensure they are in working order.

4.3 HYDRAULIC ELEVATOR INSPECTIONS

The oil-containing hydraulic elevators at the facility are inspected and serviced on a regular basis by an outside vendor. Records of the inspections are maintained in the elevator mechanical room and by the vendor. Additional informal inspections are conducted by MGA-Eastman personnel when working in the vicinity of the elevators.

[2] A continuous release detection method is defined under the STI standard as a means of detecting a release of liquid through inherent design. It can be passive, such as visual detection, but must be designed in accordance with good engineering practice.

4.4 OIL FILLED TRANSFORMERS

The oil-containing electric transformers at the facility are inspected and serviced on a routine basis by Georgia Power Company. Records of the inspections and maintenance are maintained by Georgia Power Company. Additional informal inspections are conducted by MGA-Eastman personnel when working in the vicinity of the transformers.

4.5 55-GALLON DRUM INSPECTIONS

When present on campus, MGA-Eastman ensures that 55-gallon drums are visually inspected on a monthly basis in accordance with the criteria on the inspection sheet included in Appendix B. The following usual and customary business practices are also followed to ensure the integrity of 55-gallon drums:

- Loading/Unloading Procedures. To ensure that drum loading and unloading procedures are performed in a way that is protective of the drums and their contents, such activities are conducted in accordance with USDOT requirements for loading and unloading as described in Section 3.4.

- Replacement and Disposal. If monthly visual inspections or informal inspections reveal that a drum is leaking, dented, corroded, or compromised in some way, MGA-Eastman will immediately transfer the oil in the drum to a new drum and ensure that the empty drum is properly disposed of.

4.6 PREVENTIVE MAINTENANCE PROCEDURES

MGA-Eastman personnel routinely inspect and replace equipment as part of the preventive maintenance program. If an inspection shows that continuation of an operation or practice is likely to result in an imminent release, prompt action will be taken. Examples of imminent release indicators include, but are not limited to, leaking valves, pumps, and pipe joints; cracked or corroded containers; malfunctioning relief devices; and inadequate gauging. Tanks are fail-safe engineered to avoid spills, and overfill prevention equipment is maintained in good working order.

If an inspection shows that an operation or practice is not an imminent threat to cause a release, but is malfunctioning and could lead to a release if not remedied, appropriate repairs/actions are completed as soon as practicable. Visible leaks are promptly corrected. Examples of probable release causes include, but are not limited to, damaged secondary containment structures and external coating deficiencies.

4.7 RECORDKEEPING PROCEDURES

MGA-Eastman maintains signed records of inspections and tests that it performs in accordance with the written procedures described in this chapter. These records are kept with the copy of the Oil SPCC Plan that is maintained in the Oil SPCC Coordinator's office. All AST inspection records are kept for a minimum of three years. See this Plan and 40 C.F.R. § 112.7(e).

5. OIL SPILL RESPONSE AND EQUIPMENT

This chapter identifies MGA-Eastman's oil spill cleanup equipment, describes oil spill response procedures, and identifies outside responders who may be contacted in the event of an oil release. This chapter also describes disposal procedures for material recovered from an oil release and provides contact information for potential responders. This chapter satisfies the requirements of 40 C.F.R. § 112.7(a)(3)(iv), (v), and (vi). General oil spill response procedures are provided in this chapter, followed by specific procedures organized by type of release.

5.1 OIL SPILL EQUIPMENT

MGA-Eastman Campus maintains absorbent materials in the Main Campus Building Hanger to stop and contain small releases. The inventory of spill equipment is inspected as part of the monthly AST inspections to ensure that it is fully stocked and ready for use in the event of an oil spill. If, during an inspection, items are noted as depleted, additional supplies are ordered and replaced as soon as reasonably possible.

Spill equipment is used only by trained personnel who are familiar with the hazards posed by the spilled material and are knowledgeable of how to manage the spill cleanup residue. Trained MGA-Eastman employees may respond to small leaks or spills that do not pose significant risks to health or safety. If a major oil release occurred at the facility, the Oil SPCC Coordinator would contact outside responders (i.e., Fire Department or response contractors).

5.2 GENERAL OIL SPILL RESPONSE

Activities that may result in an oil spill at the MGA-Eastman Campus include:

- Overfill during delivery;
- Tank or piping failure;
- Elevator hydraulic oil release;
- Waste oil and fuel removal; and
- Minor surface spills during routine maintenance.

Absorbent cleanup materials will generally be used to contain and clean up minor spills. In the event of a minor oil release, MGA-Eastman personnel are trained to place absorbent booms and/or drain covers/mats on all floor drains, catch basins, and any other drainage pathway to prevent dispersion.

When spilled material has been recovered, MGA-Eastman personnel ensure that it is either reused, if possible, or disposed of in accordance with all applicable requirements.

5.2.1 Tank Overfill During Delivery

Oil deliveries are conducted and monitored by MGA-Eastman personnel and/or private carriers. Preventing a spill during delivery is primarily the responsibility of the operator. In the case of a minor spill, or a release of oil less than ten gallons, absorbent pads and booms, mops, and Speedi-Dry will be used by trained MGA-Eastman personnel or carrier for cleanup. The used cleanup materials will be collected using non-sparking tools and disposed of in accordance with the procedures described in Section 5.5 below.

5.2.2 Tank Failure

In the case of visual evidence of a tank failure which results in a minor spill, absorbent materials will be used to contain and cleanup the spill as described in this section. The tank and associated piping and equipment will be inspected to identify the origin of the release. If oil was released due to faulty equipment or broken piping, MGA-Eastman will immediately correct the problem. If it is determined that the tank leaked, the Oil SPCC Coordinator will immediately contact an emergency response contractor to pump out the tank until it is repaired or replaced.

5.2.3 Minor Spills

Minor spills (e.g., less than ten gallons of oil) may occur as a result of routine maintenance activities. Minor spill response materials (i.e., absorbents, spill pads, Speedi-Dry, etc.) will be used, managed and disposed of in accordance with the procedures described in this section. If the spill occurs in an unpaved area, the stained ground surface (soil) shall be removed using non-sparking tools, and collected and disposed of in accordance with the procedures described in Section 5.5 below.

5.2.4 Large Quantity Spills

For spills that are beyond the capabilities of MGA-Eastman employees and equipment, the Oil SPCC Coordinator will contact an emergency response contractor, the Eastman Fire Department and the Dodge County Board of Health, if necessary. Regardless of the amount spilled, if an oil release reaches a floor drain, storm water catch basin, or wetlands the Oil SPCC Coordinator will follow the notification procedures outlined in Chapter 6. The Oil SPCC Coordinator and Alternate are the primary responsible parties at the MGA-Eastman Campus for the coordination of any response and cleanup effort.

The Eastman Fire Department will usually be the first agency called to respond to an oil release. The Fire Department may choose to turn the response operation over to MGA-Eastman's private clean up contractor, identified in Table 6-1, who provides emergency response and clean up services 24 hours a day, 365 days a year, and has the capabilities and equipment to handle any release of oil at the MGA-Eastman Campus.

5.3 OIL SPCC COORDINATOR RESPONSIBILITIES

The person who will likely coordinate oil release response at MGA-Eastman Campus is the Oil SPCC Coordinator. The general responsibilities of the Oil SPCC Coordinator include:

- Oversee the development, implementation, and maintenance of the Oil SPCC Plan and oil spill prevention program;
- Serve as the designated person responsible for oil spill prevention;
- Identify any facility changes that would warrant amendments to the Oil SPCC Plan;
- Coordinate, organize and/or conduct annual spill prevention briefings for oil-handling personnel; and
- Maintain the spill containment equipment and supply areas at the designated locations.

The responsibilities of the Oil SPCC Coordinator during oil spill emergencies include:

- Assess the type, magnitude, and extent of the spill;
- Contact the facility responders to bring spill containment equipment to the spill location;
- Supervise facility responders during spill cleanup;

- Contact and coordinate with local off-site facility responders (i.e., fire, police, clean up contractors listed in Table 6-1), if necessary;
- Provide for emergency medical care or arrange transportation via ambulance for off-scene medical services, if necessary;
- Arrange for the cleanup and proper disposal of any released oil; and
- Report any spill of a reportable quantity, as defined in Section 6.1, to Georgia EPD ((800) 241-4113) and if necessary to the National Response Center ((800) 424-8802).

5.4 ALTERNATE OIL SPCC COORDINATOR RESPONSIBILITIES

In the event that the Oil SPCC Coordinator is not available to coordinate an oil release response, MGA-Eastman has an Alternate Oil SPCC Coordinator. The role of the Alternate Oil SPCC Coordinator is: (1) to act as Oil SPCC Coordinator whenever the primary Coordinator is unable to perform his duties, or (2) to assist the Oil SPCC Coordinator in the event of an actual spill or release event.

The Alternate Oil SPCC Coordinator is familiar with the role and responsibilities of the Oil SPCC Coordinator as listed above, in the event that he is called upon to fill this role during an actual spill emergency. The Oil SPCC Coordinator may delegate any of the responsibilities listed above to the Alternate Coordinator.

The Oil SPCC Coordinator and the Alternate Oil SPCC Coordinator periodically review the Oil SPCC Plan and understand their assigned responsibilities. The Coordinators are familiar with the preventative inspection and testing provisions of the Oil SPCC Plan, and are prepared to implement the emergency response provisions of the Plan in the event of an oil release.

5.5 DISPOSAL PROCEDURES

The Oil SPCC Coordinator will ensure that spilled oil and contaminated debris are recovered and properly managed. The Oil SPCC Coordinator will determine what, if any, outside assistance is needed, identify applicable federal, state, and local regulatory requirements, and then select one or more of the following waste cleanup/management options:

- Product Recovery - Whenever feasible, spilled and contained oil will be returned to its original container. The Oil SPCC Coordinator will ensure all container leaks and punctures are repaired first, or utilize a new container if appropriate.
- Off-Site Disposal - Released product that cannot be reused must be declared waste. Liquids absorbed by solid materials shall be shoveled into open top, 55-gallon drums. When drums are filled after a cleanup, the drum lids shall be secured and the drums shall be appropriately labeled identifying the substance(s) (i.e., waste oil), the hazard of the material (i.e. ignitable), the date of the spill/cleanup, and the location of the spill. The Oil SPCC Coordinator will coordinate the transport and disposal of the waste materials at an appropriately licensed off-site facility.

6. OIL SPILL NOTIFICATION PROCEDURES

This chapter describes how MGA-Eastman notifies federal, state, and local agencies regarding reportable releases at or from the campus, and satisfies the requirements of 40 C.F.R. § 112.7(a)(3)(vi) and (a)(4). The Oil SPCC Coordinator, or his/her designee, is responsible for reporting oil releases to Georgia EPD and/or USEPA, as required

6.1 OIL RELEASES TO WATER

If oil is discharged[3] to waters of the state (including streams, rivers, storm sewers, and drainage ditches), the Oil SPCC Coordinator or his/her designee will immediately report the incident to:

- Georgia EPD, Emergency Response (800) 241-4113
  (24-Hour Statewide Number to Report a Spill of Oil or Hazardous Material)
- USEPA Region 4 (24-Hour Spill Reporting Number) (404) 562-8700
- National Response Center (NRC) (800) 424-8802

When calling the Georgia EPD, USEPA, and the NRC to report an incident, the Oil SPCC Coordinator will need to provide the following information:

- Name and telephone number of caller;
- Location of release or threat;
- Date and time release occurred;
- Name of oil(s) released or of which there is a threat of release;
- Approximate quantity of oil(s) released or of which there is a threat of release;
- Source of release or threat of release;
- Brief description of the release;
- Name and telephone number of owner/operator of the site where the release occurred or at which there is a threat of release;
- Name and telephone number of the contact person where the release occurred or at which there is a threat of release;
- A description of the response actions taken or proposed to address the release or threat of release;
- Names of other federal, state, or local government agencies that have been notified and/or have responded to the release or threat of release; and
- Any other information that is relevant to assessing the degree of hazard posed by the release or threat of release of oil.

[3] For the purposes of this notification, "discharge" refers to the definition as found in 40 C.F.R. Part 110, which is a *harmful quantity* of spilled oil which results in:
1) Violation of applicable water-quality standards;
2) Production of a film, sheen or discoloration on the water surface or adjoining shoreline; or
3) Deposition of a sludge or emulsion beneath the water surface or upon the adjoining shoreline.

Note that spills of hazardous materials other than oil, or releases of oil that do not meet the above criteria may also require reporting to the Georgia EPD. Because the rules are complex, in the event of any spill or oil or hazardous materials, MGA-Eastman personnel should notify the Oil SPCC Coordinator or his/her designee for determination of whether additional reporting or actions are required.

6.2 WRITTEN NOTIFICATION FOR OIL SPILLS

If the Emergency Response Program On-Scene Coordinator from Georgia EPD requests a Release and Remediation Report, the report must be submitted no later than thirty (30) days after completion of the emergency response activities. A copy of a Release and Remediation Report is included in Appendix F. It is the responsibility of the Oil SPCC Coordinator to ensure that the proper notifications are made.

In addition, MGA-Eastman must make written notification to the USEPA whenever the Facility has:

- Discharged more than 1,000 gallons of oil in a single discharge event, or
- Discharged more than 42 gallons (1 barrel) of oil in each of two discharge events to the navigable waters[4] of the United States or adjoining shorelines within any twelve-month period.

If either of the above criteria are met, MGA-Eastman must file a written report within 60 days with the Regional Administrator of the USEPA. It is the responsibility of the Oil SPCC Coordinator to ensure that the proper notifications are made. In accordance with 40 C.F.R. § 112.4(a), this report will contain the following information:

- Facility name and location.
- Name of the person reporting the event.
- Date, time, and place of release.
- Names, addresses, and telephone numbers of all persons potentially responsible for or liable for the release.
- Maximum storage or handling capacity of the Facility and normal daily throughput.
- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements (including any third-party damages and costs of containment and removal operations).
- Description of the Facility including maps, flow diagrams, and topographical maps, as necessary.
- The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred, and the amount and type of material released.
- Additional preventative measures taken or contemplated to minimize the possibility of recurrence.
- Such other information as the authorities may reasonably require pertinent to the Oil SPCC Plan or discharge.

Information submitted to the Regional SPCC/FRP Coordinator must be sent to:

USEPA, Region 4
61 Forsyth Street
Atlanta, Georgia 30365-3415

[4] The definition of "navigable waters" is complex and subject to interpretation. The Oil SPCC coordinator should coordinate with technical consultants or legal counsel in the event he or she is uncertain whether a release to "navigable waters" has occurred.

Table 6-1: Emergency Contact Phone Numbers

MGA-Eastman	Oil SPCC Coordinator EHS Director	 Office Phone: (478) 934-3054
	Alternate Oil SPCC Coordinators Coordinator of Plant Maintenance	 Office Phone: (478) 374-6707
	MGA Aviation Campus Police Telephone Number	(478) 374-6403
Local Agencies	Eastman Fire Department (Emergency)	911
	(Non-Emergency)	(478) 374-3431
	Eastman Police Department (Emergency)	911
	(Non-Emergency)	(478) 374-7788
	Dodge County Board of Health	(478) 374-5576
	Dodge County Hospital	(478) 448-4000
State Agencies	Georgia EPD 24 Hour Spill Hotline	(800) 241-4113
Federal Agencies	EPA Region IV 24-Hour Spill Reporting Number	(404) 562-8700
	National Response Center (NRC)	(800) 424-8802
Response Contractors	MKC Enterprises	(800) 457-6521 (770) 457-1341 www.mkcenterprises.com

7. EMPLOYEE TRAINING PROGRAMS

This chapter describes the Oil SPCC training and discharge prevention briefings that MGA-Eastman provides to its oil-handling employees, as required by 40 C.F.R. § 112.7(f).

7.1 OIL SPCC TRAINING

MGA-Eastman provides Oil SPCC training to all oil-handling employees and those who play a role in the implementation of this Plan. The MGA-Eastman Oil SPCC training program instructs employees involved with the handling of oil and/or oil containment devices, structures, and equipment on:

- Contents of the Oil SPCC Plan;
- The proper operation and maintenance of equipment to prevent discharges and general facility operations;
- Oil discharge procedures, including notification and use of available spill equipment;
- Instructions regarding applicable oil pollution control laws, rules, and regulations; and
- Instructions regarding regular tank inspection procedures.

Oil SPCC training is provided to all new oil-handling employees. Oil SPCC training records are maintained with this Plan by the Oil SPCC Coordinator.

7.2 DISCHARGE PREVENTION BRIEFINGS

MGA-Eastman conducts discharge prevention briefings at least annually covering the following topics for oil-handling personnel:

- *Oil SPCC Plan Update* – discuss any Plan changes to ensure that oil-handling employees have an up to date understanding of the Oil SPCC operations.
- *Discharges* – highlight and describe discharges that have occurred in the past year; discuss response actions; effectiveness of oil spill response and equipment; describe actions taken to prevent recurrence.
- *Failures and Malfunctioning Components* – discuss any known equipment failures or malfunctioning components related to oil storage.
- *Precautionary Measures* – brainstorm current or new precautionary measures to prevent oil releases.

Records of Discharge Prevention Briefings are maintained with this Plan by the Oil SPCC Coordinator.

40 C.F.R. § 112.7(f)(3).

8. SECURITY

This chapter describes the routine and emergency security measures that MGA-Eastman implements for the facility and oil storage locations. This chapter meets the requirements of 40 C.F.R. § 112.7(g).

8.1 ROUTINE SECURITY MEASURES

Several routine security measures are in place to ensure the safety of people and the security of property.

- Campus Security Officers are on duty seven days a week for 24 hours each day;
- All areas of the campus contain adequate lighting to facilitate the discovery of visible oil spills, discourage vandalism, and for safety.

8.2 SECURITY DURING EMERGENCIES

During an emergency, access to the facility would be controlled to the extent possible, and only emergency response and other authorized responders (e.g., municipal responders, approved contractors, and regulatory authorities) would be allowed access to the emergency area. Communication during an emergency, such as a large oil release, would be controlled through the Security Office, with direct access to all MGA-Eastman telephone lines, cell phone lines, and two-way radio communications. The Oil SPCC Coordinator will be the primary liaison with emergency response agencies.

Upon notification that an oil release has occurred, the Oil SPCC Coordinator (or his/her designee) will designate certain employees to assist with perimeter security while the incident is assessed. For major incidents, designated employees will immediately restrict facility access to only essential emergency response personnel until such time as local authorities (e.g., Fire Department or Police) assume control of the scene. These steps will facilitate an organized and efficient response to an oil release.

8.3 SECURITY FOR OIL STORAGE FACILITIES

ASTs and containers are located in locked or secured areas with restricted access. Only authorized facility personnel have the proper keys to access these storage areas. The fill ports are capped and secured with pad locks when not in use, helping to prevent outside access to the fill ports and vandalism. All hydraulic elevator reservoirs are located in locked rooms.

APPENDIX A: CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

FACILITY NAME: Middle Georgia State University - Eastman Campus

FACILITY ADDRESS: 71 Airport Road, Eastman, Georgia 31023

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   Yes:_____ No: X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes:_____ No: X

3. Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments.

   Yes:_____ No: X

4. Does the facility have a total oil storage capacity of greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

   Yes:_____ No: X

5. Does the facility have a total oil storage capacity greater than or equal to one 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 five years?

   Yes:_____ No: X

CERTIFICATION

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

Print Name

Signature

Date

APPENDIX B: MONTHLY INSPECTION FORMS

MONTHLY VISUAL INSPECTION REPORT FOR ABOVEGROUND TANKS

Inspection Parameters	Tank Descriptions					
	Refueler Trucks	Trailer Mounted Fuel Tank	200-Gallon Waste Fuel and Oil Tanks	Olympian Generator Tank	Portable Ground Power Unit	Ultracept Collection Tank
Are all tank openings properly sealed and secured (e.g., fill port, drain valve, drum head, and bung)?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Are there drip marks, leaks, or signs of discoloration on the tank?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Are there signs of corrosion, cracking, dents, or areas of wear on the tank?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Are there signs of seepage of stored materials on the piping, valves or seals?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Is the tank level gauge readable and in good working condition?	Y / N	Y / N		Y / N	Y / N	
Is there evidence of leakage on the ground in or around the secondary containment?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Are spill containment and cleanup supplies available and adequately stocked?	Y / N	Y / N	Y / N	Y / N	Y / N	Y / N
Comments/Deficiencies:						

Date:_____/_____/_____ Inspector Signature:_____

APPENDIX C: INSPECTION AND TESTING RECORDS

APPENDIX D: OIL SPCC TRAINING PROGRAM AND TRAINING RECORDS

OIL SPCC PLAN IMPLEMENTATION TRAINING

Date of Training:		
Conducted by:		
Attendees:		
Name	Signature	Job Title

APPENDIX E: ANNUAL DISCHARGE PREVENTION BRIEFING RECORDS

ANNUAL DISCHARGE PREVENTION BRIEFING

Date of Briefing:			
Conducted by:			
Topics Covered:			
Attendees:			
Name		Signature	Job Title

APPENDIX F: GEORGIA ENVIRONMENTAL PROTECTION DIVISION RELEASE NOTIFICATION FORM

CAN BE FOUND HERE:

HTTPS://WWW.GOOGLE.COM/?GWS_RD=SSL#Q=GEORGIA+ENVIRONMENTAL+PROTECTION+DIVISION+RELEASE+NOTIFICATION+FORM