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# 1.0 Introduction

## 1.1 Agency Statement

The Bridgewater State College Facility, in Bridgewater, Massachusetts (BSC), will operate its facility in compliance with the rules and regulations applicable to its site-specific operations and activities as outlined in this plan. BSC will operate in an efficient and environmentally safe manner and will take reasonable measures to prevent oil spills from occurring. If an oil spill should occur, BSC will take reasonable actions to contain the oil spill and prevent the oil spill from reaching and discharging into or upon the navigable waters of the United States or adjoining shorelines as defined in Title 40 Code of Federal Regulations (CFR) Part 112. The signature contained herewith designates BSC's approval of this Spill Prevention Control and Countermeasure Plan prepared pursuant to 40 CFR Part 112 and indicates that this plan will be implemented as herein described.

Name: _____

Title: _____

Signature: _____

Date: _____

This SPCC Plan is intended to be used in conjunction with other BSC policies and procedures, to the extent applicable. Each of the members of the oil spill prevention team (refer to Section 5.2.1 of this plan) has access to an updated copy of this SPCC Plan, which shall be kept by the SPCC Emergency Coordinator. In addition, as required, copies of the plan shall be available at the facility for review by the United States Environmental Protection Agency ("EPA") and the Massachusetts Department of Environmental Protection ("DEP"), if requested.

The BSC facility does not meet the substantial harm criteria listed in Appendix C, Attachment C-I of the 40 CFR Part 112, therefore, BSC has completed the "Certification of the Applicability of the Substantial Harm Criteria" form, which is included as Appendix C of this SPCC plan and maintained at the BSC facility.

## 1.2 Certification

**Professional Engineer Certification**

I hereby certify that, being familiar with the provisions of 40 CFR 112 - Oil Pollution Prevention and that the agent indicated below has visited the site and prepared this SPCC Plan, I attest that the SPCC requirements have been met and that the SPCC Plan has been prepared in accordance with good engineering practices, including consideration of standard industry practice, and with the requirements of 40 CFR 112. This certification in no way relieves the owner/operator of the facility of the duty to fully implement the plan.

**Signature and Seal of Registered Professional Engineer**

Name: Christopher R. McDermott, P.E.
Registration Number: 10812
State: New Hampshire
Date: November 6, 2007

Signature:_____

Seal:_____

# 2.0 Facility Description

BSC opened in the year 1840 at Bridgewater Town hall. The college now enrolls more than 8,000 full-time and part-time students, has a full-time faculty of more than 260 professors and instructors, and employs an overall staff of approximately 565. Approximately 2,200 residents live on BSC campus. The BSC campus features 30 academic and residential buildings located on 240 acres of land.

BSC's facilities include a steam plant, a maintenance garage, and a vehicle refueling station, 15 emergency generators, and 5 irrigation wells. In addition, the campus features a library, a science center, a student activities complex, a dining commons, a health services unit, a campus police department, dormitories, and athletic facilities. A Massachusetts Bay Transit Authority ("MBTA") commuter railway transects the campus and an MBTA station is located at the eastern portion of the campus. Several acres of paved parking lots, including MBTA commuter parking, exist at BSC. The John Joseph Moakley Center for Technological Application (built in 1995) serves as an information technology and computing resource center. The campus also has approximately 43 laboratories. The Burnell Campus School, located on the BSC campus, is currently used as a Town of Bridgewater Public School and School of Education.

A site location map and site plan showing the principal buildings on the campus is included in Appendix A of this plan.

**Table 1 Facility Information**

| | |
|---|---|
| Facility Type: | Educational Facility |
| Contact/Person in Charge at the facility: | Director of Facilities (508) 531-1399 |
| SPCC Emergency Coordinator: | EHS Officer (508) 531-2750 |
| Copy of SPCC plan to be on file at: | EHS Office |
| Facility Site Plan: | Appendix A of SPCC Plan |

# 3.0 Oil Storage Capacity

The following sections describe the storage of oils and fuels at the site as well as some of the spill control measures in place. Section 5.0 elaborates on the prevention, control, and countermeasure procedures as they pertain to oil storage.

## 3.1 Underground Storage Tanks

Table 2 provides a description of the contents, size and material of construction of the underground storage tanks (USTs) at the Facility.

**Table 2 Underground Storage Tanks**

| Location/Identification | Contents | Size (gallons) | Material of Construction |
|---|---|---|---|
| Central Heating Plant-Boiler (1) | #6 Fuel Oil | 30,000 | steel |
| Central Heating Plant-Boiler (2) | #6 Fuel Oil | 30,000 | steel |
| Central Heating Plant-Boiler (3) | #6 Fuel Oil | 30,000 | steel |
| Central Heating Plant-Boiler (4) | #6 Fuel Oil | 30,000 | steel |
| Central Heating Plant-Generator | Diesel Fuel | 1,000 | steel |
| Conant Science Building | Diesel Fuel | 1,000 | steel |
| Operations Building | Unleaded Gasoline | 5,000 | fiberglass |
| Operations Building | Diesel Fuel | 5,000 | fiberglass |

## 3.2 Aboveground Storage Tanks

Table 3 provides a description of the contents, size and material of construction of the aboveground storage tanks (ASTS) at the Facility.

**Table 3 Aboveground Storage Tanks**

| Tank/Location | Contents | Size (gallons) | Material of Construction |
|---|---|---|---|
| Kelly Gymnasium | Diesel Fuel | 300 | steel |
| Satellite Farm/ Observatory | Diesel Fuel | 200 | steel |
| Boyden Hall | Diesel Fuel | 300 | steel |
| Maxwell Library | Diesel Fuel | 300 | steel |
| Scott Hall | Diesel Fuel | 300 | steel |
| Woodward Hall | Diesel Fuel | 300 | steel |
| Great Hill Apartments | Diesel Fuel | 300 | steel |
| Shea/ Durgin Hall | Diesel Fuel | 300 | steel |
| Pope Hall | Diesel Fuel | 300 | steel |
| Burnell School | Diesel Fuel | 500 | steel |
| Tinsley Center | Diesel Fuel | 300 | steel |
| East Hal | Diesel Fuel | 200 | steel |
| East Campus Commons | Diesel Fuel | 200 | steel |
| Harrington Hall | Diesel Fuel | 200 | steel |
| Operations Building | Diesel Fuel | 300 | steel |
| New Residence Hall | Diesel Fuel | 500 | steel |

## 3.3 Miscellaneous Oil Storage

Various oils and waste oils are stored in drums and smaller containers at the point of use within the facility including;

- Oil-filled electrical transformers are found at fifteen locations around the campus: Central Heating Plant, Kelly Gymnasium, Pope Hall, Scott Hall, Tillinghast Hall, Moakley Technology Center, Burnell School, Miles/Dinardo Hall, Great Hill Apartments, Observatory/Satellite Farm, Harrington Hall, Tinsley Center, East Hall, East Campus Commons and the Operations Building.

- Drum storage areas are located in the Operations Building and at the Central Heating Plant.
- Hydraulic elevators with oil reservoirs are at twelve locations around the campus: Dinardo Hall, Miles Hall, Rondileau Campus Center, Maxwell Library, Art Center, Boyden Hall, Harrington Hall, Moakley Technology Center, Tinsley Center, Operations Building, East Hall and Woodward Hall.

# 4.0 Spill Estimates and Pathways

This section describes the potential quantities of oil that could be released under assumed worst-case scenarios. These scenarios do not necessarily reflect the probable occurrence of such events. Please refer to the schematic of the BSC facility available in Appendix A of this report.

## 4.1 Facility Drainage

Stormwater from the facility is collected by a series of catch basins located across the property. The drainage areas eventually flow into the Taunton River located approximately 2 miles northeast of the facility. Each drainage area is delineated by a dashed line as presented on the Site Map included in Appendix A and described below.

## 4.2 Underground Storage Tanks

**Northwest Wall of the Central Heating Plant.** The Central Heating Plant boilers are serviced by four 30,000-gallon USTs. These tanks are approximately 46 ½ feet long and have a diameter of approximately 10 feet. The tanks are of double-walled steel construction and are used for the storage of #6 fuel oil. The tanks were installed in 1999 off the northwest wall of the Central Heating Plant (No. 17 on the Site Plan). These USTs were reportedly installed in compliance with 40 CFR Part 280 (1998 UST Standards) and the Massachusetts State Fire Code – 527 CMR 9.00 "Tanks and Containers". Required notification certifying tank installation was submitted to the Massachusetts State Fire Marshall.

The tanks provide fuel for the boilers supplying steam to the west side of the campus. The associated piping is 4 inches in diameter with 2-inch diameter suction return lines. Each of the USTs is equipped with a 15-gallon capacity overfill sump. All of the buried piping is insulated and encased in fiberglass-reinforced plastic ("FRP") pipe sleeves. The tanks are equipped with internal pendant heating coils.

Leakage from a defective coil is controlled by monitoring the steam return and exhaust lines for contamination. For containment of releases occurring during filling operations, the filling area itself is a containment vessel with a capacity of 8,500 gallons. A catch basin located in the filling area is equipped with a valve, which must be closed prior to filling operations.

Potential Spill Pathways(s)
Oil spills could potentially occur if the fuel oil USTs and/or associated piping ruptured, during loading/off loading procedures. The maximum quantity of oil that could potentially be released from each tank would be 30,000 gallons, or 8,500 gallons if the entire tanker load spilled during loading operations. A deterioration of the heating coils located within the UST's could also potentially lead to the introduction of #6 fuel oil into the steam lines. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfills. In such an event, a small spill would pool on the pavement adjacent to the fill pipe. A major spill would flow towards the valved catch basin in the fill area. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility. Since #6 fuel oil is relatively viscous, it does not have a tendency to flow very far unless it is heated; therefore incidental spills could be readily contained.

**Southwest Wall of the Central Heating Plant.** The Central Heating Plant emergency generator is fueled by diesel fuel which is stored in a 1,000-gallon double-walled steel UST. The tank is coated double-walled steel and was installed in 1990 off the southwest wall of the Central Heating Plant (No. 17 on the Site Plan). The tank is used to store fuel to run the emergency generator located inside the plant. The tank is equipped with interstitial monitoring and cathodic protection and fitted with spill containment along with an automatic gauging system. The underground portion of the piping is equipped with automatic leak detection and cathodic protection.

Potential Spill Pathways(s)
Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. The maximum quantity of oil that could potentially be released from the tank would be 1,000 gallons, or 3,500 gallons if the entire tanker load spilled during loading operations.

More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the pavement adjacent to the fill pipe. A major spill would flow southeast towards a catch basin connected to the storm sewer located approximately 25 feet from the UST. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Southwest Wall of the Conant Science Building.** The Conant Science Building's emergency generator is served by one 1,000-gallon UST containing diesel fuel. The tank is coated double-walled steel and was installed in 1990 off the southwest wall of the Conant Science Building (No. 12 on the Site Plan). The tank is used to store fuel to run the emergency generator located inside the building. The tank is equipped with interstitial monitoring and cathodic protection and fitted with spill containment along with an automatic gauging system. The underground portion of the piping is equipped with automatic leak detection and cathodic protection.

Potential Spill Pathway(s)
Oil spills could potentially occur if the UST and/or associated piping ruptured, during loading/offloading procedures. The maximum quantity of oil that could potentially be released from the tank would be 1,000 gallons, or 3,500 gallons if the entire tanker load spilled during loading operations. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill.

In such an event, a small spill would pool on the pavement adjacent to the fill pipe. A major spill would flow northwest down Park Avenue towards a catch basin connected to the storm sewer located approximately 130 feet from the UST. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows in the Taunton River located approximately 2 miles northeast of the facility.

**Operations Building Parking Lot.** The Operations Building is equipped with a refueling area for BSC vehicles. BSC owned vehicles are refueled at the maintenance building utilizing either the 5,000-gallon UST for unleaded gasoline or the 5,000-gallon UST for diesel fuel.

The USTs are located beneath the parking lot in front of the Operations Building (No. 34 on the Site Plan) off the south wall. Both tanks were installed in 2002 and are double-walled fiberglass construction. The tanks are equipped with interstitial monitoring, automatic leak detection and fitted with spill containment along with an automatic gauging system. The associated piping is constructed of double-walled steel. The underground portion of the piping is equipped with automatic leak detection and cathodic protection. These USTs were reportedly installed in compliance with 40 CFR Part 280 (1998 UST Standards) and the Massachusetts State Fire Code – 527 CMR 9.00 "Tanks and Containers". Required notification certifying tank installation was submitted to the Massachusetts State Fire Marshall. The tanks are also equipped with two dispensing pumps set on a concrete pad.

[Note: The refueling area was previously located at the Maintenance Building. In 2003, BSC relocated the refueling area to the Operations Building and removed the USTs located at the Maintenance Building]

Potential Spill Pathway(s)
Oil spills could potentially occur by overfilling of vehicles or equipment or if the tanks and/or associated piping ruptured during loading/offloading procedures. The maximum quantity of petroleum that could potentially be released from the tank would be 5,000 gallons, or 8,500 gallons if the entire tanker load spilled during loading operations. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the pavement adjacent to the furl dispenser fill pipe and accumulate within the ridges of the concrete pad.

A major spill would flow south towards the storm drain (equipped with an oil water separator), which discharges to a holding pond/wetland area and eventually to the Taunton River.

## 4.3 Aboveground Storage Tanks

**Operations Building – Outdoor AST.** The Operations Building is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located off the southwest wall of the building. The tank was installed in 2002 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill which would pool on the concrete adjacent to the fill pipe. In such an event, a small spill would pool on the pavement and accumulate within the ridges of the concrete pad. A major spill would flow south towards the storm drain (equipped with an oil water separator), which discharges to a holding pond/wetland area and eventually to the Taunton River.

**Great Hill Apartments – Outdoor AST.** The Great Hill Apartments are equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located off the northwest wall of the building, underneath a shingled roof (No. 29 on the Site Plan). The tank was installed in 1998 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill which would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the northwest across the parking lot to a catch basin fitted with a hood approximately 80 feet away. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Pope Hall Dormitory – Outdoor AST.** The Pope Hall dormitory is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located off the east side of the building, inside the "U" formed by the structure (No. 10 on the Site Plan). The tank was installed in 1998 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the east across the grassy area adjacent to the generator pad to a catch basin located approximately 80 feet away. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Burnell School – Outdoor AST.** The Burnell School is equipped with an emergency generator powered by 500-gallon diesel fuel AST. The AST for the generator is located off the southwest corner of the building, inside a locked chain-link enclosure (No. 22 on the Site Plan). The tank was installed in 1999 and is of double-walled steel construction encased in concrete with a monitoring system and single wall piping.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 500 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment.

Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the south and southwest towards a leaching catch basin located approximately 50 feet away (flowing to a low lying storm sewer wetland and eventually to the Taunton River).

**Kelly Gymnasium – Outdoor AST.** The Kelly Gymnasium is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located in the base of the generator and is rectangular in shape. The generator is located off the northeast wall of the gymnasium (No. 14 on the Site Plan). The tank-mounted generator was installed in 1990.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur, it would generally flow off the slightly elevated area that the tank is located on and would follow the side of Kelly Drive adjacent to the playing field, and would then flow generally to the northeast towards the railroad tracks to an open wetland area and eventually flow into the Taunton River located approximately 2 miles northeast of the facility.

**Satellite Farm/Observatory – Outdoor AST.** The Satellite Farm is equipped with an emergency generator powered by diesel fuel, which is stored in a 200-gallon double-wall steel AST. The AST for the generator is located in the base of the generator and is rectangular in shape. The generator is located in a locked enclosure at the satellite farm (No. 39 on the Site Plan). The tank was installed in 1995 and is equipped with a welded steel containment unit. The enclosure is an unpaved area with a gravel surface.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 200 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill.

In such an event, a small spill would pool on the ground adjacent to the fill pipe. If a major spill were to occur, it would generally flow over natural ground to the north toward the low areas and wetlands forming the boundaries of the immediate area.

**Boyden Hall – Outdoor AST.** Boyden Hall is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located in the base of the generator and is rectangular in shape. The generator is located in a locked enclosure at Boyden Hall. The tank was installed in 2004 and is equipped with a welded steel containment unit. The enclosure is on a concrete pad.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill.

In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the northwest across the parking lot to a catch basin fitted with a hood. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Maxwell Library – Outdoor AST.** Maxwell Library is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located in the base of the generator and is rectangular in shape. The generator is located in a locked enclosure at Maxwell Library. The tank was installed in 2004 and is equipped with a welded steel containment unit. The enclosure is on a concrete pad.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill.

In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the southwest across the parking lot to a catch basin fitted with a hood. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Scott Hall – Outdoor AST.** The Scott Hall dormitory is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is located off the south wall of the building between it and Grove Street (No. 8 on the Site Plan). The tank was installed in 1998 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations.

Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur, it would generally flow to the northeast over natural ground towards the storm drain in the paved parking area adjacent to the dormitory or to the storm drain in the roadway. Both systems eventually flow into the Taunton River located approximately 2 miles northeast of the faculty.

**Woodward Hall – Outdoor AST.** The Woodward Hall dormitory is equipped with an emergency generator powered by diesel fuel, which is stored in a 200-gallon double-wall steel AST. The AST for the generator is located off the south wall of the dormitory (No. 7 on the Site Plan). The tank was installed in 2001 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 200 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spill would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedure. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur, it would generally flow to the north towards a catch basin located approximately 35 feet away. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Tinsley Center – Outdoor AST.** The Tinsley Center is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST.

The AST for the generator is located off the southeast wall of the building (No. 35 on the Site Plan). The tank was installed in 2001 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. If a major spill were to occur it would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the southeast across the parking lot to a catch basin fitted with a hood. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**East Hall – Outdoor AST.** East Hall is equipped with an emergency generator powered by diesel fuel, which is stored in a 200-gallon double-wall steel AST. The AST for the generator is located off the northwest wall of the building, underneath a shingled roof (No. 33 on the Site Plan). The tank was installed in 2001 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 200 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures.

More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. If a major spill were to occur it would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the northwest across the parking lot to a catch basin fitted with a hood. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**East Campus Commons – Outdoor AST.** East Campus Commons is equipped with an emergency generator powered by diesel fuel, which is stored in a 200-gallon double-wall steel AST. The AST for the generator is located off the northwest wall of the building, underneath a shingled roof (No. 32 on the Site Plan). The tank was installed in 2001 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 200 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. If a major spill were to occur it would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow generally to the northwest across the parking lot to a catch basin fitted with a hood. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Harrington Hall – Outdoor AST.** Harrington Hall is equipped with an emergency generator powered by diesel fuel, which is stored in a 200-gallon double-wall steel AST. The AST for the generator is located off the south wall of the dormitory (No. 3 on the Site Plan). The tank was installed in 2001 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 200 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spill would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedure. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur, it would generally flow to the south towards a catch basin. This storm sewer flows generally to the northeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**Shea/Durgin Hall - Indoor AST.** The Shea/Durgin Hall dormitory is equipped with an emergency generator powered by diesel fuel, which is stored in a 300-gallon double-wall steel AST. The AST for the generator is inside the building in a mechanical room (No. 27/28 on the Site Plan). The tank was installed in 1998 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Spill Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 300 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spill could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons of oil from the hose or tank overfill. In such an event, a small spill would pool on the concrete adjacent to the fill pipe. If a major spill were to occur it would flow across the floor of the mechanical room to a depressed area next to the boilers and into floor drains in that area that lead to the storm drain system.

If the spill occurred outside the building during filling operations, small spills would pool on the pavement near the fill cap. Larger outside spills would flow across the parking lot into a catch basin, which connects with the storm drain system. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

**New Residence Hall – Outdoor AST.** The new residence hall is equipped with an emergency generator powered by diesel fuel, which is stored in a 500-gallon double-wall steel AST. The AST and generator are a self-contained unit, and located off the northeast wall of the building (No. 40 on the Site Plan). The tank was installed in 2007 and is of double-walled construction with overfill protection. The tank is also equipped with interstitial monitoring and secondary containment. The associated piping is of single-walled steel construction.

Potential Still Pathway(s)
Diesel fuel spills could potentially occur if the AST ruptured and/or during loading or offloading procedures. The maximum quantity of diesel fuel that could potentially be released from the tank would be 500 gallons if the tank and secondary containment catastrophically ruptured or 3,500 gallons if the entire delivery tanker load spilled during loading operations. Generally, spills would not be released beyond the secondary containment. Oil spills could potentially occur if the fuel oil tanks and/or associated piping ruptured, during loading/offloading procedures. More likely, however, would be spillage of a much smaller volume (*e.g.* less than 10 gallons) of oil from the hose or tank overfill. If a major spill were to occur it would pool in the self contained unit, eventually leaking out of the unit. It would then flow generally to the northeast across pavement to a double catch basin. This storm sewer flows in underground piping in a northeast direction and eventually flows into the Town River located approximately 2 miles northeast of the facility.

## 4.4 Drummed Oil Storage Areas

Drums containing oil and other liquid materials are stored in two locations on the campus. The first is located in the Operations Building and the second is located in the Central Heating. Approximately 2 drums of oil are stored at each of the locations. The drums each have a capacity of 55 gallons and are constructed of steel.

Potential Spill Pathway(s)

Oil spills could potentially occur if the oil container(s) ruptured, and/or during loading/offloading procedures. Should one container rupture, the maximum potential oil release would be 55 gallons. The drums are situated on containment pallets, which should contain the spill. With the exception of one drum located in the boiler room of the Central Heating Plant that is not kept on containment pallet. Booms and absorbent material would be used to contain any additional overflow. For each of the drum storage locations, a likely spill pathway has been determined and is listed below.

- Operations Building – A release to the floor within this area could reach the floor drain system that is connected to an oil/water separator and discharges to the sewer system. Secondary containment in the form of a drum pallet, fiberglass drum container, and/or absorbent materials (pads or socks) are in place to contain a potential release.

- Central Heating Plant – Spills from the drums would migrate across towards the boiler room and the floor drains located there. This storm sewer flows generally to the southeast towards the railroad tracks where it flows into a drainage ditch that leads into a low lying wetland and eventually flows into the Taunton River located approximately 2 miles northeast of the facility.

## 4.5 Oil-Filled Electrical Units

Oil-filled electrical transformers are found at fifteen locations around the campus. These transformers are located at the Central Heating Plant, Kelly Gymnasium, Pope Hall, Scott Hall, Tillinghast Hall, Moakley Technology Center, Burnell School, Miles/Dinardo Hall, Great Hill Apartments, Observatory/Satellite Farm, Harrington Hall, Tinsley Center, East Hall, East Campus Commons and the Operations Building. The transformers serving Miles/Dinardo Hall, The Moakley Technology Center, The Burnell School, the Satellite Farm, Harrington Hall, Tinsley Center, East Hall, East Campus Commons, the Operations Building and the primary transformer at the Central Heating Plant are all located outside on concrete pads.

Potential Spill Pathway(s)
An oil spill could potentially occur if the unit and/or associated cooling coil ruptured and/or during an oil change. The maximum quantity of oil that could potentially be released would be 250 gallons. More likely, however, would be spillage of a much smaller volume (e.g. less than 10 gallons) of oil from an oil fill procedure or minor leak. For each of the transformer locations, a likely spill pathway has been determined and is listed below:

- Central Heating Plant - Spills occurring at the Central Heating Plant transformer would flow onto the concrete pad and into the natural soils around the pad.
- Kelly Gymnasium - Spills from the transformer would tend to pool on the floor near the transformer.
- Pope Hall - Spills from the transformer would tend to pool on the floor near the transformer.
- Scott Hall - Spills from the transformer would tend to pool on the floor near the transformer.
- Tillinghast Hall - Spills from the transformer would flow across the floor and be contained by a spill boom.
- Moakley Technology Center - Spills from this transformer would flow to a low point on the concrete pad.

- The Burnell School - Spills would flow generally to the south and southwest towards a leaching gallery located approximately 50 feet away.

- Miles/Dinardo Hall - Spills from the transformer could flow off the pad and be contained by a berm.

- Great Hill Apartment - Spills from the transformer would flow off the pad into the soil and possible across a parking lot to a grassy area.

- Observatory/Satellite Farm - Spills would tend to flow to the north towards the low areas and forming the boundaries of the immediate area.

- Harrington Hall - Spills occurring at the Harrington Hall transformer would flow onto the concrete pad and into the natural soils around the pad.

- Tinsely Center - Spills occurring at the Tinsely Center transformer would flow onto the concrete pad and into the natural soils around the pad.

- East Hall - Spills occurring at the East Hall transformer would flow onto the concrete pad and into the natural soils around the pad.

- East Campus Commons - Spills occurring at the East Campus Commons transformer would flow onto the concrete pad and into the natural soils around the pad.

- Operations Building - Spills occurring at the Operations Building transformer would flow off the pad and would tend to pool on the paved parking area.

- Woodward Hall – Spills occurring at the Woodward Hall transformer would flow off the pad and onto the soil.

## 4.6 Hydraulic Units

Twelve of the on campus buildings are serviced by hydraulic elevators.

These are: Dinardo Hall, Miles Hall; Rondileau Campus Center; Maxwell Library; Art Center; Boyden Hall; Harrington Hall; Moakley Technology Center; Tinsley Center; Operations Building, East Hall and Woodward Hall. In addition, a chairlift is located in the Kelly Gymnasium, and two hydraulic compactors are located in Shea/Durgin hall. The hydraulic units containing oil are used for passenger elevators, a chairlift, and two trash compactors. Each of the units is equipped with a 35-gallon oil reservoir that is constructed of steel. All of the units are serviced and maintained by an outside contractor.

Potential Spill Pathway(s)
The hydraulic units are located inside on-campus buildings; therefore spills would tend to pool on the floor within the building in the vicinity of the unit and would not impact any floor drains.

# 5.0 Spill Prevention, Controls, and Countermeasures

This section presents physical systems, procedures, and controls for prevention, control, and response to spills of oil based on the potential cause of the release.

## 5.1 Discharge Prevention Methods and Controls

The following is a description of the prevention and containment measures applying to the storage of oil in bulk tanks and transfer operations. Response measures are discussed in Section 4.2.

### 5.1.1 UST Spill Prevention and Containment Measures

The following spill prevention measures are implemented at the Facility. The preventive measures that require activities by the oil delivery company shall be incorporated as part of the delivery contract, and shall be coordinated with existing oil delivery contract vendors.

- BSC personnel monitor the product levels in the tanks on a weekly basis.

- BSC personnel conduct regular inspections and maintenance of the tanks and associated piping. (refer to Section 7.0).

- The USTs are double-walled with interstitial monitoring and equipped with a leak detection system that provides both an audible and visible alarm.

- Facility personnel perform daily inspections of areas where the tanks are present during routine site reconnaissance.

- Facility personnel are trained on how to retrieve information from the electronic system monitoring the daily tank level measurements and documentation of reconciliation of the diesel fuel and gasoline USTS.

- Facility personnel maintain documentation at the facility, which indicates that the cathodic protection is maintained and inspected on a monthly basis.

- An emergency spill containment drum is located inside Central Heating Plant, which includes booms, pads, and PPE necessary to perform standard spill containment activities. Additional absorbent booms and absorbent material are also stored in the Central Heating Plant.

### 5.1.2 AST Spill Prevention and Containment Measures

The following spill prevention measures are implemented at the Facility.

- BSC personnel perform daily inspections of AST Areas.

- Standard procedure requires routine weekly inspections of AST storage areas and examining them for evidence of spillage, staining, corrosion, damaged equipment, or damaged containers. An inspection form is used to document the weekly inspections. Damaged equipment or tank systems shall be repaired promptly and recorded on the inspection form. (refer to Section 7.0)

- An emergency spill containment drum is located inside the Maintenance Building as well as in the Central Heating Plant, which includes booms, pads, and PPE necessary to perform standard spill containment activities. Additional absorbent booms and absorbent material is also stored in the Central Heating Plant. Absorbent material is also available inside the utility room near the generator.

### 5.1.3 Tank Truck Unloading and Loading

The following tank truck unloading and loading measures are applicable to USTs as well as ASTs and include delivery of raw material and removal of waste materials.

- Prior to tank loading/offloading operations, the lowermost drain and all outlets of the vehicles shall be closely examined for leakage, and if necessary, adjustments shall be made to prevent liquid leakage while in transit.

- Prior to offloading, the driver of the oil delivery vehicle shall be required to report to facility personnel on-duty who will be present at all times during loading/offloading operations conducted by contractors.

- Standard procedure requires that the oil delivery trucks have automatic shut-off valves.

- During deliveries, the delivery truck operator should use dry shut-off valves or use a pail to catch drips when breaking hose connections.

- Catchbasins located within the vicinity of a fill port should be covered with catchbasin covers during filling and oil transfer operations.

- Facility personnel shall measure the liquid level of the fuel tank prior to ordering and again immediately prior to filling the tank.

- Only authorized facility personnel conduct transfers of waste oil into the waste oil drums.

### 5.1.4 Piping Networks

Piping networks associated with dispensing stations and piping going into and out of tanks are considered in this section.

- Piping for the AST systems are monitored visually for leaks and have been securely mounted.

- Contractors or BSC personnel unfamiliar with the facility should be verbally informed of the oil storage locations and associated piping systems.

### 5.1.5 Non-Bulk Material Transfers

Non-bulk material transfers include manual deliveries to storage locations throughout the facility. Temporary storage for drummed virgin or waste oils should be conducted within a containment area or at a minimum, provided with containment features such as a drum pallet, drum container or sorbent materials.

## 5.2 Discharge Countermeasures

### 5.2.1 Internal Spill Reporting Procedures

This section outlines the reporting procedures to be undertaken in the event of an oil spill. The SPCC Emergency Coordinator or the Alternate SPCC Emergency Coordinator should be called immediately to the scene of the oil spill. Emergency phone numbers will be strategically posted at telephones in maintenance areas and in the offices of the SPCC Emergency Coordinator and Alternate SPCC Emergency Coordinators.

BSC has designated the following BSC personnel to be responsible for spill prevention and emergency response relative to potential releases of oil.

**Table 4 Internal Emergency Numbers**

| Contact Name | Business Phone | Mobil Phone |
|---|---|---|
| SPCC Emergency Coordinator [Patricia Delaney, EHS Officer] | 508-531-2750 | 508-400-0417 |
| Alternate SPCC Emergency Coordinator [Keith McDonald, Director of Facilities] | 508-531-1399 | 508-989-4450 |

The SPCC Emergency Coordinator or designee shall be informed of the nature and location of the spill and will direct the resources of manpower and equipment for the spill response action. The SPCC Emergency Coordinator or designee shall remain in control for the duration of the response and have the authority to retain a spill contractor for the response effort.

BSC personnel will be knowledgeable of the location of the nearest communication system (i.e., telephone, cellular telephone, or walkie-talkie). Fuel delivery trucks equipped with a communication system are considered adequate means for emergency communication.

In addition to the above responsibilities, BSC has designated the following SPCC Team Members:

- Robert Drummond – Chief Engineer, Central Power Plant
- Bill Richards – Associate Director of Facilities
- Dave Tetrault – Assistant Chief Engineer

The SPCC Team has the following responsibilities:

- Identification and development of specific goals for continuous improvement to the facility SPCC program.

- Review and evaluation of changes to facility operations to determine potential impact and need for an update of this SPCC Plan.

- Communication with management to ensure a cooperative partnership.

### 5.2.2 External Spill Reporting Procedures

In the event of a spill, the SPCC Emergency Coordinator, or individual directed by the SPCC Emergency Coordinator, shall make the necessary contact with outside contractors and regulatory agencies to provide professional services for the reporting, removal and disposal of contaminated material. A spill of greater than 10-gallons of oil requires notification to the Massachusetts Department of Environmental Protection (DEP). An oil spill or a spill of any quantity that has reached a surface water, a sewer, storm drain, ditch, or culvert leading thereto, is immediately reportable, by law, to one or more municipal, state, or federal authorities.

The SPCC Emergency Coordinator is responsible for notification of reportable spills to the authorities and agencies listed below. In addition to the initial telephone contact, a written spill report to the DEP is also required.

Immediate Response Actions, if required, should be coordinated with a Licensed Site Professional pursuant to the Massachusetts Contingency Plan [310 CMR 40.0411(3)].

The following information should be provided when reporting a spill:

- Identity of the caller
- Contact phone number
- Location of the spill
- Type of product spilled
- Approximate quantity spilled
- Extent of actual and/or potential water pollution
- Date and time of spill
- Cause of spill

The following emergency contacts shall be summoned by telephone or directly in the event of a reportable spill that is either indoors or outdoors on the property. Emergency Contact Numbers shall be posted prominently at critical telephones located throughout the facility.

**Table 5** **External Emergency Numbers**

| Contact Name | Telephone Numbers |
|---|---|
| Massachusetts Department of Environmental Protection (DEP) | Daytime: (978) 661-7600<br>Emergency: (888) 304-1133 |
| U.S. Environmental Protection Agency (EPA) | Daytime: (888) 372-7341<br>Emergency: (800) 424-8802 |
| Bridgewater Fire Department | Daytime: (508) 697-0900<br>Emergency: 911 |
| United States Coast Guard (Marine Safety) | Emergency: (800) 673-1057 |
| National Response Center | Emergency: (800) 424-8802 |
| Bridgewater Police Department | Daytime: (508) 697-6118<br>Emergency: 911 |
| Hospital (if applicable)<br>Brockton Hospital | Daytime: (508) 941-7000<br>Emergency: 911 |
| Ambulance (if applicable) | Emergency: 911 |
| Bridgewater Health Department | Daytime: (508) 697-0903 |
| Bridgewater Water Department | Daytime: (508) 697-0910 |

### 5.2.3 Internal Spill Response and Cleanup

This section outlines the spill response and cleanup procedures to be undertaken in the event of an oil spill.

- Employees who detect a release will contact the SPCC Emergency Coordinator or the Alternate SPCC Emergency Coordinator identified in Section 5.2.1, Internal Spill Reporting Procedures.

- The SPCC Emergency Coordinator or Alternate shall be responsible for immediately contacting appropriate regulatory and emergency response agencies.

- If safe to do so, employees who detect a release and have received training in spill response procedures shall perform reasonable actions to safely stop the source of the release and shall use oil spill control equipment to prevent the spread of the spill.

- Temporary diking or absorbent material should be used to prevent migration of oil into floor drains, stormwater catch basins, or surface water. Stopping an oil spill and preventing an oil spill from migrating may involve shutting off equipment and applying spill absorbent materials to the oil spill.

Absorbent materials are located throughout the facility in the vicinity of oil storage areas. These spill kits should be monitored and restocked as needed. A spill kit should be located adjacent to storage areas.

### 5.2.4 Disposal of Spill Materials

Spills will be cleaned up using spill absorbent material. Salvage drums are maintained on-site for storage of spent absorbent materials. Spill residues, spent absorbent materials and contaminated debris will be drummed for off-site disposal. The outside contractor is responsible for proper collection, transport, and off-site disposal of oil contaminated materials in accordance with applicable regulations including the Massachusetts Hazardous Waste Management Regulations, 310 CMR 30.00.

# 6.0 Training Programs

BSC has developed and implemented an employee-training program relative to its SPCC program. The training program is designed to train personnel at all levels of responsibility relative to the components and goals of this SPCC Plan, and to develop a sensitivity to oil spill prevention and control concerns. Topics include oil spill prevention and response, good housekeeping, and oil storage management practices. This SPCC plan is the basis of the personnel-training program that has been developed for the facility. This training program shall be reviewed and, if appropriate, updated annually. BSC conducts annual training of personnel with roles and responsibilities relative to its SPCC program and implementation of BMP practices. Copies of the SPCC Employee Training Forms are maintained in Appendix E.

# 7.0 Inspections and Record Keeping

Work areas are visually inspected by BSC personnel daily. In addition, routine inspections of tanks, container storage and dispensing areas are conducted in accordance with BSC written procedures and maintained for three years by facility personnel. The following inspection procedures and practices are implemented at the facility to support spill prevention activities:

- At a minimum, drum storage areas are inspected on a monthly basis. The waste accumulation and storage areas are inspected weekly and maintained in a manner, consistent with Massachusetts regulations 310 CMR 30.0000. Drum storage areas are inspected for visible leakage in the vicinity, and container condition.

The results of these monthly inspections are recorded and filed. Should the inspection reveal that follow up actions(s) necessary, the follow up actions will be completed and noted on the inspection forms. Examples of inspection and maintenance forms are included in Appendix D. Drums shall remain closed when personnel are not removing or adding product.

- Inspection of the oil filled transformers occurs monthly. Additional inspection and maintenance of the transformers shall be conducted on an as need basis by an outside contractor.

- Elevator inspection and maintenance is performed by outside contractors: the Delta Beckwith Elevator Company, Access and Mobility and Wilco.

- Inspection and maintenance of aboveground storage tanks include procedures recommended by the manufacturer and installers of the system components, and applicable portions of the inspection and maintenance information included in Appendix D of this plan.

- Inspection and maintenance of underground storage tanks include procedures recommended by the manufacturer and installers of the system components, and applicable portions of Massachusetts' regulations 527 CMR 9.00. In addition, BSC shall observe applicable portions of the inspection and maintenance information included in Appendix D of this plan.

- The supply of oil-absorbent materials and spill response equipment is regularly checked to help ensure appropriate response equipment is available should a spill incident occur.

- Inspection results are recorded and filed. Should the inspection reveal that follow up actions(s) necessary, the follow up actions will be completed and noted on the inspection forms. Examples of inspection and maintenance forms are included in Appendix D.

## 8.0 Site Security

BSC employs its own police force and security personnel who are responsible for ensuring that unauthorized personnel do not access the BSC property. BSC also maintains the following security measures:

- The utility rooms are locked when not in use.

- The Central Heating Plant is manned continuously to prevent unauthorized access.

- The Maintenance Building is locked when not occupied.

- Padlocked, chain-link fences are utilized to enclose exterior aboveground storage tanks.

- All petroleum storage tank loading/offloading connections are capped or blank flanged when not in service or in the standby position.
- BSC personnel supervise all filling operations of petroleum tanks.
- Lighting in the vicinity of tank storage areas is properly maintained.
- BSC personnel lock the mechanical room when not in use.
- The complete area of the Satellite Farm is enclosed by a locked chain-link fence and is equipped with a security with a security alarm system.
- The fuel dispensing pumps are located at the Operations Building, which houses the Campus Police. The Campus Police monitor security at the Operations Building 24/7. In addition, access to the fuel pumps is controlled by a code system for security. Authorized employees are provided with a dispensing code that is tied to their employee number and the vehicle number.

# 9.0 Aboveground Container Repair

The facility will evaluate aboveground storage containers for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take the appropriate action, prior to container repair, alteration, reconstruction or change in service.

# 10.0 Regulatory Cross-Reference

The following section cross-references the location of the requirements listed in the 40 CFR Part 112.7 (General Requirements for Spill Prevention, Control and Countermeasure Plans) and the equivalent requirements in the BSC SPCC Plan.

**Table 6**

| EPA 40 CFR Part 112 Regulatory Requirements | BSC SPCC Plan Components |
|---|---|
| 112.7 (a)(1) Discussion of Facility's Conformance | Section1.1 Agency Statement |
| (2) Comply with Applicable Requirements | Section 1.2 Certification |
| (3) Physical Layout including: | Section 2.0 Facility Description |

| | |
|---|---|
| - type of oil and storage capacity | Section 3.0 Storage Capacity |
| - discharge prevention measures | Section 5.1 Discharge Prevention |
| - discharge or drainage controls | Section 5.1 Discharge Prevention |
| - discharge countermeasures | Section 5.2 Countermeasures |
| - methods of disposal | Section 5.2.4 Disposal |
| - contact list and phone numbers | Sections 5.2.1 and 5.2.2 |
| - diagram | Facility Map [Appendix A] |
| (4) Spill Reporting Information | Sections 5.2.1, 5.2.2 and 5.2.3 |
| (5) Spill Reporting Procedures | Sections 5.2.1, 5.2.2 and 5.2.3 |
| (b) Prediction of the Discharge (i.e., flow) | Section 4.0 Spill Estimates |
| (c) Containment and Diversion | Sections 4.2, 4.3, 4.4 and 4.5 |
| (d) Containment Exceptions | N/A |
| (e) Inspections, Tests and Records | Section 7.0 Inspections |
| (f) Personnel, Training and Procedures | Sections 5.2.3 and 6.0 |
| (g) Security | Section 8.0 Site Security |
| (h) Tank Truck Loading and Unloading | Section 5.1.3 Tank Truck Loading |
| (i) Aboveground Container Repair | Section 9.0 AST Repair |
| (j) State Guidelines | Section 5.2.2 External Reporting |

# 11.0 Amendments, Changes and Reviews

This plan was originally prepared on December 23, 1999. The plan shall be reviewed at least every five years and revised after every reportable spill event by incorporation of the spill report, evaluation of the cause of the spill, and whatever changes are deemed appropriate to prevent recurrence of the spill. In addition, this plan should be revised if facility operations, procedures, personnel, and/or storage volumes significantly change.

This plan was prepared, reviewed and certified on the following dates.

| Date | Certified By | Major Changes |
|---|---|---|
| December 23, 1999 | Louis Ragozzino, P.E. | Original Plan |
| September 21, 2006 | James Jackson, P.E. | Plan Update |
| November 6, 2007 | Chris McDermott, P.E. | Plan Update |