



Boston College
**Environmental
Health and
Safety**

Spill Prevention Control and Countermeasure Plan

Boston College
Chestnut Hill, Massachusetts

Prepared by:
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Reviewed and Updated by:
ENSR International
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1.0 INTRODUCTION

The Oil Spill Prevention Regulations (40 CFR Part 112) are a part of the federal Clean Water Act. The regulations require that certain facilities prepare and implement a Spill Prevention, Control and Countermeasure (SPCC) Plan. Boston College is required to have a plan since the main campus stores more than 42,000 gallons of oil below ground and 1,320 gallons of oil above ground and because it could reasonably be expected under a worst-case scenario that oil could discharge to a navigable water of the United States via the campus' storm drainage system.

The guidelines specified in this Plan identify standards and procedures, responsibilities, control measures, resources and work practices that are necessary to minimize the possibility of a discharge and to ensure adequate response in the event of a release of oil into the navigable waters of the United States or adjoining shorelines.

Copies of this Plan are at the following locations:

- Available on line at <http://www.bc.edu/ehs>;
- Situated in the Office of Environmental Health and Safety; and
- Made available to all applicable fire safety, EHS and facilities personnel at Boston College.

Requests for additional copies and questions regarding the SPCC Plan should be addressed to:

Office of Environmental Health and Safety
St. Clements Hall, Room 120
Email: hallga@bc.edu
Telephone: (617) 552-0308

2.0 ADMINISTRATION

2.1 Policy

Boston College, located at 140 Commonwealth Avenue in Chestnut Hill, Massachusetts, will operate its facility in compliance with the rules and regulations applicable to its site-specific operations and activities as outlined in this Plan. Boston College 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, Boston College will take reasonable actions to contain the spill and prevent the oil from reaching and discharging into or upon the navigable water of the United States or adjoining shorelines, as defined in Title 40 Code of Federal Regulations (CFR) Part 112. The signature contained herewith designates Boston College'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: Thomas Devine
Title: Vice President, Facilities Management

Signature:
Date:

Name: Keith Kidd
Title: Director, Environmental Health & Safety, Facilities Services

Signature:
Date:

2.2 Certification

I hereby certify that I have examined the facility, and, being familiar with the provisions of 40 CFR Part 112, attest that this Spill Prevention Control and Countermeasures Plan has been prepared in accordance with good engineering practices.

Richard Cushing, P.E.
Senior Project Manager

Signature and Stamp of Registered Professional Engineer

Registration Number:

State: Massachusetts

Date:

2.3 Coverage

The policies and procedures set forth in this Plan are applicable to all Boston College personnel, faculty, staff and students who work near or with oil on campus. "Oil" means any kind, any form of oil to include heating oils, motor fuels, lubricating oils, cutting oils, quenching oils, hydraulic oils, transformer oils, mineral oils and cooking oils.

The departments that may be covered under this Plan are:

Biology	Fine Arts	Facilities Services
Chemistry	Geology	Theater
Dining	Physics	Athletics

Periodically, each department will review its use and storage of oil. Any "sensitive" areas of concern (i.e. a storm drain, etc.) where a release into the environment could occur will be noted.

2.4 Administration of Responsibility

To fully implement policies, the assistance and cooperation of all Boston College faculty, staff and students are necessary. The following descriptions outline key roles and responsibilities involved in the implementation and maintenance of this Plan.

Office of Environmental Health and Safety

The Office of EH&S reports to the Director of Facilities Services at Boston College. The Office of EH&S will oversee the SPCC Plan for the University and will conduct the following activities:

- Inspect facilities to ensure compliance with the provisions of the Plan;
- Investigate environmental releases;
- Coordinate training and maintain training records;
- Update the SPCC Plan as required;
- Serve as central coordinator for the tank and transformer oil inventory on campus;
- Ensure that safety equipment, including emergency response equipment (i.e. fire extinguishers, spill kits, etc.), is inspected and working properly;
- Remain current with regulatory and legal requirements;
- Assist departments with their inventories;
- Serve as Emergency Coordinator for Boston College;
- Coordinate waste oil disposal on campus;
- Make emergency information for the BC Community available for posting and
- Evaluate performance of this plan after a reportable incident to DEP and make appropriate revision of plan.

Additionally, the departments listed below will be responsible for the following actions:

Facilities Services

- Inform the EH&S Office of any environmental releases, provide recommendations concerning these incidents, and ensure that corrective action is taken;
- Provide updates, changes to the list of underground storage tanks (USTs), above ground storage tanks (ASTs), and oil storage (transformer oils, hydraulic oil, lubricating oils, mineral oils) and usage locations;
- Regular inspections of ASTs and piping;
- Annual leak testing of all non-consumptive USTs;
- Daily reconciliation of all non-consumptive USTs by means of a Veeder-Root monitoring system;
- Regular inspections of USTs;
- Storage of oil containers and drums in secondary containment, as needed;
- Ensure that all fill caps are correctly color-coded and locked;
- Maintain security of oil storage areas; and
- Maintain fire safety systems such as sprinkler and fire alarm systems.

Facilities Management

- Ensure that spill prevention controls, such as secondary containment, as required, are part of all new UST and AST projects;
- Provide Facilities Services and EH&S with information on new or changing USTs and ASTs; and
- Inform contractors on-site of their responsibilities in accordance with this Plan.

Other Applicable Departments (i.e. Fine Arts, Dining, etc.):

- Inform the EH&S Office of any environmental releases, provide recommendations concerning these incidents, and ensure that corrective action is taken;
- Provide updates, changes to the list of USTs, ASTs, and oil storage and usage locations;
- Storage of oil containers and drums in secondary containment, as needed; and
- Maintain security of oil storage areas.

Supervisors

The immediate supervisor of each area is responsible for implementing the policies and procedures of the Plan. It is the responsibility of each supervisor to perform the following:

- Ensure that workers know and follow policies and practices;
- Ensure that workers have been properly trained and that training activities are documented;

- Ensure that control measures selected for use are adequate and protective equipment is readily available;
- Follow recommendations made by the College to correct any unsafe conditions; and
- Maintain an inventory of oil used and stored by their respective department.

Workers

Employees of the College are expected to:

- Conform to good standard practices and procedures for the material they work with by reviewing current literature, available Material Safety Data Sheets and applicable Boston College policies;
- Wear appropriate personal protective equipment;
- Use engineering controls and safety equipment properly;
- Participate in all required training programs;
- Report to the appropriate supervisor all facts pertaining to incidents resulting in releases of oil, and any action or condition that may cause an incident with oil;
- Follow emergency response notification procedures; and
- Learn, understand, and observe all policies and practices listed in this Plan.

Contractors

Contractors who work on campus are required to be briefed by the Boston College project manager at the commencement of any large project, or periodically, as necessary.

Contractors are expected to:

- Observe BC's policies and procedures;
- Ensure that their personnel have appropriate training;
- Ensure fuel oil delivery trucks have automatic shutoff valves;
- Report damaged systems to BC personnel;
- During fuel delivery, use dry shutoff valves or have a pail to catch drippings;
- Ensure adequate capacity in tank prior to oil delivery;
- Ensure that fill caps are locked when finishing filling operations; and
- Cover any catch basin within the vicinity of a fill port, during transfer operations.
- In the event of a spill, notify the Office of Environmental Health & Safety, 617-552-0308, or after hours, BCPD at 617-552-4444.

Visitors

Visitors to Boston College who work with oil need to be aware of this Plan and observe University policies and procedures.

2.5 Inspections and Nonconformance

Containers that are not visible or accessible during normal department operations will be inspected periodically by applicable personnel to ensure container integrity and proper management. Periodic inspections will also be performed by the Office of EH&S. These will consist of formal reviews of each department's conformance with policies and procedures stated in this document. Inspections may be unannounced; however, the Office of EH&S will attempt to include representative department members during inspections of their work areas. All departments will also perform periodic self-reviews to ensure compliance with this Plan.

The Office of EH&S shall forward a copy of the completed Inspection Checklist sent to the supervisor-in-charge. Upon receipt, the supervisor will address any issues, sign-off on the checklist and send a copy back to the Office of EH&S. All checklists and documented corrective actions will be filed with the department and in the Office of EH&S.

If it is determined that there are issues of non-conformance with the Plan, corrective action should be taken immediately by the department. Departments are expected to make necessary corrections as soon as possible after notification. A signed copy of the nonconformance notification and the actions taken must be returned to EH&S within 30 days of receipt. The Office of EH&S will then follow up as necessary.

If the same non-compliance issue is noted in a department after a second inspection, and is considered to be significant in the professional judgment of EH&S staff or designee, the head of the department will also be notified in writing within 30 days after the second inspection. If, after three inspections the same significant issue exists, a report will be sent to the appropriate Vice President within 30 days of the most recent inspection.

In cases of imminent and substantial danger to life, health or the environment, the Director of EH&S or designee is authorized to order the cessation of hazardous activity until the danger from such a condition is abated or adequate protective measures have been taken.

2.6 Record-keeping Requirements

Inspections of the tank and container storage and dispensing areas not visible or accessible by College employees during normal department operations will be conducted on a monthly basis and whenever tanks are filled. Written inspection logs are maintained in the Facilities Services Office at Boston College and/or on the tanks themselves. In addition, spill incidents will be documented and maintained on file in the EH&S Office. Additional records that are maintained include the following:

- Annual Contracts with the Oil Delivery Contractors are maintained on file in the Purchasing Office;
- Annual leak test results are maintained on file in the Facilities Services Energy Managers Office; and
- Daily reconciliation and Veeder-Root system readouts are maintained in the Facilities Services Work Order Center.

Documents to be maintained in the Office of EH&S applicable to this program include:

- SPCC Plan;
- Training records;

- Records of non-conformance and corrective action;
- Applicable regulations;
- Incident reports; and
- Safety equipment inspection reports.

Records to be maintained in applicable department offices include:

- Lists (with locations) of oil used by the department;
- SPCC Plan;
- Inspection reports and corrective actions taken; and
- Material Safety Data Sheets.

Records will be kept in accordance with legal requirements, as they apply.

2.7 Plan Location

Copies of this Plan are at the following locations:

- Available on line at <http://www.bc.edu/ehs>;
- Situated in the Office of Environmental Health and Safety; and
- Made available to all applicable fire safety, EHS and facilities personnel.

Regulations specify that a copy of the Plan be maintained at the facility. It will also be made available during normal business hours for EPA review.

2.8 Plan Review & Changes

The Plan must be certified by a registered professional engineer and reviewed at least once every three years. Amendments to the Plan will take place when any of the following occurs:

- Changes in facility design, construction, operation or maintenance that affect the potential for oil discharge;
- After having two or more oil spills that exceed reportable quantities in a 12 month period; or
- A spill involving 1,000 gallons or more.

3.0 FACILITY DESCRIPTION

Facility Name:	Boston College
Facility Address:	140 Commonwealth Avenue Chestnut Hill, MA 02467
Facility Type:	Educational Facility, SIC Code #8221
Total Student Enrollment:	14,628
Faculty, Staff:	2,933
Total Acres of Chestnut Hill Campus:	116
Total Buildings:	98
Contact/Person in Charge:	Thomas Devine, Vice President Facilities Management
Business Telephone:	617-552-0371
SPCC Emergency Coordinator:	Gail Hall, EH&S Officer, EH&S
Business Telephone:	617-552-0300
Cellular Telephone:	617-256-1086 Keith Kidd, Director, EH&S
Business Telephone:	617-552-1339
Cellular Telephone:	617-256-4924
Normal Hours of Operation:	8 AM to 5 PM, Monday through Friday
Facility Site Plan:	See Figure 1

3.1 Flood Drainage

The facility and the tank systems do not lie within the 100-year floodplain.

4.0 OIL STORAGE — DESCRIPTION, USE & LOCATION

A site plan is provided in Figure 1 at the end of this Plan. Tables 1 and 2 show oil storage tank locations around the Boston College campus, and Table 3 presents an inventory of the transformers onsite.

4.1 Boston College's USTs and ASTs

Tables 1 and 2 present a summary of each of the petroleum storage tanks present at the Boston College Chestnut Hill campus (the main campus). The tables include the following information: the building location of the tank, the age of the tank, the type/make of the tank, the tank storage capacity, the petroleum product contained in the tank, any tank specific spill prevention controls, and any planned corrective actions.

4.2 Transformers

Transformer oils, associated with approximately 30 transformers, are located throughout the main campus. The quantity of oil in the transformers ranges from 80 to 424 gallons. A complete list is provided as Table 3.

4.3 Waste Oil

Waste oils are generated and stored in drums in the Service Building, Merkert Science Center, Higgins Hall, Devlin Hall, and Fitzpatrick and Kostka/Gonzaga Boiler Rooms. Where practical, waste oils are stored with a suitable form of secondary containment.

4.4 Miscellaneous Oil Storage

Virgin oils used in general facility operations are stored in drums and small containers of various sizes throughout the facility. Hydraulic oil is also used for the operation and control of elevators located at Boston College. Lubricating oils are located in the Service Building and several mechanical rooms for maintaining and servicing equipment. Mineral oils are present in Devlin Hall and Murray Carriage House by the Fine Arts Department and by Facilities Services for use in switchgears. Vegetable oils are located in various dining halls for use in cooking food.

4.5 Emergency Generators

A number of emergency generators are located around the campus. A complete listing of the ASTs associated with the generators is provided in Table 1.

5.0 SPILL ESTIMATES AND PATHWAYS

Figure 1 shows a schematic of the Boston College main campus. This section describes the potential quantities of oil released under assumed worst-case scenarios that do not necessarily reflect the probable occurrence of such events. These events are considered representative of all the potential spill incidences that could occur on the campus, and comparable procedures would be followed in the event of a spill at one of the locations that is not specifically discussed below.

5.1 Tank Filling Operations

A catastrophic release of up to 10,000 gallons of diesel or No. 2 fuel oil could occur during oil delivery procedures, where ASTs and USTs are filled via exterior fill ports. Oil delivery vehicles generally park adjacent to the building in or near which the tank is located. The fill ports to some of the tanks on campus are situated in proximity to one or more stormwater catch basins. In the event that an oil spill reached a catch basin, the oil would travel through the stormwater sewer system and discharge into the Muddy River, which eventually flows into the Charles River.

5.2 Tank Failure

There are a number of ASTs (some of which are associated with emergency generators) located around the Boston College campus, and are situated both inside and outside the buildings. Catastrophic failure at any of the ASTs could result in an oil spill of up to 600 gallons of diesel or No. 2 fuel oil. Some of the ASTs are located in proximity to floor drains or stormwater catch basins. The spilled oil would travel through the stormwater sewer system and discharge into the Muddy River, which eventually flows into the Charles River.

5.3 Fuel Dispensing Operations

The Boston College campus has two fuel dispensing facilities located outside St. Mary's Hall and the Service Building, respectively. While there is a potential for an oil spill during fuel pumping/dispensing activities, someone needs to be present in order to pump the fuel, and it is assumed that the maximum amount that could be released is less than 100 gallons. Stormwater catch basins are located in proximity to the dispensing facilities. In the event that an oil spill reached a catch basin, the oil would travel through the stormwater sewer system and discharge into the Muddy River, which eventually flows into the Charles River.

5.4 Transformers

There are approximately 30 transformers of various sizes located at the Boston College campus. These transformers contain between 80 and 424 gallons of oil. All the transformers

are placed on concrete pads, and most of them are located in landscaped areas that are sufficient to hold/contain any oil that could be spilled. However, some of the transformers are located in areas where surface drainage could allow spilled oil to flow into catch basins, then the stormwater sewer system, and eventually the Charles River.

5.5 Waste Oil

Waste oils are generated and stored in drums in the Service Building, Merkert Science Center, Higgins Hall, Devlin Hall, and Fitzpatrick and Kostka/Gonzaga Boiler Rooms. Some of these locations have floor drains in the vicinity of the oil storage area. The maximum quantity of oil that could be spilled in any one location is about 220 gallons (4, 55 gallon drums). In the event of a release, the oil could pass through the stormwater system into surface waters.

5.6 Miscellaneous Oil Storage

Catastrophic spillage from the drums and containers stored indoors throughout Boston College's main campus could result in a spill of hydraulic, vegetable, lubricating, or mineral oil. The maximum quantity stored in any one location is about 220 gallons (4, 55 gallon drums). Some of the rooms containing oil have floor drains. In the event of a release of oil in the vicinity of floor drains, the oil could pass through the stormwater system into surface waters.

6.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURES

This section presents physical systems, procedures, and measures for prevention, control, and response to spills of oil based on the potential cause of the release. The items which require activities by the oil delivery company are included in all new contracts that outline oil delivery procedures.

Except where noted, USTs and ASTs located at the Boston College campus have, at a minimum, the following spill prevention controls (Note: See Section 11.0 for a discussion on ASTs that do not currently have adequate secondary containment and a description of proposed corrective measures):

6.1 Minimum AST Spill Prevention Controls

- Signal device on vent line
- Secondary containment (when necessary)
- Regular inspections of ASTs and associated piping

6.2 Minimum UST Spill Prevention Controls

- Signal device on vent line
- Overfill/spill bucket on the fill line
- Annual leak testing on all non-consumptive tanks
- Daily reconciliation on all non-consumptive tanks by means of a Veeder-Root monitoring system
- Regular inspection of USTs

6.3 Overfills & Oil Transfer Operations

- Standard procedure requires that the fuel oil delivery trucks are to have automatic shutoff valves if a Boston College employee is unavailable to be present during the fuel oil transfer operation.
- Standard procedure requires routine inspections of ASTs, filling and dispensing areas and container storage areas, and their examination for evidence of spillage, staining, corrosion, damaged equipment, or damaged containers. Damaged systems will be repaired promptly and reported to Boston College personnel. Inspection logs are attached to individual tanks and/or piping location (for ASTs only).
- During fuel deliveries, the delivery operator must use dry shutoff valves or have a pail to catch drippage.
- A communication system (i.e., telephone, radio, walkie-talkie, or cellular phone) will be available near the storage locations during transfer operations. If fuel delivery trucks are

equipped with a communication system, that will be considered adequate means for emergency communication.

- Liquid level inventory for each tank will be measured with a graduated stick or electronic probe prior to tank filling to ensure there is adequate capacity in the tank for the oil delivery.
- AST fill caps are color coded and labeled. They are locked except during filling operations. UST fill covers are color-coded.
- Catch basins located within the vicinity of a fill port will be covered with catch basin covers during filling and oil transfer operations.

6.4 Diesel and Gasoline Dispensing

- Pump locks
- Dispensing containment pads

6.5 Piping Failure

- Piping for the AST systems are monitored visually for leaks and have been securely mounted.
- Piping for the UST systems are inspected by Boston College personnel via routine tightness testing.

6.6 Primary Tank Failure

Most ASTs have secondary containment surrounding the tanks to contain fuel oil in the event of a tank failure. The USTs at St. Thomas More Hall, St. Mary's Hall, 66 Commonwealth Ave., Gonzaga, Loyola, Fitzpatrick and Williams Halls have secondary containment in the form of double wall tank construction. The two USTs at the Service Building are in concrete containment structures. Those that do not have this protection are, for the most part, located where a catastrophic failure will not result in a release to the waters of the U.S. or a storm drain. Adequate containment measures for the ASTs in the basement of Gasson Hall and in the Generating Building in the Upper Campus have been identified as needed corrective measures as part of this Plan update (See Section 11.0 for details).

6.7 Accidental Drum/Container Spill

- Oil/water separators are provided where necessary.
- The buildings containing various oil containers are locked during off-hours.
- Containers and drums used to store oil are not stored outside or in areas proximate to storm drains. Spill basins are also used where possible.

6.8 Emergency Equipment

Emergency Equipment - General

The facility maintains a list of all emergency equipment needed for spill contingencies at the campus. A list of such equipment, including a physical description, location, and outline of their capabilities, is presented in this section.

Fire Control Equipment

Many of the buildings on the Boston College campus are equipped with complete automatic sprinkler systems. Fire fighting equipment is available at Boston College for use in emergencies related to chemical use and hazardous waste. ABC Fire Extinguishers are located in the immediate vicinity of the hazardous waste storage room and in all laboratories. A dry chemical system is situated inside the hazardous waste and flammable liquid storage rooms. Additional fire extinguishers are located throughout the campus in all the buildings. Fire hydrants are located strategically throughout the campus. All buildings are equipped with an automatic fire alarm system. The typical response time of the fire department to the campus is routinely less than 5 minutes.

Spill Control Equipment

Spill control equipment is available in the following areas:

- Merkert Hazardous Waste Room;
- Higgins Hazardous Waste Room;
- Housekeeping Office located in Lyons;
- Garage located at the Service Building;
- Trades Department Offices located in Ignacio;
- Health and Safety Office located at St. Clements Hall; EH&S Van
- Conte Forum, refrigeration room;
- Loyola boiler room;
- Fitzpatrick boiler room;
- Gonzaga boiler room;
- Williams boiler room; and
- More Hall boiler room
- Laboratories.

Posted Emergency Information Listings

Emergency information is posted at the locations stated above. This information is also on the EH&S website (www.bc.edu/ehs).

Personal Protective Equipment

The following Personal Protective Equipment is maintained at Boston College for use by personnel during an emergency involving the release of hazardous materials:

- Emergency eye wash and quick drench shower stations are located in Merkert near the hazardous waste storage rooms. Eye wash stations and safety showers are also available in all research and teaching laboratories where hazardous materials are used and hazardous wastes are generated.
- Gloves and eyewear are contained in spill kits.

Equipment Testing and Maintenance

The emergency coordinator or his/her designee will coordinate the periodic inspection of all communication and fire control equipment. He/she will ensure that spill control and personal protective equipment are readily accessible and in good working order. Fire extinguishers will be serviced annually and routinely inspected to assure they are fully charged and ready for use.

7.0 SPILL/RELEASE RESPONSE & REPORTING PROCEDURES

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

7.1 Immediately Contact Emergency Coordinator or Alternate Emergency Coordinator

At all times, there will be one person, either on-campus or on call (within 1 hour driving distance to facility), who will be responsible for coordinating all emergency response measures.

This individual will be designated the Emergency Coordinator, and will have the authority to mobilize all resources necessary to carry out procedures outlined in this Plan. The Emergency Coordinator and the Alternate(s) are thoroughly familiar with this plan, the activities at the campus, the location of storage tanks, the location of records, the campus layout, and location of all emergency response and spill clean up and control equipment.

In the event of an oil spill at the campus, contact the Emergency Coordinator immediately (see Appendix).

7.2 Emergency Coordinator Assumes Control

The Emergency Coordinator will 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 Emergency Coordinator will remain in control for the duration of the response.

7.3 Summons of Outside Support

The Emergency Coordinator, or individual directed by the Emergency Coordinator, will make the necessary contact with outside services and regulatory agencies.

In the event of a larger spill, a commercial hazardous waste vendor will be called to provide professional services for the removal and disposal of contaminated material (refer to Appendix I).

In the event of a tank rupture, the tank will be repaired or replaced per the direction of the local fire department.

7.4 Regulatory Agencies

A spill of GREATER THAN 10 GALLONS OF OIL (the reportable quantity) or a SPILL OF ANY QUANTITY THAT HAS REACHED a surface water, or into a sewer, ditch, or culvert leading thereto, is immediately reportable, by law, to one or more municipal, state, or federal authorities. The SPCC Coordinator is responsible for immediate notification of reportable spills to the appropriate authorities and agencies. In addition to the initial telephone contact, a written spill report is also required for the DEP. Emergency phone numbers listed in this plan

will be on file at the BC Police Dispatch Center and in the offices of the SPCC Coordinator and Alternates.

The following information should be provided when contacting the agencies listed in Appendix I in the order specified below:

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

Note: Copies of the addresses and phone numbers of local, state, and national emergency response teams and government agencies specified in Appendix I are kept posted at the phones located at the campus police dispatch center.

7.5 Emergency Coordinator's Responsibility (See Appendix II)

The Emergency Coordinator will assess possible hazards to human health and/or the environment that may result from a spill/release on the Boston College campus. The Emergency Coordinator must consider both direct and indirect (primary and secondary) effects of a spill/release. He/she must also decide whether an emergency situation exists with such an episode.

In the event of an emergency, the Emergency Coordinator will assume the following responsibilities:

Immediate Identification and Assessment

The Emergency Coordinator or alternate will immediately identify the nature of the emergency, noting the exact source, type, quantity and the extent of the spill.

Immediate Action

The Emergency Coordinator will perform the following immediate actions:

- Activate internal facility communication system, where applicable, to notify all building occupants.
- Notify campus police and Newton or Boston Fire Department as appropriate.

- Notify appropriate emergency teams, if needed. Designate individual to meet the responding fire, police or ambulance service at the appropriate staging area for that building.
- Notify the local safety officials, Massachusetts Department of Environmental Protection (DEP), and the U.S. Environmental Protection Agency (EPA), as appropriate, if the emergency coordinator determines that there is an imminent or actual emergency which can threaten the public health, safety, welfare, or the environment.

Assessment of Release Off-Campus

If the emergency can threaten human health and/or the environment off-campus, the Emergency Coordinator will:

- Notify local authorities (e.g. Fire Department, Police Department, and Board of Health) (See Appendix I - External Contact List).
- Be available to assist local authorities in making the decision to evacuate the local area.

During an Emergency

The Emergency Coordinator will take measures to minimize the risk for fires, explosions, or releases or contain these risks from spreading to other oil storage areas at the campus, by ensuring that the appropriate emergency response personnel are notified and clean up is initiated.

Post Emergency Activities

After an emergency, the Emergency Coordinator will:

- Supervise cleanup efforts, and ensure that the recovered oil and contaminated materials are properly stored and disposed of.
- Ensure that all emergency equipment is cleaned and ready for future use.
- Ensure that no waste that is incompatible with the released material is stored or disposed of in the affected area until cleanup procedures are completed.
- Notify local authorities and the Massachusetts DEP that cleanup has been completed and emergency equipment has been restored, before resumption of activities in the affected areas.
- Record the time, date, and details of the incident.

Notification Requirements

The following are minimal procedures for notifying DEP of releases or threats of release of oil which must be reported pursuant to 310 CMR 40.300 (also see Appendix II).

Release requiring notification to DEP in accordance with 310 CMR 40.370:

- “A sudden, continuous or intermittent release or threat of release to the environment of any hazardous material or oil that is listed in 310 CMR 40.900 or which exhibits the characteristics described in 310 CMR 40.327 and when it is likely that such release occurred within any period of 24 consecutive hours or less, (1) when such release is equal to or greater than the applicable reportable quantity, (2) if the quantity is unknown when there is a possibility that the quantity of such release is equal to or greater than the applicable reportable quantity, or (3) if the release constitutes an imminent hazard, irrespective of the quantity released or time over which the release occurred.”

Notification to DEP will be made as soon as possible but not more than two (2) hours after obtaining knowledge of a release or threat of release (for contact information see Appendix I). Notification to DEP will consist of the following information to the extent known:

- Name and telephone number of caller,
- Location of release/threat of release,
- Date and time of incident,
- Identity of oil or hazardous material involved,
- Approximate quantity,
- Source of release/threat of release,
- Brief description of incident,
- Name and phone number of owner or operator,
- Name and phone number of contact person,
- Measures taken or proposed, and
- Any information on potential environmental impacts.

Resumption of Operation

Prior to resuming normal operations, the Emergency Coordinator will ensure that all safety and emergency equipment is inspected and returned to operable conditions. The Emergency Coordinator will notify the Massachusetts Department of Environmental Protection (DEP) and appropriate local authorities that the above have been done before resuming operation.

Following clean-up operations, an assessment will be made as to the proper handling of recovered oil.

Specific Response Scenarios for Releases

The Emergency Coordinator or her/his alternate will be responsible for the proper implementation of the emergency procedures. Emergency procedures for specific types of emergencies are addressed in this section.

Medical Emergencies

A variety of personal protective equipment and emergency equipment will be maintained on site. In addition, at all times there are trained emergency medical first aid responders available at the Campus Police Station, and trained doctors and nurses at Boston College Health Services during regular business hours.

Dialing the in-campus emergency extension “4444” (Campus Police), will summon an emergency first-aid team to the scene. The following are general emergency response procedures:

- Call the in-campus emergency extension “4444” (Campus Police). Give details of the incident; if necessary, Campus Police will notify the appropriate emergency response services (i.e. Ambulance, Hospital, etc. – See Appendix I for listing of External Emergency Response Services and Contact Information);
While awaiting the arrival of an external emergency response unit, Campus Police EMT’s team will respond to the scene.
- Obtain Material Safety Data Sheets (MSDSs) of the chemical involved (MSDSs are located in the Office of Environmental Health and Safety and can be obtained on the EH&S web site (www.bc.edu/ehs). The description of the incident and the Material Safety Data Sheet (MSDS) should be sent, and/or faxed to the hospital with the victim.

Spill Events

In the event of an incident involving a large spill (greater than 1 gallon of hazardous material or 1 pint of acutely hazardous material)

- Alert Campus Police (“4444”). Campus Police will immediately notify the Emergency Coordinator or her/his Alternate. The Campus Police or the Emergency Coordinator will summon additional assistance, if necessary (local or state emergency response teams, fire depts., etc);
- Trained responders will use appropriate personal protective equipment (PPE). Determine exact source of leak or spill, amount, and area affected by the release;
- Dike spill material with standard industrial absorbent. Take the necessary action to keep the spill from spreading. Spread absorbent to surround and absorb the spilled material;
- Collect contaminated material (absorbent, rags, disposal suits, etc.) into a recovery drum and label for proper disposal;
- Clean, restore, and replace PPE and spill response equipment; and
- Follow all notification and recordkeeping requirements specified above in section entitled ‘Notification Requirements’ (under Section 7.5).

Releases to Surface and Groundwater

Releases to surface or groundwater from Boston College are unlikely because oil is stored in containment areas, or inside buildings. These measures would prevent any spill from reaching surface or groundwater, or the environment. If a situation arises where the surface or groundwater, or the environment, is threatened, the Emergency Coordinator at Boston College will call the emergency contractor (Spill Contractor listed in Appendix I - External Emergency Response Services and Contact Information).

If a release threatens a surface water body by entering storm drains, the Emergency Coordinator at Boston College will initiate appropriate containment controls, until the material can be absorbed or until arrival of a spill contractor. Contaminated areas will be decontaminated and cleaned as appropriate. The Massachusetts DEP and the National Response Center will be notified immediately (see Appendix I) following any release or threat of release that requires such notification in accordance with 310 CMR 40.370.

Boston College will comply with the requirements of 310 CMR 40.300 and the Massachusetts General Law, Chapter 21E in the event of a release or threat of a release to the environment.

8.0 DISPOSAL OF SPILL MATERIALS

Oil spills are cleaned up using spill absorbent material, and oil contaminated debris is drummed for off-site disposal. An outside contractor, (listed in Appendix I), is responsible for off-site disposal in accordance with applicable regulations.

9.0 PAST SPILL EVENTS

In compliance with 40CFR 112.7a, Appendix III provides a brief description of each spill event this facility has experienced since January 10, 1973. The corrective action and plans for preventing recurrence are included for each incident.

10.0 TRAINING PROGRAMS

- Facility personnel are properly instructed in the operation and maintenance of equipment to prevent the discharge of oil.
- All personnel responding to an emergency are trained according to the level of response expected from that employee.

Depending on the response level, the training includes the following:

- Spill prevention and notification procedures;
- Spill cleanup procedures;
- Oil handling procedures; and
- Internal facility communication/alarm systems.
- Appropriate Boston College personnel have been provided with the annual HAZWOPER and First Responder Awareness training.
- Periodic briefings are conducted to assure adequate understanding of the SPCC Plan. Briefing will highlight and describe any spill events or equipment failures that may have occurred in the previous year. Briefing will also include any new precautionary measures or changes in response actions.

11.0 PROPOSED CORRECTIVE MEASURES

As a result of this Plan update, the following corrective measures have been deemed necessary, and will be implemented as soon as possible:

1. Installation of berms at door of tank room at Gate E.

12. AMENDMENTS, CHANGES, REVIEWS AND COPIES OF PLAN/AGREEMENTS

12.1 Plan Review

This SPCC portion of this Plan was originally prepared in March 1997, and has since been updated/revised as necessary. The Plan will be reviewed at least every three 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, the Plan will be revised if facility operations, procedures, and/or storage volumes significantly change.

This Plan will be reviewed and, if necessary, immediately updated whenever any of the following take place:

- The Plan fails in an emergency;
- The list of emergency coordinators changes;
- The list of emergency equipment changes;
- There is any change in the operation or maintenance of the facility; or
- There occurs any other circumstance, which indicates the need for a change in the Plan.

Plan prepared by Rizzo Associates, Inc.

March 5 1997

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