

NEW YORK CITY COLLEGE OF TECHNOLOGY

The City University of New York 300 Jay Street, Brooklyn, NY 11201-1909

Spill Prevention, Control and Countermeasure (SPCC) Plan 2013

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Project #: 1623.13.01

For: New York City College of Technology CUNY 300 Jay Street Brooklyn, New York 11201-1909

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1.0 Conformance Discussion

New York City College of Technology (NYCCT) located at 300 Jay Street, Brooklyn, New York, is owned by The City University of New York (CUNY). It operates as an educational institution.

At NYCCT, petroleum products stored in underground and above-ground storage tanks throughout the campus grounds are used for fuel for emergency power and heating oil. In addition, hydraulic oils are used for elevator operations. This Spill Prevention Control and Countermeasure (SPCC) Plan is site-specific to the NYCCT storage facility. The objective of this plan is to prevent the spillage of oil, to contain spilled oil and to prevent spilled oil from reaching navigational waterways. In addition, this plan includes measures for protecting groundwater. The plan has been prepared in accordance with the requirements listed in the Oil Pollution Regulations of the US Environmental Protection Agency (40 CFR 112.7).

1.1 Plan Availability

The SPCC Plan for NYCCT Community College is maintained on campus by the SPCC Coordinator (See Section 1.2).

The SPCC Plan will also be made available to NYCCT personnel for their information and use. Additional copies of the SPCC Plan will be located at the following locations:

- Buildings and Grounds Office
- Heating Plant
- Environmental Health & Safety Office

This SPCC Plan will be accessible to NYCCT personnel and federal, state, and/or local authorities during normal business hours. Requests from other than members of the college community to review the SPCC Plan will be directed to the SPCC Coordinator.

1.2 General Facility Identification Information

Facility name:	New York City College of Technology
Owner: Address:	The City University of New York (CUNY) 535 East 80 th Street New York, New York 10021
Owner Contact:	Michael Spath CUNY Environmental Compliance Manager (212) 794-5735
Operator: Address:	New York City College of Technology 300 Jay Street





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Physical location:	Brooklyn Kings County, New York State
Mailing address	New York City College of Technology 300Jay Street Brooklyn, NY 11201
USEPA ID No.:	NYD174685479
Operator Contact:	Primary Contact: Mr. Luis Venegas, CIH, CSP Environmental, Health and Safety Manager, SPCC Coordinator SPCC Coordinator (718) 260-5858 (Office) (917) 797-9605 (Mobile)

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2.0 Facility Description and Operation

NYCCT has operated as part of the City University of New York (CUNY) system since 1964 and consists of the following entities with facilities:

NAMM Complex: 300 Jay Street. Four interconnected buildings make up the NAMM Complex, all addressed as 300 Jay Street. These buildings are currently recognized as NAMM Building, General Building, Pearl Building and Atrium Building. The registered tank systems under the NYCDEC PBS No. 2-601217 consist of Tank N02 (50-gallon diesel AST); N03 (275-gallon diesel AST); N04 (2,000-gallon diesel UST); and N05 (325-gallon diesel AST). The purpose of the NAMM petroleum storage facility is solely to supply the emergency generator system.

Voorhees Hall: 186 Jay Street. The registered tank systems consist of: V01 (5,000-gallon, #2 fuel AST); V02 (275-gallon diesel AST); V03 (275-gallon diesel AST); and VO4 (75-gallon diesel AST).

Environmental Building: 172 Pearl Street. The registered tank systems consist of E03 (2,000-gallon #2 fuel AST) and EO4 (50-gallon #2 fuel AST). This plan also includes one the pump reservoir (120-gallon capacity) for a hydraulic elevator located at the Environmental Building.

The petroleum storage tank systems described above store heating oil for the building/s heating system and diesel fuel to run emergency generators.

As required per 40 CFR Part 112.7(a)(3), Figure 2 presents the locations of the campus structures, oils storage container locations, contents of each container, and associated oil transfer areas.

As described in Table 1 (see Tables tab) of this SPCC Plan, NYCCT currently has a total oil storage capacity, which exceeds the capacity threshold of 1,320 gallons prescribed in the SPCC rule.

For additional details on individual tank locations, and oil transfer activities at NYCCT, refer to the following sections.

2.1 Description and Current Status of Facility Components

Details describing the tanks and other components registered under NYSDEC PBS facility 2-601217 and/or covered by this SPCC plan are summarized below. The order of the listing is based on the order of importance of the component to the facility or system.

N04 The 2,000-gallon diesel UST is located in the NAMM complex in a gated service bay. The area is accessible off Johnson Street (a/k/a Tech Place) through a



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locked and alarmed automatic gateway. N04 is constructed of double-wall fiberglass and was installed in November 2012 to replace N01 as the primary fuel storage tank for the emergency generator system of the NAMM complex. Tank N01 was properly decommissioned and delisted with the NYSDEC PBS program. The diesel fuel stored in N04 is pumped to N02 and N03 located in the same general area.

- N02 N02 consist of an above-ground pump reservoir used as intermediate storage for fuel being pumped from N04 to N05, the belly tank built within the structure of the generator engine. The reservoir is capable of storing up to 50 gallons of fuel.
- N05 As discussed above, N05 is the 275-gallon belly tank built into the base of the emergency generator. The tank, along with the generator and N04, was installed in November 2012 during an upgrade of the generator and storage systems.
- N03 N03 consist of a free-standing, 275-gallon diesel AST. The tank is currently inactive although it is still listed with the NYSPDEC PBS program. The tank was formerly used as a day tank for the former emergency generator system.
- V01 The 5,000-gallon AST is located in a dedicated tank room accessible through the Engineer's Office in the basement of the Voorhees Building. The tank is box-shaped and constructed of double-wall steel. The tank is set on concrete slab elevated four inches above the base of the tank room floor. The entrance to the tank room is elevated approximately three feet. The fill port is contained within a locked cabinet located indoors in the building loading dock off High Street. V01 supplies #2 fuel oil to the building heating system.
- V02 V02 consists of a 275-gallon AST storing diesel fuel for the emergency generator system located on the 9th floor of the Voorhees Building. The tank is located in basement Room VO15. The fill port for V02 is located in a locked containment adjacent to the Pearl Street entrance.
- V04 V04 consist of an above-ground pump reservoir used as intermediate storage for fuel being pumped from V02 to the 9th floor emergency generator system. The reservoir is capable of storing 75 gallons of fuel.
- V03 Consists of a 275-gallon AST located in the 9th floor penthouse mechanical room, adjacent to the 9th floor emergency generator. The tank is used as a day tank for the generator. V03 is contained within a metal diked containment. Fuel is pumped to V03 from V02 and V04 via a pipe network. V03 then supplies the engine for the generator.
- E03 The 2,000-gallon AST is located in a sub-grade trenched area outside the building footprint, adjacent to the boiler room of the Environmental Building, 172 Pearl Street. Access to the fill port and the area above the tank is through a locked gated area off Adams Street, on the east side of the building. Access to



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the tank is through boiler room. The tank is box-shaped and constructed of double-wall steel. The tank is located in a sub-grade containment bounded by building and trench walls. The tank set on concrete slab elevated six inches above the base of the tank room floor. Adequate space is available to inspect around the tank for indications of leakage. E01 supplies #2 fuel oil to the building heating system and an emergency generator system.

- E04 consists of a 50-gallon AST day tank supplying #2 fuel oil to the emergency generator system of the Environmental Building. Fuel oil is pumped to E04 from tank E03 through a pump and pipe network.
- Reservoir This designation refers to the hydraulic oil pump reservoir of the Environmental Building Hydraulic Elevator. As this equipment is not considered a "storage tank," it is not included with the NYSDEC PBS program. The reservoir is located in a separate locked room of the building basement, the elevator mechanical room.

Table 1 (see Tables tab) describes the details of the containments, inventory monitoring and leak detection equipment for all the storage tanks and components discussed above.

2.2 Storm and Sanitary Discharge from Facility

2.2.1 Storm Water Discharges

Storm water runoff from NYCCT flows into the municipal Combined Sewer Overflow (CSO) system and is conveyed to the Red Hook Water Pollution Control Plant. Overflows from the CSO system and effluent from the Red Hook Water Pollution Control Plant discharge to the East River.

2.2.2 Sanitary Wastewater Discharges

Sanitary wastewater that is generated on campus is discharged to the Red Hook Water Pollution Control Plant. Currently, there are no open drains or other pathways connected to the sanitary wastewater system within or adjacent to the oil storage areas at NYCCT.

2.3 Storage Tanks and Oil Inventory

As required per 40 CFR Part 112.7(a)(3), Figure 2 presents the locations of the campus structures, storage container locations, contents of each container, associated oil transfer areas, and associated connecting pipelines.



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As described in Table 1 (see Tables tab) of this SPCC Plan, NYCCT currently has a total above-ground oil storage capacity which exceeds the 1,320 gallon threshold prescribed in the SPCC rule.

The following table summarizes the current type and volume of storage covered in this plan.

Storage Type	No. of Storage Units	Total Volume (gallons)
UST-Diesel	1	2,000
AST-Diesel	9	8,325
Elevator Reservoir- Hydraulic Oil	2	240

Table 2-1: Storage Summary Table

For additional details on individual container locations and oil transfer activities at NYCCT, refer to the following sections.

2.4 Other Oil Filled Operational Equipment

Currently, no other oil bearing equipment other than that listed in the Storage Summary Table above are included in this plan.

2.5 Facility Security

Secure and Control Access – All the NYCCT storage tank systems are either indoors or within locked fence containments. Major fill ports are within locked covering. NYCCT maintains surveillance cameras and a 24-hour security staff that patrols the buildings that make up the campus.

Drain valves – Drain valves, which permit the outward flow of tank contents to the surface, will be securely locked in the closed position when in non-operation or non-standby status.

Starter controls – The starter controls and valves (including automatic switches associated with back-up generators) for each of the applicable tanks at the facility will be maintained in a locked "off" position or are located at areas only accessible to authorized personnel.

Loading/unloading connections – The unloading/ loading connections for tank systems will be securely capped and locked when not in service or in standby service for an extended period of time.

Facility lighting systems – There is sufficient lighting to assist in the discovery of spills during hours of darkness (both by operating personnel and non-operating personnel), and the minimization of oil spills occurring through acts of vandalism.



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2.6 Equipment Security

NYCCT personnel use lock out, tag out procedures and other labeling in order to ensure that any valves that control container contents are properly closed and remain in the closed position. Only authorized personnel are permitted to operate oil pumps and other oil using equipment. Locking devices are used on starter and control switches. Empty lines are securely capped.

3.0 Fault Analysis

40 CFR 112.7(b) - Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.

3.1. Potential Spill Sources, Volumes, Rates and Control

To provide that adequate spill prevention, control, and countermeasures are in place, 40 CFR Part 112.7(b) states that an SPCC Plan must include a prediction of the direction, rate of flow, and total quantity of oil that could be spilled from equipment failures (*e.g.*, container overflow, rupture, or leakage). The SPCC Plan should also identify the largest potential spill that could be anticipated from each spill source.

Table 1 (see Tables tab) describes potential spill sources, a prediction of the direction of flow, rate of flow, and total quantity of oil that could be discharged from each potential source. *Note:* The potential release volumes described in Table 1 do not take into account the use of any containment or diversionary structures or equipment.

3.2. Predicted Fates of Potential Spills

Table 1 (see Tables tab) identifies the locations of the oil storage areas and the water body that would be affected in the event of a release from the container or during product transfer activities.



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4.0 Discharge Prevention Measures

4.1 Discharge and Drainage Controls

Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in Sec. 112.1(b), except as provided in paragraph (k) of this section for qualified oil- filled operational equipment, and except as provided in Sec. 112.9(d)(3) for flow lines and intra-facility gathering lines at an oil production facility. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs. In determining the method, design, and capacity for secondary containment, you need only to address the typical failure mode, and the most likely quantity of oil that would be discharged. Secondary containment may be either active or passive in design. At a minimum, you must use one of the following prevention systems or its equivalent:

(1) For onshore facilities:

- (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil;
- (ii) Curbing or drip pans;
- (iii) Sumps and collection systems;
- (iv) Culverting, gutters, or other drainage systems;
- (v) Weirs, booms, or other barriers;
- (vi) Spill diversion ponds;
- (vii) Retention ponds; or
- (viii) Sorbent materials.

As previously described, Table 1 (see Tables tab) of this SPCC Plan presents an inventory of oil products and associated containment and/or diversionary structures or spill control equipment associated with the storage containers at the facility.

The following presents a response to each component under the requirements of 40 CFR 112.8(b)(1-5).

4.1.1 Drainage from storage areas – 40 CFR 112.8(b)(1). Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge.

There are currently no outdoor storage areas that can accumulate rainwater in secondary containment dikes or structures. Therefore, the requirements of this section do not apply to the NYCCT facility.

4.1.2 Flapper-type drain valves – 40 CFR 112.8(b)(2). Use valves of manual, openand-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas.



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Currently, there are no flapper-type drain valves associated with tank containment systems at the facility; therefore, the requirements for this section do not currently apply to the NYCCT facility.

4.1.3 Undiked area drainage – 40 CFR 112.8(b)(3). Design facility drainage systems from undiked areas with a potential for a discharge to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility.

There are no undiked oil storage areas at the facility. Therefore, the requirements of this section do not apply to the NYCCT facility.

4.1.4 Other drainage – 40 CFR 112.8(b)(4). If facility drainage is not engineered as described in Undiked area drainage – 40 CFR 112.8 (b)(3), then the facility must equip the final discharge of all ditches inside the facility with a diversion system that would retain an uncontrolled discharge.

There are no undiked oil storage areas at the facility. In addition, NYCCT will comply with the provisions of 40 CFR Part 112.7(c) for transfer areas.

4.1.5 Treatment of drainage water – 40 CFR 112.8(b)(5). If the drainage waters are treated in more than one continuous treatment units and pump transfer is needed, then the facility must provide two lift pumps, at least one of which must be permanently installed.

The facility does not treat drainage waters in more than one "treatment unit;" therefore, the requirements for this section do not currently apply to the facility.

4.2 Facility Tank/Truck Loading/Unloading

Based on clarifications published by the USEPA in the Federal Register on May 25, 2004 and the current tank truck unloading/loading areas at the facility, there are no "unloading/loading rack" areas. Therefore, the requirements for this section currently do not apply to the NYCCT facility.

The following spill prevention measures are currently in place at the facility to prevent or minimize the risk of an oil release to navigable waters. The following spill prevention measures are currently in place at the facility to prevent or minimize the risk of an oil release to navigable waters.

4.2.1 Fuel transfer containment system – 40 CFR 112.7(h)(1). Where loading/unloading rack drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading/ unloading racks. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.



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Since the facility does not operate a loading/unloading rack, this section is not applicable. However, spill prevention measures, such as unloading procedures, are currently in place at the facility to prevent or minimize the risk of an oil release to navigable waters. This includes monitoring the fuel filling operation by trained personnel equipped with emergency spill containment equipment and communication devices for immediate notification.

4.2.2 Warning system – 40 CFR 112.7(h)(2). Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks or vehicle brake interlock system in the area adjacent to a loading/unloading rack, to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.

NYCCT personnel and the truck driver will remain present for the entire duration of the loading/unloading operations. Warnings to prevent vehicle departure prior to complete disconnection of transfer lines are also given via verbal communications by the NYCCT personnel. The NYCCT personnel will be equipped with communication devices for immediate notification in the event of an accident or other unexpected release during the filling process.

4.2.3 Drain inspection – 40 CFR 112.7(h)(3). Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

Prior to the departure of a tanker truck and as described in the *Tanker Truck Unloading/Loading Procedures* (Appendix D), the lower-most drain and all outlets of the tanker truck are inspected for leakage by the delivery personnel. If leakage is observed, the drains or outlets will be tightened, adjusted, or replaced by the driver to prevent oil leakage while in transit.

4.3 Field Constructed Above-Ground Containers

Brittle fracture - 40 CFR Part 112.7(i). If a field-constructed above-ground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

In accordance with 40 CFR Part 112, a field-constructed aboveground container is one that is assembled or reassembled (outside of the container manufacturer) at the location of its intended use. Currently, NYCCT does not have field-constructed above-ground containers under normal conditions and there is no permanent plan to include field-constructed above-ground containers in the future. Therefore, the requirements of this section do not currently apply to this section.



4.4 Facility compliance with other applicable prevention standards

As NYCCT currently has a storage capacity over 1,100 gallons of "petroleum," the facility is also subject to the NYSDEC's Petroleum Bulk Storage (PBS) Regulations (6 NYCRR 612 – 614). There is currently no requirement, however, by the NYSDEC to prepare a specific spill prevention and response plan for PBS tanks.

In accordance with the NYSDEC's PBS Regulations, NYCCT will register and conduct inspections on their PBS ASTs on a monthly basis. Identified deficiencies that are observed during the inspection are addressed promptly by NYCCT personnel.

As required by the NYSDEC PBS regulations, 6 NYCRR Part 613.3(c)(3), NYCCT will permanently mark all fuel/petroleum product tanks, tank gauges, and fill ports to identify the contents inside the tank.

For the purposes of compliance with 40 CFR 112.7(j), and in order for NYCCT personnel to evaluate compliance with the applicable NYSDEC PBS regulatory requirements, the following materials should be consulted:

- NYSDEC, Compliance Audit Petroleum Bulk Storage Regulations, 6 NYCRR 612 – 614
- NYSDEC, Spill Prevention Operations Technology Series ("SPOTS"), Memo #6, Overfill/Spill Prevention Equipment For Petroleum Storage Tanks
- NYSDEC, Spill Prevention Operations Technology Series ("SPOTS"), Memo #10, Secondary Containment Systems For Aboveground Storage Tanks
- NYSDEC Spill Prevention Operations Technology Series ("SPOTS"), Memo #17.

See Section 6 for specific NYSDEC spill reporting requirements.

4.5 Qualified Oil Filled Operational Equipment

NYCCT currently maintains oil-filled operational equipment (*i.e.*, hydraulic elevator reservoirs, generator crank cases), with capacities greater than or equal to 55-gallons and are identified in Table 1 and Figure 2. As described in Table 1, NYCCT will provide general secondary containment to their subject oil-filled operational equipment in accordance with 40 CFR 112.7(c). These reservoirs are incorporated into the facility's monthly visual inspections and documented in Appendix I – *Oil-Containing Equipment Reservoir Inspection Checklist*.

The facility currently maintains one hydraulic elevator reservoir (storing 175 gallons of hydraulic oil) located at the Environmental Building, 172 Pearl Street. Leaks from this equipment will be attended to in accordance with the procedures described in this





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SPCC plan. The equipment will be inspected on a monthly basis using the "Oil-Containing Equipment Reservoir Inspection Checklist" in Appendix I.



5.0 Specific SPCC Plan Requirements

5.1 Purpose

In accordance with Subpart B - 40 CFR Part 112.8, this section of the SPCC Plan addresses specific requirements for the use and storage of petroleum or non-petroleum oils, excluding animal fats and vegetable oils.

5.2 Record Keeping

Records of documented monthly visual inspections, alarm tests or other specialized oil related occurrences (non-spills) will be signed by the appropriate NYCCT staff member (person who conducted inspection or supervisor) and will be maintained on-site for at least ten years in the EHS Office. All records of inspections will include the following information, where appropriate:

- Date and time of inspection
- Name and signature of the inspector
- Identification numbers for the tanks
- Results of the inspection, including deficiencies and corrective actions necessary
- Explanation of why remedial actions were not completed, if applicable

5.3. Bulk storage containers – 40 CFR 112.8(c)

The following presents a response to each component under the requirements of 40 CFR 112.8(c)(1 - 11).

5.3.1 Container compatibility with contents – 40 CFR 112.8(c)(1). Both the material and the construction of the storage container must be compatible with the contents stored and the conditions such as pressure in which they are stored.

The facility will ensure compatibility with the tank contents prior to storing material in the tank.

5.3.2 Diked area construction and containment volume – 40 CFR 112.8(c)(2). Construct all bulk storage tank installations (except mobile refuelers and other non-transportation-related tank trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.

Currently, each of the aboveground storage tanks located at NYCCT has sufficient secondary containment. Specifically, the containers are either diked or located in rooms with no floor drains. The secondary containment areas are sufficient enough to contain the entire capacity of the largest container within the containment area and will be maintained sufficiently impervious.

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5.3.3 Diked area, inspection and drainage of rainwater – 40 CFR 112.8(c)(3). Do not allow uncontaminated rainwater from diked areas to bypass the facility treatment system and flow into a storm drain or into an open watercourse, lake, or pond unless: 1) the bypass valve is normally kept sealed closed; 2) the rainwater is inspected for signs of petroleum in order to prevent a discharge; 3) after the bypass valve is opened it is sealed closed properly again; and 4) adequate records of such actions are kept.

With the exception of the temporary fuel storage/heating system, there are no permanent outdoor diked areas at NYCCT that can accumulate rainwater, therefore the requirements for this section do not currently apply.

The temporary fuel storage and heating system is located outdoors adjacent to the west side of the Central Services building. The system includes three 4,000-gallon, No. 2 fuel ASTs and two portable boilers. Storm water sewers and other receptors have been identified and protected. A temporary containment consisting of hydrophobic booms has been installed around the perimeter of the system. Water accumulation within the containment would filter through the boom before exiting the area.

5.3.4 Corrosion protection of buried metallic storage containers – 40 CFR 112.8(c)(4). Protect any completely buried or bunkered metallic tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. These tanks must also be tested regularly for leaks.

One UST, N-04, is present at the NAMM Building. N-04 is 2,000 gallons in capacity and constructed of double-wall fiberglass reinforced plastic (FRP) (see Table 1). The UST is also equipped with interstitial leak detection and inventory monitoring via a Veeder Root TLS-300C tank monitoring system. All other petroleum storage tanks and other components are situated above ground.

5.3.5 Corrosion protection of partially buried metallic storage containers – 40 CFR 112.8(c)(5). Do not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion by coatings, cathodic protection compatible with local soil conditions.

NYCCT does not have partially buried storage tanks; therefore, the requirements for this section do not apply to the facility.

5.3.6 Aboveground container periodic integrity testing – 40 CFR 112.8(c)(6). Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic



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testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of nondestructive testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices satisfy the recordkeeping requirements of this paragraph.

The December 5, 2008 Amendment to the SPCC regulations published by the USEPA clarifies the guidance provided in the SPCC Guidance for Regional Inspectors (Version 1.1 dated February 3, 2006) and the USEPA letter to the Petroleum Marketers Association of America Memo. These documents allow the P.E. to certify the inspection program it describes as being appropriate for the facility, as long as consistency with good engineering practice is maintained and applicable industry standards are considered. Visual inspections are considered sufficient for "shop built" containers less than 30,000 gallons that are elevated or positioned on a barrier such as a liner that prevents the container from having direct contact with soil. These approaches generally reduce corrosion potential and allow for visual identification of a potential container failure before it becomes significant.

As NYCCT currently maintains aboveground containers that meet the above-referenced criteria, monthly visual integrity inspections (as described above) will be performed on "shop-built" tanks using Appendix G – *Monthly Tank Inspection Log.* In addition, NYCCT conducts *visual* integrity inspections of 55-gal drums (those that do not have any contact with the ground) on at least a *monthly basis*. These monthly visual inspections will be recorded and documented by NYCCT personnel using Appendix H – *Drum Storage and Handling Inspection Record*.

Identified deficiencies that are observed during the various above-referenced inspections are addressed promptly by NYCCT personnel.

5.3.7 Control of leakage through internal heating coils – 40 CFR 112.8(c)(7). Prevent leakage from internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

No tanks in the current NYCCT facility and addressed in this plan are equipped with internal heating coils. Therefore, this section does not apply to the NYCCT facility.

5.3.8 Level alarm and gauge - 40 CFR 112.8(c)(8). Engineer or update each container installation in accordance with good engineering practice to avoid discharges. At least one of the following devices must be provided: 1) high liquid level alarm; 2) high liquid level pump cutoff device set to stop flow at a certain level; 3) direct audible or code signal communication between the container gauges and the pumping station; or 4) a fast response system for determining the liquid level of each container such as



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digital computers, telepulse, or direct vision gauges. These liquid level-sensing devices must be regularly tested.

The bulk oil storage containers at the facility are equipped, at a minimum, with direct vision level gauges or high level alarms. The unloading procedures at NYCCT allow containers to be filled to a safe volume, which is designated to be 90% of the container capacity. The containers, including the various liquid level-sensing devices, are inspected on a regular basis (see Appendix G – *Monthly Tank Inspection Log*).

The containments for the 5,000-gallon AST located at the Voorhees Building (V-01) and the 2,000-gallon AST at the Environmental Building (E-03) are equipped with liquid detection devices, manufactured by Pneumercator[®], adjacent to the base of each tank. These devices are housed in 4-inch screened PVC to detect released diesel fuel accumulating on the containment floor. The instrument is attached to an alarm system to alert the facility operators if a leak is detected.

5.3.9 Observation of disposal facilities for effluent discharge – 40 CFR 112.8(c)(9). Effluent treatment facilities must be observed frequently enough to detect a possible system upset that could cause a discharge.

NYCCT currently discharges non-contact cooling water and storm water only. No other effluent is discharged from the facility into navigable waters of the U.S. or adjoining shorelines; therefore, the requirements for this section do not currently apply to the NYCCT facility.

5.3.10 Visible oil leak corrections from container seams and gaskets – 40 CFR 112.8(c)(10). Visible discharges that result in a loss of oil must be promptly corrected. Any accumulations of oil must be promptly removed from diked areas.

Visible oil leaks are reported so that corrective actions can be immediately implemented. Measures are taken to minimize and mitigate the leak, while awaiting repair. If a leak or spill is observed, the leaked oil product is cleaned up immediately by NYCCT personnel. Oil spill cleanup supplies are stored at appropriate locations throughout the campus (see Appendix J – *Emergency Containment and Cleanup Supplies*).

5.3.11 Appropriate position of mobile or portable oil storage containers – 40 CFR 112.8(c)(11). Position or locate mobile or portable oil storage containers to prevent a discharge as described in Sec. 112.1(b). Except for mobile refuelers and other nontransportation-related tank trucks, you must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

NYCCT positions mobile or portable oil storage containers (*i.e.*, 55-gallon drums) to prevent a discharge as indicated in Table 1 and Figure 2. Monthly visual inspections of



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this tank will be documented using Appendix H – Drum Storage and Handling Inspection Record.

5.4 Facility Transfer Operations, Pumping, and Facility Process – 40 CFR 112.8(d)

The following presents a response to each component under the requirements of 40 CFR 112.8(d)(1-5).

5.4.1 Corrosion protection for buried piping – 40 CFR 112.8(d)(1). Buried piping installed or replaced on or after August 16, 2002 must be provided with a protective wrapping and coating. Corrosion protection standards must also be met. Any exposed line must be inspected for corrosion, if found corrective action must be taken.

If a section of buried line is installed or any piping installed on or after 2002 is replaced, NYCCT personnel will carefully inspect for deterioration. Additionally, cathodic protection, a protective wrapping, or a corrosion-resistant wrapping will be used to protect buried piping from corrosion. Documentation of such inspection will be completed by using Appendix G – *Monthly Tank Inspection Log*. If corrosion damage is observed, NYCCT will undertake additional examination and corrective action as indicated by the magnitude of the damage.

5.4.2 Piping not-in-service – 40 CFR 112.8(d)(2). The terminal connection at the transfer point must be capped or blank-flanged and marked as to its origin when piping is not in service or is in standby service for an extended period of time.

Pipeline terminal connections at NYCCT will be capped when not in operation. In addition, the contents of the tank, design capacity, and working capacity are posted at the fill port piping locations.

5.4.3 Aboveground piping supports design – 40 CFR 112.8(d)(3). Pipe supports must be designed as to minimize abrasion and corrosion and allow for expansion and contraction.

The piping supports for the areas with aboveground piping will be properly designed to minimize abrasion and allow for expansion and contraction. In addition, piping exposed to weather is painted to help prevent corrosion.

5.4.4 Aboveground valves and pipeline examination – 40 CFR 112.8(d)(4). All aboveground valves, piping, and appurtenances must be regularly inspected during which the general condition of the items must be assessed. Integrity and leak testing of buried piping must be conducted at the time of installation as well as during any modification, construction, relocation, or replacement.

Aboveground valves and pipelines will be examined by NYCCT personnel on a monthly basis to assess the conditions of the flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, and metal surfaces. Inspections of these above-referenced items will be conducted during the inspection of the tank system and results

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are included on the *Monthly Tank Inspection Log,* included in Appendix G. Deficiencies observed during the inspection will be addressed promptly.

5.4.5 Aboveground piping protection from vehicular traffic – 40 CFR 112.8(d)(5). All vehicles entering facility must be warned not to endanger aboveground piping or other oil transfer operations.

The facility has positioned aboveground oil distribution piping so that there is no potential for damage from vehicular traffic.



6.0 Discharge Countermeasures

6.1 Spill Response

6.1.1 Personnel training – 40 CFR 112.7(f)(1). At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges.

Oil-handling personnel at NYCCT are required to attend a spill prevention training session, which includes a complete review of the facility's SPCC Plan. Employees are also instructed and tested on the job. On an annual basis, employee refresher training for spill response is also conducted. The facility's SPCC training program includes the following:

- Review of the contents of the SPCC Plan.
- Instruction of personnel in the operation and maintenance of equipment to prevent the discharge of oil products, and in applicable pollution control laws, rules and regulations.
- Standard operating procedures used to prevent discharges of oil.
- Spill identification, notification, containment, control, and clean-up procedures and techniques.
- Discussion of past spill events, currently malfunctioning components or systems, if any, and recently developed precautionary measures.

Records of the spill prevention and response training provided to employees are maintained by the SPCC Coordinator using the SPCC Plan *Employee Training Attendance Record* (see Appendix F) or comparable document. The facility SPCC Coordinator is responsible for the confirmation that these records are being maintained.

6.1.2 Designated person accountable for spill prevention – 40 CFR 112.7 (f)(2). Designate a person at each facility who is accountable for discharge prevention and who reports to facility management.

The SPCC Coordinator is the designated person accountable for spill prevention at NYCCT and reports to college management.

6.1.3 Spill prevention briefings – 40 CFR 112.7(f)(3). Schedule and conduct discharge prevention briefings for your oil handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility.

In accordance with 40 CFR 112.7(f)(3), spill prevention briefings are scheduled and conducted on an annual basis for oil-handling personnel to assure that each employee has an adequate understanding of the college's SPCC Plan. Past spill incidents (if any), and/or "close-calls," are discussed in these meetings to help prevent spills from recurring. Employee feedback and recommendations are encouraged in spill prevention and operations. Documentation, which includes the topics of discussion at each meeting, is maintained for compliance documentation.

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6.2 Countermeasure Procedures

This SPCC Plan has been prepared for the prevention and control of oil spills at NYCCT. In the event of an oil spill or leak, the person discovering the oil from a storage container, tank or equipment must immediately initiate the following actions:

Extinguish all sources of ignition and isolate incompatible or reactive chemical substances.

- 1. Contact Public Safety with the location and nature of the spill.
- 2. If there is an immediate threat to human health, evacuate the immediate area.
- 3. Extinguish all sources of ignition and isolate incompatible or reactive chemical substances if possible without exposing personnel to unsafe conditions.
- 4. Isolate all potential environmental receptors such as floor drains, catchbasins, sumps, exposed soil, and runoff areas.
- 5. If there are no health or safety hazards, and there is a reasonable certainty of the origin of the leak/spill, proceed or attempt to stop or contain the spill/release at the source.

Contact the following to provide information regarding the spill event:

Mr. Luis Venegas, CIH, CSP Environmental, Health and Safety Manager, SPCC Coordinator Office: (718) 260- 5858 Mobile: (917) 797-9605

The SPCC Coordinator or designee will direct and coordinate the spill clean-up activities and evaluate if an environmental contractor will be required to perform the clean-up activities. The SPCC Coordinator will then initiate the notification procedures, as outlined in the following sections.

The SPCC Coordinator or designee will direct and coordinate the spill clean-up activities and evaluate if an environmental contractor will be required to perform the clean-up activities. The SPCC Coordinator will then initiate the notification procedures, as outlined in the following sections.

6.3 Internal Reporting Requirements

The following describes the internal spill "reporting" policy for NYCCT.

Report oil spills occurring on facility property or as a result of campus operations either onto land, or into or threatening to enter into a waterway. A NYCCT employee detecting such a situation (during normal operational hours) will notify the SPCC Coordinator. If a spill or leak occurs on weekdays, weekends, holidays, or during non-operational hours,

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the SPCC Coordinator or designee will also serve as the campus's Emergency Response Coordinator (ERC).

Table 6-1 presents the internal emergency contacts for NYCCT:

Table 6-1: Internal Emergency Contacts

Name	Work Telephone No.	Mobile Telephone No.
Mr. Luis Venegas Environmental, Health and Safety Manager/ SPCC Coordinator	(718) 260-5858	(917) 797-9605
Mr. James Vasquez Chief Superintendant of Buildings and Grounds	(718) 206-5337	
NYCCT Campus Security	(718) 260-5555	
Mr. Michael Spath CUNY Environmental Compliance Manager	(212) 794-5735	(917) 841-7463

The ERC has been assigned overall responsibility in coordinating responses to oil spill incidents and will contact other appropriate facility personnel, as necessary. The Emergency Response Coordinator will also direct NYCCT personnel to make contact with others listed on the emergency call list, as necessary.

The ERC will direct and coordinate the spill clean-up activities and evaluate if an environmental contractor will be required to perform the clean-up activities. In the event of an oil spill, Appendix L – *Spill History Form* will be used by NYCCT personnel to document the facts regarding the spill incident.

The ERC will then initiate the notification procedures, as outlined in the following sections.

6.4 External Reporting Requirements

Under the circumstances outlined below, EHSO will notify the appropriate regulatory authorities of spills and discharges of oil, as required. Prior to such agency notifications, the ERC will complete Appendix M – *Regulatory Agency Reporting Log.*



6.4.1 Reportable Quantities

As defined by 40 CFR 112.2, a spill event is a discharge (*e.g.*, spill, leak or release) of oil into or upon navigable waters of the United States or adjoining shorelines in harmful quantities, as defined by 40 CFR 110.

6.4.2 Federal Reportable Quantities

Pursuant to 40 CFR 110, an **IMMEDIATE** call is to be made to the National Response Center (NRC) at **1-800-424-8802**, **if** one of the following occurs:

- the amount of oil violates applicable state water quality standards
- the amount of oil causes a film or "sheen" upon or discoloration of the surface of the water or adjoining shorelines
- the amount of oil causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

If a call must be made to the NRC, NYCCT is also required to then contact the USEPA Region 2 at **(718) 482-4900.**

6.4.3 New York State Reportable Quantities

A variety of reporting obligations, some of them specifying different time periods for reporting, exist in New York State with respect to oil. [Please see the NYSDEC's *Final Guidance and Responsiveness Summary Regarding Petroleum Spill Reporting*.

In addition to any required federal reporting, the facility will report oil spills to the NYSDEC as soon as possible, **but not later than** *two* **hours after discovery**, unless the spill meets ALL of the following criteria:

- 1. The spill is known to be less than 5 gallons;
- 2. The spill is contained and under control by NYCCT personnel;
- 3. The spill has not and will not reach the State's water or any land;
- 4. The spill is cleaned up within two hours of discovery.

Note: For spills that are not required to be reported, the facts concerning the incident must be documented (use Appendix M - Regulatory Agency Reporting Log) and a record must be maintained for a period of at least one year.

In the event an oil spill does not meet all of the above criteria, the SPCC Coordinator will notify the NYSDEC at the "Spill Hotline" (**1-800-457-7362**) within two hours of discovery. As appropriate, NYCCT may also choose to notify the NYSDEC Region 2 office in Long Island City, New York (**718-482-4900**).



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Prior to NYCCT personnel calling a state or federal agency regarding a reportable oil spill, the following information should be collected:

- 1. Address and telephone number of the facility
- 2. Spill date and time
- 3. Type of oil product spilled
- 4. Location of spill
- 5. Weather conditions at the spill location
- 6. Estimate of the total quantity spilled
- 7. Estimate of the quantity spilled into navigable water
- 8. Source of the spill
- 9. Description of the affected media (water, air, land)
- 10. Cause of the spill
- 11. Damages or injuries caused by the spill
- 12. Actions used to stop, remove and mitigate the effects of the spill
- 13. Whether an evacuation was needed
- 14. Names of individuals or agencies that have also been contacted.

6.5 Spill Kits

Spill kits, absorbents, cleanup equipment and personal protective equipment (PPE) are available at accessible locations within the vicinity of each storage facility, where the necessary equipment can be accessed without delay in the event of a spill emergency. A list of locations of each emergency response supply center throughout the QC campus is presented in Table 1 along with the location of the designated storage facility it serves. The information provided in Table 1 will be instructed during SPCC training. (Furthermore, posted on each storage facility is the nearest emergency response center.)

6.6 Waste Disposal

Oil-contaminated debris resulting from oil releases to the environment (land or water) will be stored in the appropriate containers and shall be located in a designated area prior to disposal. Disposal will be performed in accordance with all applicable hazardous waste and/or solid waste regulations. If the debris is determined to be non-hazardous, it will be stored on-site pending disposal at a facility licensed to accept such waste. Records documenting the date of contaminated debris removal from the site and the location of ultimate disposal will be submitted to NYSDEC as necessary and in accordance with pertinent regulatory requirements.

Waste oils, oil contaminated shop rags, used sorbent powder and other oil contaminated items that are generated during routine facility operation will be stored separately and disposed of by an outside contractor. QC will follow all applicable solid waste and hazardous waste regulations.

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6.7 Contact Lists



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Minor spills or leaks that are properly contained and controlled will be handled by QC staff. In the event of a discharge with offsite impact, potential environmental contamination or possible threat of harm to site staff/users the following persons/entities are to be notified:

NYCCT Director of Security and Public Safety: (718) 260-5555 NYCCT Superintendent of Grounds and Buildings: (718) 260-5337 24 Hour Security: (718) 260-5555 NYC Fire/Police: 911 National Response Center: 800-424-8802 NYS Department of Environmental Conservation: 800-457-7362 Clean up Contractor: Triumvirate Environmental 42-14 19th Avenue Astoria, N.Y. 11105-1082 718-274-3339 800-427-3320

7.0 Facility Commitment

Full approval is extended by management at a level with authority to commit the necessary resources. NYCCT is dedicated to expeditiously control and remove any quantity of oil discharged that may be harmful to the environment.

8.0 Certification of Substantial Harm

Non-transportation on-shore facilities that, due to their locations, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on navigable waters or adjoining shorelines must prepare and implement a facility response plan in accordance with 40 CFR 112.20. Facilities that meet certain criteria are considered to pose substantial harm to the environment. A checklist of criteria for substantial harm is provided as part of the regulation and was used to determine that NYCCT does not meet the requirements for posing substantial harm to the environment. This certification is being prepared in accordance with 40 CFR 112.20 (Oil Pollution Prevention - Facility Response Plan) for QC. Per the responses noted below, the facility does not present a substantial harm to the environment, and therefore is not required to submit a response plan. The facility is required to maintain a copy of this certification on file. The certification will be updated if any changes in operation occur which may affect the facility's non-substantial harm status.

#	QUESTION	YES	NO
1	Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?		Х
2	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow precipitation within any aboveground oil storage tank area?		X
3	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located t at distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife in sensitive environments?		X
4	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?		Х
5	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?		Х

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

Name (print):

Signature:

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Title:

Date:

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9.0 **Responsibilities and Revisions**

Copies of the SPCC Plan are located in the Director of Environmental Health & Safety and the Chief Engineers Office – (See item 1.1 Plan Availability).

In accordance with 40 CFR 112.5(b), a review and evaluation of this Spill Prevention Control and Countermeasure (SPCC) Plan is conducted at least once every five years. NYCCT (QC) will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines per 40 CFR 112.3(d).

10.0 Facility Certifications

Name of Facility: <u>New York City College of Technology</u>					
Location of Facility:	300 Jay Street, Brooklyn, NY 11201				
Type of Facility	Educational Facility				
Regulated Activity:	Bulk Fuel Oil Storage for Heating and Operation of Emergency Generators				
Name and Address of Operator: <u>The City University of New York (CUNY).</u> 535 East 80th Street, New York, New York 10021					
Designated Person					
Responsible for Oil Spills: Luis Venegas, CIH, CSP Environmental Health and Saf					
Manager, SPCC Coordinator					

<u>Facility Commitment</u>- Full approval is extended by management at a level with authority to commit the necessary resources. NYCCT is dedicated to expeditiously control and remove any quantity of oil discharged that may be harmful to the environment.

Luis C. Venegas, CIH, CSP Director of Environmental Health & Safety



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11.0 Professional Engineer Certification

I, Chaitanya Bijoor, P.E., DEE , Senior Vice President of Warren & Panzer Engineers, P.C. hereby certify that as of $\frac{1/24/2013}{date}$:

- 1. I am familiar with the requirements of 40 CFR Part 112;
- 2. That I have visited and examined the facility;
- That the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112 and applicable New York State Regulations;
- 4. That procedures for required inspections and testing have been established; and
- 5. That the Plan is adequate for the facility.

Signature: Date: Registration No.: 052311



TABLE 1



TABLE 1 Bulk Petroleum Inventory and Spill Control Methods

New York City College of Technology

Tank/Contaiı er ID	n Type	Location (Indoors/Outdoors)	Capacity (Gallons)	Contents	Potential Types of Spills	Potential for Spill & Severity		Potential Spill Flow Direction	Receiving Water Body	Spill Prevention Measures	Spill Control Measures
					1) Container Rupture	Low	5,000	Radially across floor			
V-01	AST	Voorhees Building, B-8A	5,000	#2 Fuel Oil	2) Container Leak	Moderate	720	Radially across floor		10050	105
		(Indoors)			3) Container Overfill	Moderate	25	Radially across floor	East River	1,2,3,5,6	1,3,5
					4) Fill transfer line rupture; leakage	Low	1,000	Towards High St.			
					1) Container Rupture	Low	275	Radially across floor			
V-02	AST	Voorhees Building, B-15	275	Diesel Fuel	2) Container Leak	Moderate	275	Radially across floor	East River	1,2,3,5,7	2,5
		(Indoors)			3) Container Overfill	Moderate	25	Radially across ground	East River		
					4) Fill transfer line rupture; leakage		1,000	Radially across ground			
					1) Container Rupture	Low	275	Radially across floor			
V-03	AST	Voorhees Bldg. Roof Level	275	Diesel Fuel	2) Container Leak	Moderate	275	Radially across floor		1,2,4,6	2,5
		Mechanical Room (Indoors)			3) Container Overfill	Moderate	25	Radially across floor	East River		,
		(1100013)			,			Radially across floor	1		
					1) Container Rupture	Low	75	Radially across floor			
V-04	AST	Voorhees Bldg. B-17	75	Diesel Fuel	2) Container Leak	Moderate	75	Radially across floor	1	3,4,6	2
		(Indoors)			3) Container Overfill	Moderate	-	Radially across floor	East River	-,.,-	
								-	1		
					1) Container Rupture	Low	2000	Radially across ground			
E-03	AST	175 Pearl St. Bldg.	2 000	0 #2 Fuel Oil	2) Container Leak	Moderate		Radially across ground	1,2,5,6	1,5	
		(Outdoors)	_,		3) Container Overfill	Moderate		Radially across ground	East River	.,_,0,0	.,.
					4) Fill transfer line rupture; leakage	Low		Radially across ground			
					1) Container Rupture	Low		Radially across floor			
Reservoir	Elevator	r 175 Pearl St. Bldg. Rm 05	120) Hydraulic Oil		Moderate		Radially across floor	-	1,2	5
	Reservoir	(Indoors)					-		East River	.,_	
					1) Container Rupture	Low	50	Radially across bay floor			
N-02	AST	300 Jay Street Johnson	50	Diesel Fuel	2) Container Leak	Moderate	- 50		-	1,2	3
11 02	/.01	Street Loading Bay	00	Dicoci i dei	3) Container Overfill	Moderate		Radially across bay floor	East River	1,2	Ũ
		(Outdoors)				Moderate	20	, ,			
					1) Container Rupture	Low	275	Radially across bay floor			
N-03	AST	300 Jay Street Johnson	275	Diesel Fuel	2) Container Leak	Moderate		Radially across bay floor	-	1,2,3,5	3
11 00	/ 101	Street Loading Bay	215	Dieserruer	3) Container Overfill	Moderate	213		East River	1,2,0,0	U
		(Outdoors)				Moderate	20	, , , , , , , , , , , , , , , , , , ,			
					1) Container Rupture	Low	2000	Released to soil & GW			
N-04	UST	300 Jay Street Johnson	2 000	Diesel Fuel	2) Container Leak	Moderate		Released to soil & GW	-	1,3,4,5	1
		Street Loading Bay	2,000		3) Container Overfill	Moderate		Radially across pavement	East River	,=, .,•	ľ
		(Outdoors)			4) fill transfer line rupture; leakage	Moderate		Radially across pavement			
					1) Container Rupture	Low		Radially across bay floor			
N-05	AST	Street Loading Bay		5 Diesel Fuel	2) Container Leak	Moderate		Radially across bay floor	East River	1,2,5	2
			020		3) Container Overfill	Moderate		Radially across bay floor			–
		(Outdoors)			e, container evenin		- 20	,,	4		

Spill Prevention Measures:

1- NYCCT personnel utilize oil unloading/loading procedures to minimize the potential for a spill

2- NYCCT personnel conduct monthly visual inspections of the container and/or associated equipment to evaluate the condition and for the presence

leaking/spilled oil, or items that need to be repaired.

- 3- A high-level alarm is provided
- 4- A tank visual level gauge is provided
- 5- A leak detection system is provided

Spill Control Measures:

- 1- Surrounding soils would act as secondary containment. Tanks are leak tested on a regular basis, and have epoxy lining.
- 2- Container has integral secondary containment (double-walled).
- 3- Container is located within a constructed steel containment area.
- 4- Container/equipment is located indoors with a concrete floor and no drains.
- 5- 55-gallon drums located inside are staged on a secondary containment pallet.
- 6- 55-gallon drums located outside are staged inside a secondary containment enclosure.
- 7- Spill booms are positioned around open floor drains.

FIGURE 1

Topographic Map



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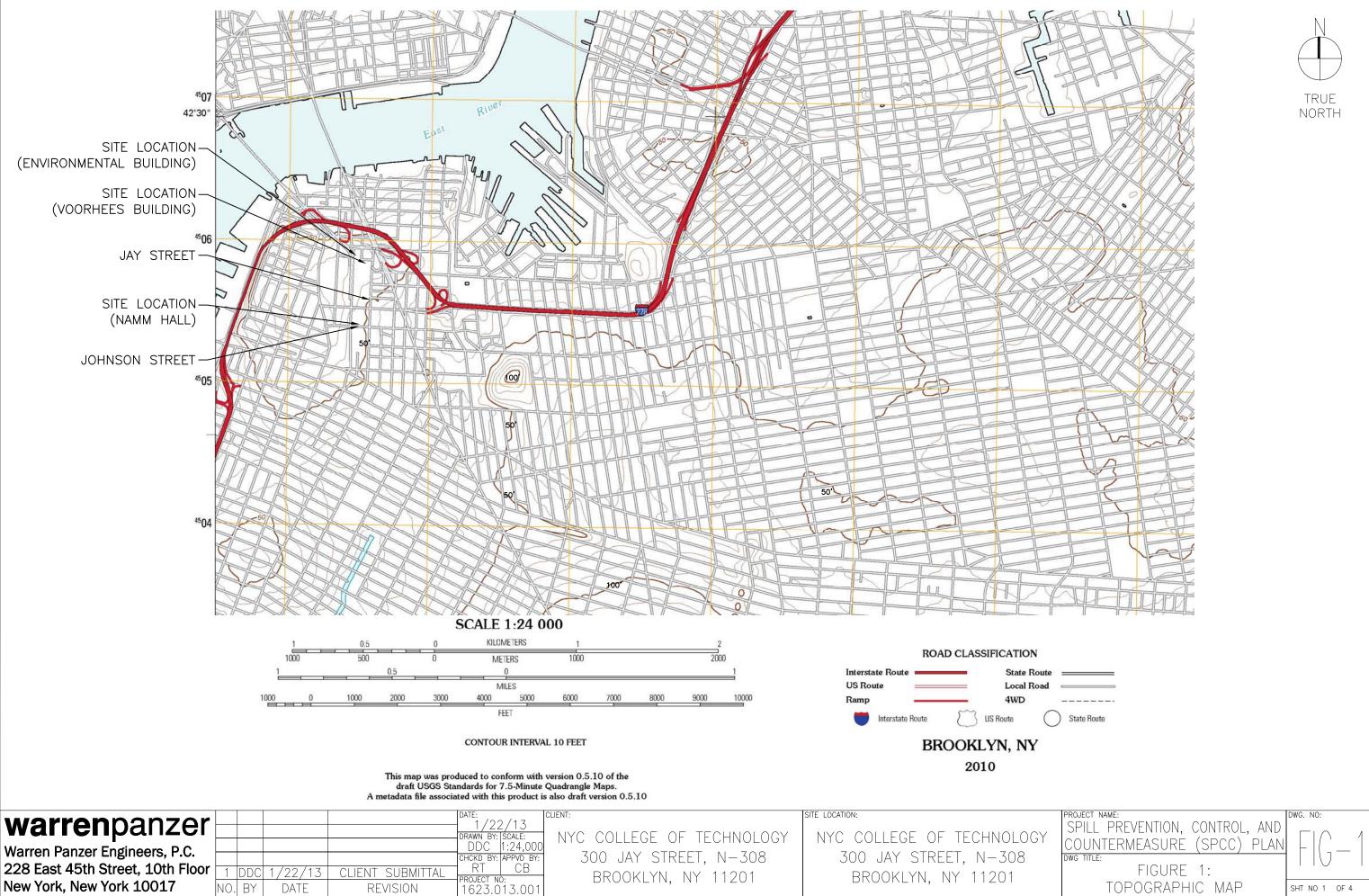


FIGURE 2

NAMM Hall Site Plan



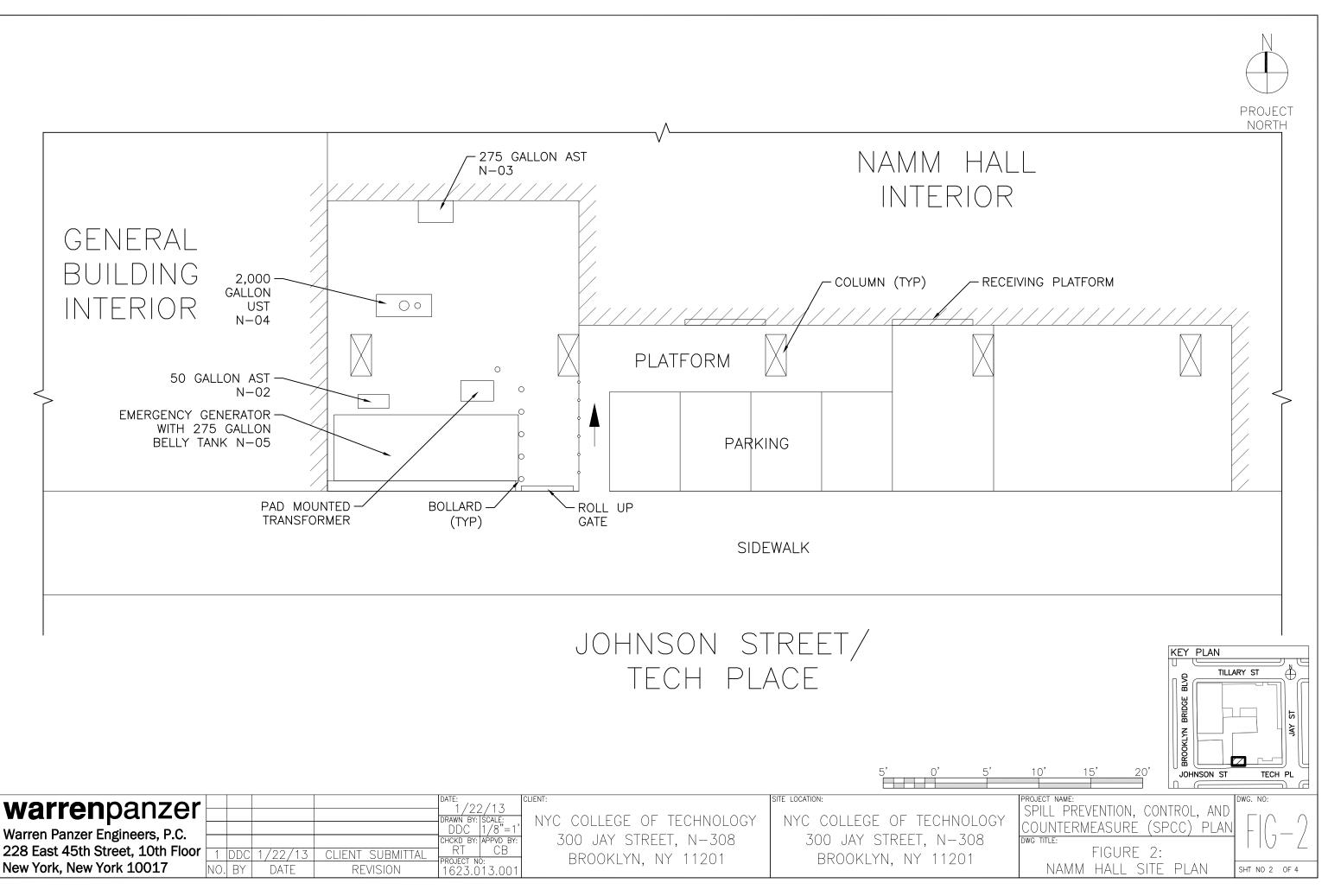


FIGURE 3

Voorhees Site Plan



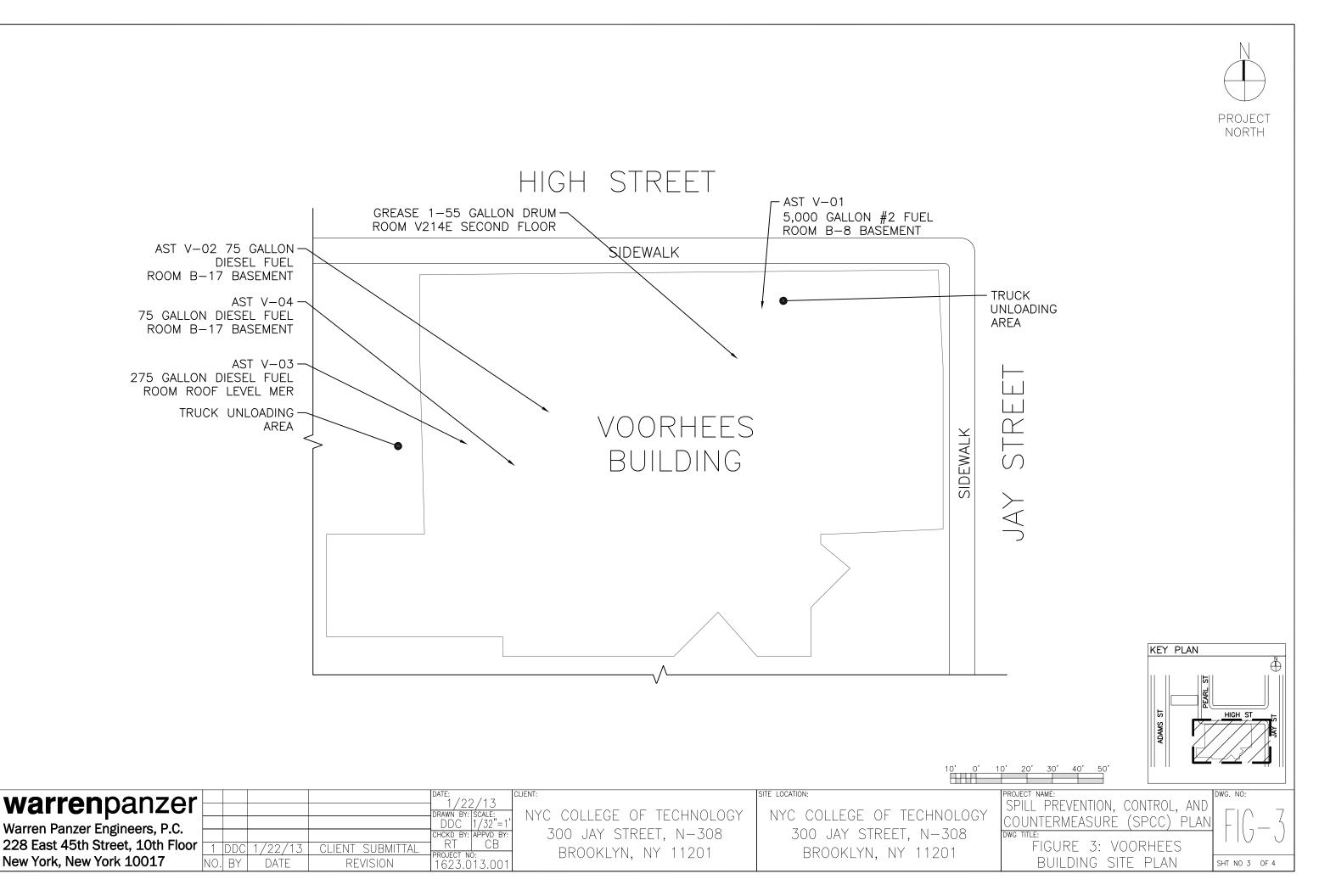
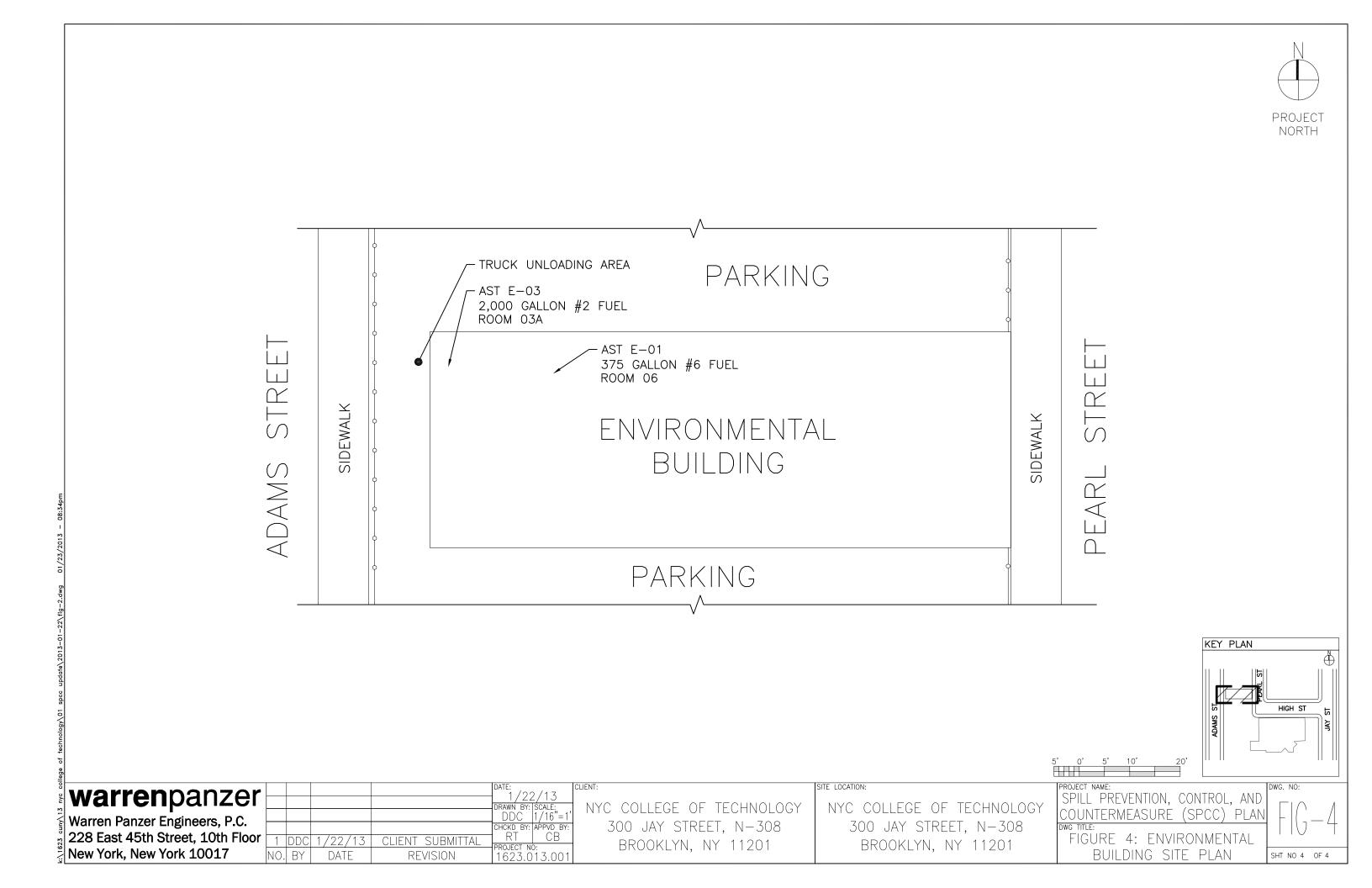


FIGURE 4

Environmental Building Site Plan





APPENDIX A

Certification of Applicability of the Substantial Harm Criteria



Certification of the Applicability of the Substantial Harm Criteria

In accordance with 40 CFR Part 112, Appendix C, Attachment C-II, the following identifies whether a facility "could reasonably be expected to cause substantial harm to the environment by discharging into or on the navigable waters of adjoining shorelines."

Facility Name:New York City College of TechnologyFacility Address:300 Jay Street, Brooklyn, NY 11201

If there is a "yes" answer to one or more of the following five questions, then a USEPA Facility Response Plan is required to be prepared.

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

Yes ____ No _

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

Yes No 📾

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in 40 CFR 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "*Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments*" and the applicable Area Contingency Plan.

- 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or comparable formula ^{1}) such that a discharge from the facility would shut down a public drinking water intake^{2}?
 - {1} If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.
 - {2} For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).



5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes ____ No 🚈

Certification

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

Signature:	Title:
Name:	_ Date:



APPENDIX B

SPCC Plan – Review and Evaluation Form



Appendix B

SPCC Plan – Review and Evaluation Form

New York City College of Technology

Brooklyn, NY

In accordance with 40 CFR Part 112.5(d), the following provides for the required documentation of the review and evaluation of the New York City College of Technology SPCC Plan.

Date of SPCC Plan review:	
Review performed by: (print name) (signature)	"I have completed the review and evaluation of the NYCCT SPCC Plan on (date), and <u>will / will not</u> (circle one) amend this SPCC Plan as a result."

Date of SPCC Plan review:	
Review performed by: (print name)	"I have completed the review and evaluation of the NYCCT SPCC Plan on (date), and <u>will / will not</u> (circle one) amend this SPCC Plan as a result."
(signature)	

Date of SPCC Plan review:	
Review performed by: (print name)	"I have completed the review and evaluation of the NYCCT SPCC Plan on (date), and <u>will / will not</u> (circle one) amend this SPCC Plan as a result."
(signature)	

Make additional copies of this page, as necessary.

APPENDIX C

SPCC Plan Regulatory Cross – Comparison Matrix



Appendix C

SPCC Plan Regulatory Cross – Comparison Matrix

New York City College of Technology

Revised Rule	Former Rule	Description of Rule	SPCC Plan (Location)	
Subpart A, 112.7	112.7	General requirements for SPCC Plans for all facilities and all oil types.	Section 3	
Subpart A, 112.7(a)	Not in former rule	General requirements; discussion of facility's conformance with rule requirements; deviations from SPCC Plan requirements; facility characteristics that must be described in the SPCC Plan; spill reporting information in the SPCC Plan; emergency procedures.	Section 3	
Subpart A, 112.7(b)	112.7(b)	Fault analysis - including prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of major equipment failure.	Section 3.6 and Table 1	
Subpart A, 112.7(c)	112.7(c)	Secondary containment systems.	Section 3.7 and Table 1	
Subpart A, 112.7(d)	112.7(d)	Demonstration of practicability - contingency SPCC planning, written commitment of manpower.	Section 3.8	
Subpart A, 112.7(e)	112.7(e)(8)	Inspections, tests, and records.	Section 3.9 and Appendices: F, G, H, I, K, and L	
Subpart A, 112.7(f)	112.7(e)(10)	Employee training and discharge prevention procedures.	Section 3.10	
Subpart A, 112.7(g)	112.7(e)(9)	Security (excluding oil production facilities).	Section 3.11	
Subpart A, 112.7(h)	112.7(e)(4)	Tank truck loading/unloading areas (excluding offshore facilities).	Section 3.12 and Appendix D	
Subpart A, 112.7(i)	Not in former rule	Brittle fracture evaluation requirements.	Section 3.13	
Subpart A, 112.7(j)	112.7(e)	Conformance with State requirements.	Section 3.14	
Subpart A, 112.7(k)	Not in former rule	Oil-filled operational equipment.	Section 3.15	



Appendix C

SPCC Plan Regulatory Cross – Comparison Matrix

New York City College of Technology

Revised Rule	Former Rule	Description of Rule	SPCC Plan (Location)	
Subpart B, 112.8 112.12	112.7(e)(1)	Requirements for onshore facilities (excluding production facilities).	Section 4	
Subpart B, 112.8(a)	Not in former rule	General and specific requirements.	Section 4	
Subpart B, 112.8(b)	112.7(e)(1)	Facility drainage.	Section 4.2	
Subpart B, 112.8(c)	112.7(e)(2)	Bulk storage containers.	Section 4.3	
Subpart B, 112.8(d)	112.7(e)(3)	Facility transfer operations, pumping, and facility process.	Section 4.4	
Subpart B, 112.9	112.7(e)(5)	Requirements for onshore production facilities.	N/A	
Subpart B, 112.9(a)	Not in former rule	General and specific requirements.	N/A	
Subpart B, 112.9(b)	112.7(e)(5)(ii)	Oil production facility drainage.	N/A	
Subpart B, 112.9(c)	112.7(e)(5)(iii)	Oil production facility bulk storage containers.	N/A	
Subpart B, 112.9(d)	112.7(e)(5)(iv)	Facility transfer operations, oil production facility.	N/A	
Subparts B & C 112.10 112.14	112.7(e)(6)	Requirements for onshore oil drilling and workover facilities.	N/A	
Subpart B & C 112.10(a) 112.14(a)	Not in former rule	General and specific requirements.	N/A	



Appendix C

SPCC Plan Regulatory Cross – Comparison Matrix

New York City College of Technology

Revised Rule	Former Rule	Description of Rule	SPCC Plan (Location)	
Subparts B & C 112.10(b) 112.14(b)	112.7(e)(6)(i)	Mobile drilling facilities.	N/A	
Subpart B & C 112.10(c) 112.14(c)	112.7(e)(6)(ii)	Secondary containment - catchment basins or diversion structures.	N/A	
Subpart B & C 112.10(d) 112.14(d)	112.7(e)(6)(iii)	Blowout prevention (BOP).	N/A	
Subpart B & C 112.11 112.15	112.7(e)(7)	Requirements for offshore oil drilling, production, or workover facilities.	N/A	
Subpart B & C 112.11(a) 112.15(a)	Not in former rule	General and specific requirements.	N/A	
Subpart D 112.20(a)	112.20(a)	Certification of Substantial Harm	Appendix A	



APPENDIX D

Tanker Truck Unloading/Loading Procedure



Appendix D

Tanker Truck Unloading/Loading Procedure

New York City College of Technology

Brooklyn, NY

- □ Upon notification that the tanker truck has arrived at the New York City College of Technology (NYCCT) campus, the appropriate NYCCT personnel will direct the truck to the unloading area.
- □ NYCCT personnel must bring appropriate and available oil spill response equipment to the truck unloading area.
- Prior to any unloading activities, NYCCT personnel will instruct the truck driver to turn off the truck (if appropriate), and verbally request that he/she must not smoke during the entire unloading procedure.
- □ NYCCT personnel will review delivery paperwork to confirm that the correct product and amount is being delivered, and verify that all associated high-level alarms and gauges are functioning properly prior to product transfer.
- □ NYCCT personnel must check the liquid level in the storage tank prior to filling the tank to confirm that the available volume in the tank is greater than the volume to be transferred.
- NYCCT personnel will then give permission to the truck driver to unload the delivery.
 (Note: It is the responsibility of NYCCT personnel to ensure that the truck driver is properly following the procedures specified.)
- □ NYCCT personnel and the truck driver must remain **DURING THE ENTIRE UNLOADING PROCEDURE**.
- The truck driver will visually assess (prior to connection to the fill port) the tanker truck transfer line for signs of corrosion, cracks, or other similar characteristics. In addition, transfer line connections will also be evaluated by the truck drivers to verify that adequate gaskets are located in the fill port fitting and place absorbent sheet materials beneath all connections.

If at any time a leak is observed, the pump will be immediately turned off and actions will be taken to prevent additional material from leaking and the emergency and spill response/ notification procedures in **SECTION 5** will be initiated. Under no circumstance will the carrier fill the tank beyond the working capacity.

- **D** The truck driver will then visually observe the complete unloading process.
- Following the delivery to the tank(s), the drain valve on the truck is to be closed by the driver, and the transfer line is to be drained before disconnecting. Containers will be placed under couplings prior to disconnection to catch any residual material. The truck driver will then record the quantity of material delivered.
- □ Prior to tanker truck departure, the lower-most drain and all outlets must be closely examined by the truck driver for leakage and, if necessary, tightened, adjusted or replaced to prevent any material from leaking while in transit.
- □ The truck driver shall then give receipt of delivery to NYCCT personnel. This receipt shall be retained for documentation records associated with this SPCC Plan.



APPENDIX E

Oil/Petroleum Response, Cleanup and Disposal



Appendix E

OIL/PETROLEUM RESPONSE, CLEANUP AND DISPOSAL

For assistance, contact: SPCC COORDINATOR Luis Venegas (718) 260-5858 Office (917) 260-5858 Mobile

Response

In the event of an oil spill or leak, the person discovering the oil from a storage container, tank or equipment must immediately initiate the following actions:

- 1. Contact Public Safety at (718) 260-5550 with the location and nature of the spill.
- 2. If there is an immediate threat to human health, evacuate the immediate area.
- 3. Extinguish all sources of ignition and isolate incompatible or reactive chemical substances if possible without exposing personnel to unsafe conditions.
- 4. Isolate all potential environmental receptors such as floor drains, catch basins, sumps, exposed soil, and runoff areas.
- 5. Attempt to stop or contain the spill/release at source [provided there are no health or safety hazards and there is a reasonable certainty of the origin of the leak].
- 6. Contact the following to provide information regarding the spill event:

Luis Venegas Environmental Health and Safety Manager/ SPCC Coordinator/ERC: (718) 260-5858 (Office) (917) 797-9605 (Mobile)

Federal reportable quantities

Pursuant to 40 CFR 110, an **IMMEDIATE** call is to be made to the National Response Center (NRC) at **(800) 424-8802**, <u>if</u> one of the following occurs:

- the amount of oil violates applicable state water quality standards
- the amount of oil causes a film or "sheen" upon or discoloration of the surface of the water or adjoining shorelines
- the amount of oil causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

For state specific reporting requirements, see Section 5 of the SPCC Plan.

In the case of an emergency spill that <u>poses a threat to human health or property</u>, immediately **call Public Safety at** (718) 260-5550 to summon outside emergency responders. Take only those actions to stop or minimize the spill that does not pose a threat to human health. Evacuate the area as necessary.

Cleanup and Disposal

Once spills have been contained, absorbed or segregated from a vulnerable area, they must be disposed of properly.

A disposal determination shall be made by the SPCC Coordinator.

Any free product in a liquid state shall be containerized in waste cans or 55-gallon drums. Arrangements shall then be made for proper pickup and disposal in accordance with applicable regulations. Any solid materials associated with an oil or fuel spill (except gasoline) such as absorbent pads, pigs, and clay chips are generally not considered hazardous and may potentially be disposed of in typical waste receptacles following a hazardous waste determination. However, solid materials used in the cleanup should also be contained and arrangements made for proper pickup and disposal.



APPENDIX F

Employee Training Attendance Record



Appendix F

SPCC Plan – Employee Training Attendance Record

New York City College of Technology Brooklyn, NY

Training Date:	
-	

Instructor:_____

Training Location:_____ Training Topic(s):_____

In accordance with 40 CFR Part 112.7(f)(1), the New York City College of Technology (NYCCT) is required to provide oil-handling personnel with oil spill prevention and control training. This training will be conducted annually for existing employees and within two weeks (from the time of hire) for new employees. An employee's signature on this form is an acknowledgment of receiving this training.

I acknowledge that I have received oil spill prevention training, and that the following subjects have been covered:

- Discussion of why an SPCC Plan is required by the USEPA
- Overview of applicable regulations, including NYSDEC's Petroleum Bulk Storage regulations
- Overall review of the NYCCT's SPCC Plan
- Description of the operation and maintenance of equipment to prevent the discharge of oil
- NYCCT's requirements for oil spill discovery, initial response actions, and necessary internal and external notifications
- Spill containment, control, and cleanup procedures and techniques
- Discussion of past facility spill events

Employee Name (print)	Employee Name (signature)	Date



Employee Name (print)	Employee Name (signature)	Date

Make additional copies of this form, as necessary.



APPENDIX G

Monthly Tank Inspection Log



APPENDIX G Monthly Tank Inspection Log New York City College of Technology 300 Jay Street Brooklyn, NY 11201-1909

Facility Registration Number 2-601217			Inspector:		
Identification Number for Tank Tank Registered: (Yes/No/N/A)		_ Tank Description: Tank Location:			
Registration Certificate Posted:					
(Yes/No/N/A)				TED FORM TO	D: (1) COPY
Date of Inspection:			DINGS AND C		ATOD
Time of Inspection:		AND (2) COPY TO SPCC COORDINATOR			
Note: In addition to this monthly SPCC		С	HECK APPRO		(S)
inspection, other NY State requirements for				Repair or	Additional
USTs may be required to be performed and	Sa	tisfactory	Not	Adjustment	Comments
documented. See Section 2.3.2 of this SPCC Plan.		,	Applicable	Required	Attached
BULK STORAGE TANKS					
Tank surface checked for signs of leakage					
Tank condition is considered good (not rusting, no signs of corrosion or pitting)					
No signs of separation or swelling of tank					
Bolts, rivets, and/or seams are not damaged and appear in good condition					
No signs of excessive settlement of AST					
Level gauges and alarms are working properly (Press test button if provided)					
Vents are not obstructed					
Valves, flanges, and gaskets are free from leaks					
TRUCK LOADING/UNLOADING AREA					
Fill ports are properly color-coded and labeled					
No standing water in loading/unloading containment area					
Warning signs are posted in area					
Fill port containment does not have standing water					
Drip pans are not overflowing (or have standing water)					
Containment curbing is in good condition					
Fill port connections are capped or blank-flanged					
SPILL PREVENTION EQUIPMENT Spill prevention equipment is maintained at tank location					



APPENDIX G Monthly Tank Inspection Log New York City College of Technology 300 Jay Street Brooklyn, NY 11201-1909

Spill prevention equipment is in good condition with adequate supplies			
TANK PIPELINES			
Pipe surfaces checked for signs of leakage			
No signs of corrosion to pipelines or pipe supports			
Buried pipelines are not exposed			
Out-of-service pipelines are capped			
Signs/barriers to protect aboveground pipes from vehicles are present			
No leaks at valves, flanges, or other fittings			
SECONDARY CONTAINMENT AREA			
Containment area drainage valves are closed and are locked			
Containment area (Interstitial space for double- walled tanks, diking for single-walled tanks) does not have signs of leakage			
Containment area pumps are working properly			
No visible oil sheen in containment area (if so, water must not be drained to ground surface)			
No standing water in containment area			
Containment structure is free from cracks or holes			
SECURITY MEASURES			
Fence around tank is in good condition			
Fence gate (or door) is locked			
Available lighting system works properly			
I CERTIFY THAT TANK INSPECTION COMPLIES W CONSISTENT WITH 40 CFR 112.8(C) AND 6 NYCR	S BEEN PERF	ORMED IN A I	MANNER
Name of person completing this form			
Title:			
Signature:			

Date:

IN THE EVENT OF A SPILL OR RELEASE IMMEDIATELY CONTACT THE SPCC COORDINATOR AT (718) 368-4778



APPENDIX H

Drum Storage and Handling Inspection Record



Appendix H

Drum Storage and Handling Inspection Record

New York City College of Technology

Brooklyn, NY

Facility Location:	Date/Time:			
	Name of inspector:			
Item to inspect	Acceptable	Unacceptable	Corrective Action	
Storage and work areas are free of spills/leaks				
Containers are not leaking, rusted or deteriorated				
Containers have closed lids or bung holes				
Incompatible materials are separated (not stored together)				
Containers are stored off the floor/ground, and in containment areas				
Containment areas are free of debris and accumulated liquids				
Containment/drainage structures are intact, no cracks or breaches				
Available spill cleanup equipment is operational and complete				
Storage/handling equipment is properly used, in good condition				
Clean/orderly areas, adequate aisle space				
Containers are appropriately labeled				
Comments on unacceptable items:				

Inspector Signature:_____



APPENDIX I

Oil-Containing Equipment Reservoir Inspection Checklist



Appendix I

Oil-Containing Equipment Reservoir Inspection Checklist

New York City College of Technology

Provide description of oil container (<i>i.e.</i> , elevator hydraulic reservoir), including storage capacity, building and specific location):				
		YES	NO	
1.	Is the reservoir leaking?			
2.	Are any pipes, valves, or pumps leaking?			
3.	Are any hydraulic hoses leaking?			
4.	Are there any oil stains on the exterior reservoir walls?			
5.	Are there any oil or petroleum products on the ground around the reservoir			
	or machinery or in the secondary containment area?			
6.	Are there any indications of corrosion at fitting joints or seals?			
7.	7. Are there any raised spots or dents on the reservoir surface?			
8.	Does it appear that the foundation has shifted or settled?			
9.	Are there cracks in the equipment supports?			
10.	Are any of the oil-related labels or signs illegible or missing?			
11.	Is oil-containing equipment or container susceptible to physical damage (<i>i.e.</i> , motor vehicles, falling objects, etc.)?			
12.	If rainwater is present in the secondary containment area, does sufficient volume remain for spill control?			



General Comments/Observations, Procedure Deficiencies:

Appendix I (continued)

Oil-Containing Equipment Reservoir Inspection Checklist

New York City College of Technology

Brooklyn, NY

If a "yes" answer was recorded for any of the Items 1 through 11, or a "no" answer was recorded for Item 12, corrective action is required. Describe action taken and the date below:

Name of Person Performing Inspection

Date

Signature



APPENDIX J

Emergency Containment and Cleanup Supplies



Appendix J

SPCC Plan – Emergency Containment and Cleanup Supplies

New York City College of Technology Brooklyn, NY

The following presents an inventory of the available emergency containment and cleanup supplies (associated with oil leaks and spills) at New York City College of Technology:

Building	Room	Equipment Type	Manufacturer Information
Voorhees	V-01 Fill Port (Loading Dock V- 105C)	Wall-mounted Universal Spill Kit	WYK Stock #1506
Voorhees	V-02 Boiler Room Platform Area	95-gallon Universal Overpack	Grainger Item 5UZ65
Voorhees	V-09 Stock Room	95-gallon Universal Overpack	Grainger Item 5UZ65
Voorhees	V-01 Tank Room (V- 08A)	Zipper Bag Oil Spill Kit	CEP-ASK-20-O
Voorhees	V-03 Tank Room (Roof)	Loose Spill Pads	
Voorhees	V-02 Tank Room (V- 15)	Universal Duffel Bag Spill Kit	WYK Stock #1501
Environmental	1 st Floor Lab (E-102)	95-gallon Universal Overpack	Grainger Item 5UZ65
Environmental	Boiler Room (E-03)	Zipper Bag Oil Spill Kit	CEP-ASK-20-O
Environmental	3 rd Floor Lab (E-302)	4 Absorbent Socks/ 2 Absorbent Blankets	



APPENDIX K

Regulatory Agency Reporting Log



Regulatory Agency Reporting Log

New York City College of Technology Brooklyn, NY

A. Name of New York City College of Technology Personnel Making Phone or Person Contact:

B. Date and Time of Conversation:

C. Name of Agency, Person Contacted and Title: _____

- D. Location of Agency: _____
- E. Nature of Incident Reported:
- F. Verbal Commitments (if any) made by New York City College of Technology Personnel:
- G. Demands Requested by Agency: _____
- H. Verbal Commitments (if any) Made by Agency:

Additional/Supporting Comments:

NYSDEC SPILL HOTLINE: 1-800-457-7362 or 1-718-482-4929 (Region 2 office)	USEPA National Response Center: 1-800-424-8802
Fire Department: 911	Triumvirate, Inc.: 1-800–427-3320

Page ____ of ____



APPENDIX L

Spill History Form



Spill History Form

Appendix L

New York City College of Technology

Brooklyn, NY

INSTRUCTIONS: Use this form to record any spills at the facility. The **Environmental**, Health and Safety Officer must receive and maintain a copy of the completed form. Reported By:_____ Date:_____ Time:____ [AM] [PM] Α. Β. Location of Spill: Fluid Type:_____ Quantity (gallons): _____ C. Weather Conditions (Sunny, Rain, Snow, Wind Direction, Temperature, etc.): D. Watercourse Affected: E. F. Control Measure Taken: G. Personnel Involved: Estimated Property Damage and Cost of Cleanup: ____ Η. Ι. Disposal of Contaminated Materials: J. Cause of Spill: Κ. Action(s) Taken to Prevent Recurrence:

Page ____ of ____

