Introduction

The purpose of this policy is to establish guidelines and precautions to ensure both personnel safety and prevention of spills or accidental releases during routine handling or transferring of oil derived products at all ETSU facilities.

ETSU has an aboveground storage capacity exceeding 1,320 gallons of oil in containers 55 gallons or larger, therefore, the facility is subject to the federal regulation for Oil Pollution Prevention, 40 CFR 112.

This policy complies with the requirements of 40 CFR 112.3 and 112.5 of the Spill Prevention, Control, and Countermeasures (SPCC) Plan regulations.

Scope

This policy shall apply to all employees in Facilities Management, outside contractors and their representatives hired by ETSU to provide oil transfer services on ETSU property.

Definitions

Oil: As defined by 40 CFR 112 means oil of any kind or in any form, including, but not limited to: fats, oils, greases of animal, fish, or marine mammal origin, vegetable oils, including oils from seeds, nuts, fruits or kernels; and other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Navigable Waters: Are considered by regulations to mean practically all surface bodies, streams, and wetlands.

SPCC Plan: Spill Prevention, Control and Countermeasures Plan. Purpose is to establish procedures, methods, equipment and other criteria to prevent the discharge of oil into navigable waterways.

Spill Prevention: System components and characteristics and operating procedures to prevent oil spills.
**Spill Control:** Control measures to prevent a spill from entering navigable waters.

Spill Countermeasures: Means to contain, cleanup and mitigate the effects of an oil spill that could impact waterways.

**Release:** Any spilling, leaking, pumping, pouring, escaping, leaching or disposing into the environment.

**Reportable Quantity:** A spill of 25 gallons or more to the environment.

**Bulk Delivery Procedure**

Precautions are taken to ensure both personnel safety and prevention of spills or accidental releases during routine handling of oil. Visual checks for leaks before, during, and after material transfers provide operating personnel with the opportunity to contain releases due to faulty equipment, and to implement proper repair measures. ETSU employs delivery procedures designed to prevent accidental spills and releases during the bulk transfer of oils and other materials. Examples would be filling of our 4,000-gallon diesel UST, the 15,000-gallon E-10 UST or any of the emergency generator diesel tanks located throughout the campus.

Bulk oil is delivered using the following procedures:

- Loading and unloading is only performed under the supervision of campus personnel responsible for ensuring that proper procedures are followed.
- Oil absorbent and containment materials must be available and sufficient to prevent spills from reaching navigable waters.
- Wheel chocks or a vehicle break interlock system must be employed to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines or hoses.
- Bonding and grounding devices must be connected before loading or unloading flammable oils from vehicle.
- Campus personnel and pump operator/driver must check all connections for tightness and that all fittings and hoses are in a safe and operable condition before beginning any pumping of oil.
- Where connections are not located within a secondary containment structure, a drip pan must be placed below the connection during the filling process.
- The operator of the pump shall not leave the pumping process unmanned for any reason during the filling process and shall remain within close proximity (five feet) of the shutoff valve at all times.
- When a high level alarm is not operational or available on the container being filled, an employee must gauge the container during filling operations and be in constant communication with the pump operator.
- After pumping is complete, the pump operator must check that all shutoff valves are locked in the closed position and there is no leakage.
- Prior to filling and departure of any tank car or tank truck, the lowermost drain and all outlets of such vehicles must be closely inspected for discharges, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge.
- Connections on oil tank or campus piping must be securely capped, plugged, or sealed when not in service or when in standby service for an extended time.
Bulk Oil Collection/Pickup

Used petroleum oils generated during maintenance activities transferred by ETSU personnel via 5-gallon containers are placed directly into the 275-gallon polyurethane used oil storage tank. Collected used oil is periodically picked up via tanker trucks that park adjacent the used oil tank. In general, the operator collects the used oils using a hand-held nozzle and flexible tubing from a vacuum tanker connected directly to the truck.

Container Loading/Unloading

Portable containers (drums, totes) of oils and oil-based products are generally delivered at the Facilities Management Building or Central Receiving. The drums are then taken directly to the point of use by hand cart, fork lift or utility vehicle. Portable containers are loaded and unloaded using the following procedures:

- All containers must be closed and sealed prior to moving.
- No obstacles should block the unloading area or delivery paths.
- Safe lifting techniques must be used.
- Loads must not be stacked on the transport mechanism or vehicle in a manner that blocks the operator’s vision.
- Heavy objects should be loaded at the bottom of a forklift, hand truck, or pallet jack.
- Bulky or awkward items should be secured while in transport.
- Only trained and authorized personnel are allowed to operate a forklift or use other powered material-handling equipment.
- Containerized materials are stacked and stored properly in a stable and secure manner.

Elevator Hydraulic Oil Tanks

Oil is rarely added to or removed from these small tanks. When required, addition of oil is performed manually using small containers by qualified, contracted elevator service technicians. Removal of oil would only be required in the event of tank repair or replacement. In this event, oil would be manually removed from the tank by portable pumps and placed in containers.

Electrical Transformers

Typically, oil is neither added to nor removed from transformers except in the event of repairs. Addition or removal of oil from transformers is only performed by trained and qualified electricians.

Responsibilities

All Facilities Management employees involved with the delivery or transfer of oil derived products are responsible for adhering to this policy. All Facilities Management Directors and Supervisors will ensure that their subordinates adhere to this policy.
References

40 CFR 112.3 and 112.5.

ETSU Spill Prevention, Control, Countermeasures Plan located in the Environmental Compliance Manager’s Office.

Contact Persons

Director of Environmental Health and Safety
Environmental Compliance Manager

Approved by: ______________________________________
William Brady Rasnick, Jr., Associate Vice President, Facilities Management

Date approved: ________________________________