CLAYTON STATE UNIVERSITY
2000 CLAYTON STATE BLVD
MORROW, GEORGIA 30260

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES (SPCC) PLAN

November 11, 2015
rev. to contacts
10/2018

CDM Smith

Professional Engineer Certification

Clayton State University's Spill Prevention, Control, and Countermeasures (SPCC) Plan has been reviewed and certified by a registered profession engineer, as shown below.

I hereby attest that:

- I am familiar with the requirements of 40 CFR 112;
- I or my agent has visited and examined:

  Clayton State University
  2000 Clayton State Blvd.
  Morrow, Georgia, 30260

- The SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR 112;
- Procedures for required inspections and testing have been established; and
- The SPCC Plan is adequate for the facility.

Professional Engineer: Jeffrey Weeber (*Print or type name)*

Signature: _____ Date:_____

PE Registration Number: 32278

State: Georgia

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Section 1
Introduction

1.1 Purpose

This Spill Prevention, Control and Countermeasure Plan (SPCC Plan or Plan) was prepared by CDM Smith Inc. for Clayton State University (CSU) at 2000 Clayton State Blvd. in Morrow, Georgia. The purpose of the SPCC Plan is to describe the university's operating practices intended to prevent potential spill events and to minimize the impact of any spills to human health and to the environment. In the unlikely event that an oil spill occurs, this Plan outlines facility response efforts. This SPCC Plan is an update from the original SPCC plan prepared in 2011, and incorporates several revisions and additions that have occurred at the site since 2011.

This Plan has been prepared to meet the requirements of Title 40, Code of Federal Regulations, Part 112 (40 CFR Part 112) – Oil Pollution Prevention. In addition to fulfilling regulatory requirements, this SPCC Plan is used as a reference for oil storage information, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

This facility is subject to the SPCC rule because it meets three criteria:

- It is non-transportation related.
- It has an aggregate aboveground storage capacity greater than 1,320 gallons.
- There is a reasonable expectation of a discharge into or upon navigable waters of the United States.

1.1.1 Applicability

This Plan applies to all work operations at our university where employees may be exposed to potential oil discharge situations under normal working conditions or during an emergency situation.

1.1.2 Responsibility

The Director of Facilities Management for CSU is responsible for developing and maintaining this Plan and for making sure that the Plan is available to the EPA Regional Administrator for on-site review during normal working hours. Copies of the written Plan are located at Public Safety and are available twenty-four hours per day and seven days a week, and also at Facility Management.

1.2 Plan Administration

1.2.1 Management Approval

We are committed to the prevention of discharges of oil to navigable waters and the environment. This Plan has the full approval of management at a level of authority to commit the necessary resources to fully implement it.

Responsible Officer: _____ (*Print or type name*)

Title: _____

Signature: _____ Date: _____

1.2.2 Location of the SPCC Plan

A complete copy of this Plan is maintained at the university with Public Safety and Facility Management. Normal operation hours for the office are Monday through Friday from 8am to 5pm, however, the plan is available at any time at Public Safety. Public Safety can be reached at any time in the event of a spill. (Please refer to Section 2.2 for contact information).

1.3 Plan Review

1.3.1 Amendment by the Regional Administrator

If this facility discharges (i.e. spills): (1) more than 1,000 U.S. gallons of oil in a single discharge, or (2) discharged more than 42 U.S. gallons of oil in each of two discharges, occurring within any twelve month period, a written report must be submitted to the Regional Administrator of the U.S. EPA within 60 days. Refer to Section 5.4 for additional report information.

1.3.2 Plan Amendments Due to Facility Changes

The Director of Physical Plant will amend this SPCC Plan in accordance with Section 112.7 and other applicable Sections of Part 112, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. The amendment will be prepared within six months of the change. Examples of changes that may require amendment to the Plan include, but are not limited to:

- Commissioning or decommissioning containers;
- Replacement, reconstruction, or movement of containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures;
- Changes of product or service; or
- Revision of standard operation or maintenance procedures at the facility.

1.3.3 Scheduled Plan Reviews

The Director of Physical Plant reviews this Plan **at least once every five years** from the date the facility becomes subject to 40 CFR 112 and **five years** from the date of the last review. Amendments are then prepared within six months of the review. Any technical amendments to

the SPCC Plan are certified by a professional engineer or self-certified. Self-certification is permitted based on 10,000 gallons or less in aggregate aboveground oil storage capacity at CSU, and not having had (1) a single discharge of oil to navigable waters exceeding 1,000 U.S. gallons or (2) two discharges of oil to navigable waters each exceeding 42 U.S. gallons. Certification is not required for non-technical amendments like changes to telephone numbers, names, etc. The plan review dates and certifications (as necessary) are included in **Appendix A**.

1.4 Cross-Reference with SPCC Provisions

This SPCC Plan does not follow the exact order presented in 40 CFR Part 112. Section headings identify, where appropriate, the relevant sections of the SPCC rule. The following table (Table 1-1) presents a cross-reference of the Plan sections relative to applicable parts of 40 CFR Part 112.

Table 1-1: Cross-Reference with SPCC Provisions

Regulation Section	Regulatory Requirement	Location in SPCC
112.3(d)	Professional Engineer certification	Page 1
112.3(e)	Location of SPCC Plan	Section 1.2.2
112.5	Plan review	Section 1.3
112.7	Management approval	Section 1.2.1
112.7	Cross-Reference with SPCC Rule	Section 1.4
112.7(a)(3)	General facility information, site plan, and facility diagram	Section 2 Figures 2.1, 2.2, and 2.3
112.7(a)(4)	Discharge notification	Section 5.4 Table 5-1
112.7(a)(5)	Discharge response	Section 5
112.7(b)	Potential discharge volumes and direction of flow	Section 3 Tables 2.2 and 3.1 Figures 2.2 and 2.3
112.7(c)	Containment and diversionary structures	Section 4.7
112.7(d)	Practicability of secondary containment	Section 4.2
112.7(e)	Inspections, tests and records	Section 4.3
112.7(f)	Personnel training, and discharge prevention procedures	Section 4.4
112.7(g)	Security	Section 4.4.4
112.8.b	Facility drainage	Section 4.6
112.8(c)(1-5)	Bulk Storage Containers / Secondary Containment	Section 4.7
112.8(c)(6)	Inspections	Section 4.3 Appendix C
112.8(c)(7)	Leakage control	Section 4.4 and 4.7
112.8(c)(8)	Overfill prevention system	Section 4.7.7
112.8(c)(9)	Effluent treatment facilities	Section 4.7.8
112.8(c)(10)	Visible discharges	Section 4.7.9
112.8(c)(11)	Mobile and portable containers	Section 4.7.10
112.8(d)	Transfer operations, pumping, and in-plant processes	Section 4.4.9 Section 4.8

1.5 Certification of the Applicability of the Substantial harm Criteria Checklist

Section 112.20(e) of the facility response plan regulation requires that all facilities regulated by 40 CFR Part 112 conduct an initial screening to determine whether they are required to develop a facility response plan. The criteria in this checklist can be found in 40 CFR 112.20(f)(1) and is included in **Appendix B**.

Section 2
Facility Information

2.1 Facility Owner, Address, and Telephone

The facility owner name, address, and telephone number is as follows:

The Board of Regents of the University System of Georgia
270 Washington Street, S.W.
Atlanta, GA 30334
(404) 657-7099

The facility operator name, address, and telephone number is as follows:

Clayton State University
2000 Clayton State Blvd.
Morrow, GA 30260
(678) 466-4050
(404) 961-3540

2.2 Facility Contacts

Facility contact(s) in case of a spill include the following:

Table 2-1: Facility Contacts

Contact Name	Title	Work Number	Home or Alternate Number
Bobby Hamil	Director of Public Safety	(678) 466-4050	(770) 961-3540
Darren Thomas	Director of Physical Plant	(678) 466-4240	(404) 520-3490
Cindy Knight	EHS	678-466-4244	
Priti Bhatia	Assistant Director Facilities Management	(678) 466-4203	
Harun Biswass	Assistant Vice President of Facilities Management	(678) 466-4240	(470)848-3146

Antonio Long as of 9/18

Lana Soroka as of 6/18

2.3 Facility Operations, Layout, and Site Plan

The physical layout of the facility is presented in **Figure 2-1** and **Figure 2-2**, a site vicinity map and a facility map, respectively, for the campus and the apartment complex, Clayton Station.

2.4 Facility Storage

CSU is a higher-education facility that contains low quantities of used oil and fuel, as well as equipment that includes an oil storage reservoir in which the oil is present solely to support the function of the device. The university also has elevators, diesel emergency back-up generators, and transformers.

All storage containers or equipment regulated under the SPCC rule are listed in **Table 2-2** and **Table 2-3**.

- The elevator reservoirs are in rooms that act as secondary containment.
- Transformers are stored on the ground surface or on the utility post (i.e. Clayton Station).
- The aboveground storage tanks (ASTs) are located at the facility maintenance area. The used oil AST is on a concrete floor and is under cover. The unleaded gasoline AST is located outside and on concrete. The diesel fuel AST is located under cover on a spill pallet under cover. The used oil and gasoline ASTs are both double walled.
- The two diesel emergency generators are located within secondary containment structures that can contain more than 110% each generators respective diesel fuel storage capacity.

The capacities of containers present at the university are listed in **Table 2-2** and **Table 2-3** and are also shown on the facility diagrams (Figure 2-2 and Figure 2-3). Only containers containing 55 gallons or more of oil are included, except for one transformer whose capacity was reported as an average. Because this transformer may contain more than 55 gallons of oil, it was included.

Oil-filled Equipment and Reservoirs less than 55 gallons

CSU also operates equipment containing less than 55 gallons of oil such as certain elevators and trash compactors. These are not listed in Table 2-2.

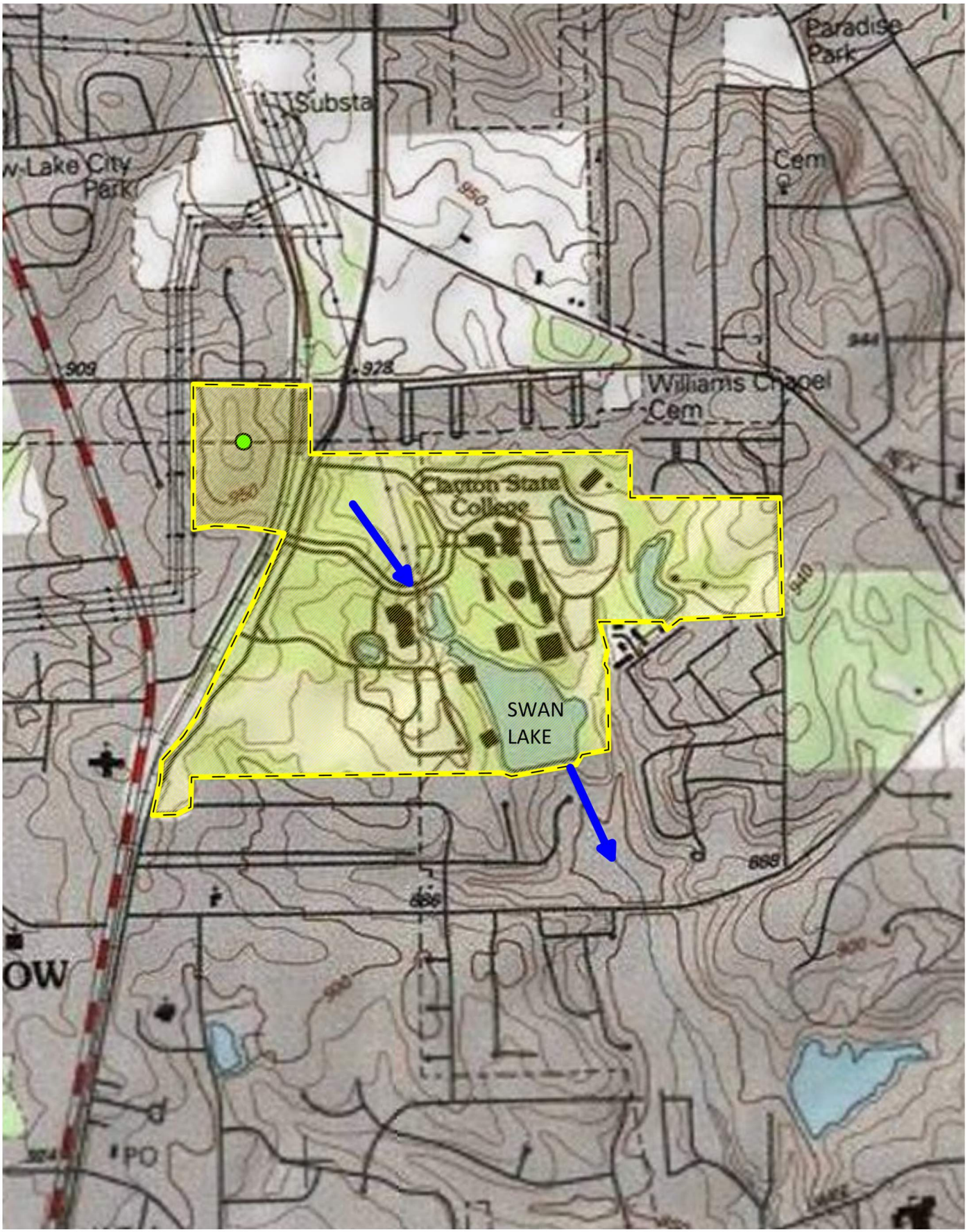
2.5 Drainage Pathway and Distance to Navigable Waters

The CSU Facility is located in Clayton County, Georgia. The storm water from this university flows to drainage ditches and storm water drains and then to the Swan Lake, located on the south of the subject site. **Figure 2-1** shows the topographic map and drainage pathway for the area.

Equipment that contains oil within the university buildings are not located near any floor drains that empty into the storm sewer, but some transformers located outside are. In the event of a spill, the oil will be cleaned up using absorbents and booms. If any oil enters the drain, plant personnel will notify the Clayton County Water Authority and other appropriate agencies (**Table 5-1**).

2.6 Spill History

Any spills are documented on a spill log (**Appendix D**), located in the EHS/Property Risk Coordinator's office. At the time of the creation of this SPCC Plan, the facility has not experienced any spill events within the past ten years that exceed 42 gallons.



Campus Boundary

Drainage Path

Figure 2-1: Site Vicinity
Clayton State University
Morrow, Georgia

CDM Smith

N

W E

S

Scale in Feet

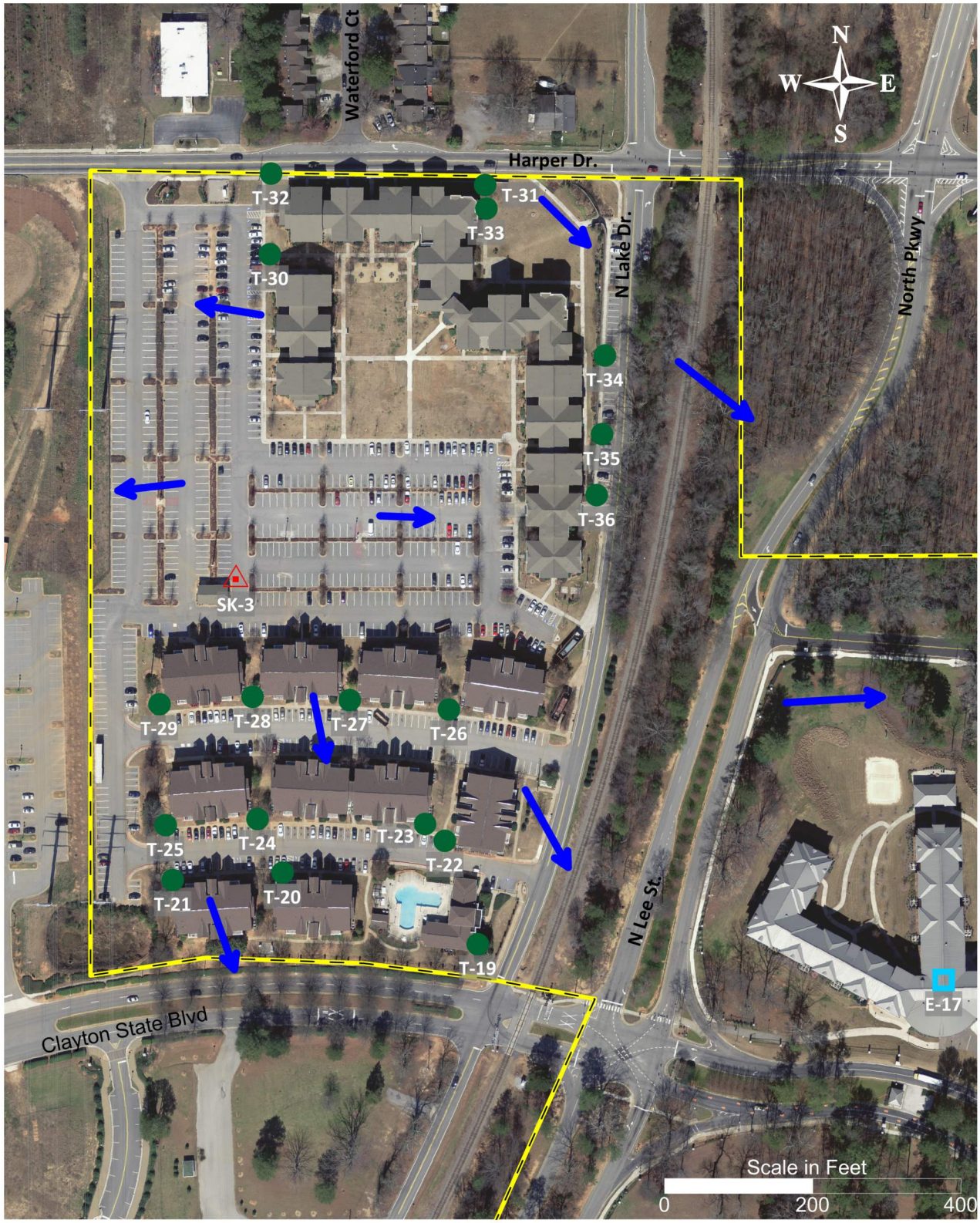
0 300 600

LEGEND

- Transformer
- Elevator
- Above Ground Storage Tank
- Spill Kit/Supplies
- Campus Boundary
- Flow Direction

Figure 2-2: Site Layout
Oil Containing Equipment Locations
Clayton State University
Morrow, Georgia

CDM Smith



LEGEND

Transformer

Campus Boundary

Spill Kit/Supplies

Flow Direction

Figure 2-3: Site Layout
Oil Containing Equipment Locations
Clayton Station Apartment Complex
Morrow, Georgia

CDM Smith

Table 2-2: Facility Oil Storage

Building Name/Container Location	Tank/Container Type	ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Facilities Management	Above Ground Storage Tank	AST-1	CSU	Used Oil	250	Double Walled Tank. Inside spill containment berm. Located under cover
Facilities Management	Above Ground Storage Tank	AST-2	CSU	Unleaded Gasoline	500	Double Walled Tank. Active spill containment measures stationed adjacent to tank. Discharge would pour onto concrete pad and flow toward the storm drain adjacent to the tank
Facilities Management	Above Ground Storage Tank	AST-3	CSU	Diesel Fuel	110	On spill pallett and located under cover
Harry S. Downs Center (School of Nursing)	Elevator (Freight)	E-1	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Harry S. Downs Center (School of Nursing)	Elevator (Passenger)	E-2	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Spivey Hall	Elevator (Passenger)	E-3	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Spivey Hall	Elevator (Freight)	E-4	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Spivey Hall	Elevator (Stage Lift)	E-5	CSU	Hydraulic Fluid	250	Building floor is Secondary Containment. Concrete floors and walls.
Music Education	Elevator (Passenger)	E-6	CSU	Hydraulic Fluid	105	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Student Activity Center	Elevator (Passenger)	E-7	CSU	Hydraulic Fluid	150	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
James M. Bakers University Center	Elevator (Passenger)	E-8	CSU	Hydraulic Fluid	300	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
James M. Bakers University Center	Elevator (Passenger)	E-9	CSU	Hydraulic Fluid	300	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
James M. Bakers University Center	Elevator (Freight)	E-10	CSU	Hydraulic Fluid	425	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Library	Elevator (Passenger)	E-11	CSU	Hydraulic Fluid	200	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Library	Elevator (Freight)	E-12	CSU	Hydraulic Fluid	200	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Clayton Hall	Elevator (Passenger)	E-13	CSU	Hydraulic Fluid	125	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Arts and Sciences	Elevator (Passenger)	E-14	CSU	Hydraulic Fluid	70	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Student Center	Elevator (Freight)	E-15	CSU	Hydraulic Fluid	80	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Student Center	Elevator (Passenger)	E-16	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Laker Hall	Elevator (Passenger)	E-17	CSU	Hydraulic Fluid	100	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Annex-LAB	Elevator (Passenger)	E-18	CSU	Hydraulic Fluid	80	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
CSU-East Administration Bldg.	Elevator (Passenger)	E-19	CSU	Hydraulic Fluid	80	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
CSU-East Multi-purpose Bldg.	Elevator (Passenger)	E-20	CSU	Hydraulic Fluid	80	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.

Table 2-2: Facility Oil Storage

Building Name/Container Location	Tank/Container Type	ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Science Building	Elevator (Freight)	E-21	CSU	Hydraulic Fluid	180	Inside Locked Room. Building floor is Secondary Containment. Concrete floors and walls.
Central Plant	Transformer 2	T-10	CSU	Mineral Oil	255	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Student Activity Center Loading Dock	Transformer	T-11	CSU	Mineral Oil	306	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Music Education Loading Dock	Transformer	T-12	CSU	Mineral Oil	355	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (stones) before going to storm drain or water body.
Student Center Loading Dock	Transformer	T-13	CSU	Mineral Oil	429	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
UC Loading Dock	Transformer	T-14	CSU	Mineral Oil	493	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Athletic and Fitness Building	Transformer	T-15	CSU	Mineral Oil	186	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Technology / Clayton Hall	Transformer	T-18	CSU	Mineral Oil	235	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Lakeviewview Discovery & Science Center	Transformer	T-37	CSU	Mineral Oil	476	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (stones) before going to storm drain or water body.
Facility Management (Loading Dock)	Transformer	T-2	CSU	Mineral Oil	183	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Adminstration / Faculty Hall	Transformer	T-3	CSU	Mineral Oil	183	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Tennis Courts/Soccer Field	Transformer	T-4	CSU	Mineral Oil	211	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
School of Business	Transformer	T-5	CSU	Mineral Oil	215	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to the santirary drain near the tank.
Arts and Sciences	Transformer	T-6	CSU	Mineral Oil	230	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Outside Library (Right of Entrance)	Transformer	T-7	CSU	Mineral Oil	254	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Lower Library (Near Carts)	Transformer	T-8	CSU	Mineral Oil	255	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (gravel) before going to storm drain or water body. In addition, there is an alarm to detect any accumulation of liquid in this area.

Table 2-2: Facility Oil Storage

Building Name/Container Location	Tank/Container Type	ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Central Plant	Transformer 1	T-9	CSU	Mineral Oil	255	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Continuing Education	Diesel Backup Gas generator Generator	G-1	CSU	Diesel Fuel	300	Concrete curb with capacity for 440 gallons. Spill would pool in containment and require pumping into appropriate containters for disposal.
Spivey Hall	Diesel Backup Gas generator Generator	G-2	CSU	Diesel Fuel	127	Steel curb with capacity for 400 gallons. Spill would pool in containment and require pumping into appropriate containters for disposal.

*Does not include equipment containing less than 55 gallons oil in reservoirs. Total = 9,033

Table 2-3: Georgia Power Owned Transformers

Building Name/Container Location	Tank/Container Type	Map/Container ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Laker Hall	Transformer	T-16	Ga Power	Mineral Oil	486	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
Main Transformer (near Athletic and Fitness Bldg)	Transformer	T-17	Ga Power	Mineral Oil	865	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-19	Ga Power	Mineral Oil	33	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-20	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-21	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-22	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-23	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-24	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
(Apartment Complex-Phase I)	Transformer	T-25	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase	Transformer	T-26	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-27	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-28	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-29	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-30	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-31	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-32	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.

Table 2-3: Georgia Power Owned Transformers

Building Name/Container Location	Tank/Container Type	Map/Container ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-33	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Active Only. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-34	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Active Only. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-35	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Active Only. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-36	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Active Only. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body.

*Does not include equipment containing less than 55 gallons oil in reservoirs. Total = 2,512

Section 3

Potential Spill Predictions, Volumes, Rates, and Control

3.1 Potential Discharge Volumes and Direction of Flow

Based on how and where oil and other petroleum products are used and stored at this facility, **Table 3-1** describes potential types of spill/release scenarios, estimated volume releases, the probable flow direction of the spill and the predicted spill rate. The probable flow directions are presented on **Figure 2-2** and **Figure 2-3**.

Table 3-1: Spill Prediction Analysis

Potential Failure / Location	Failure Type	Predicted Volume Released (gallons)	Predicted Spill Rate	Direction of Flow	Containment
Elevator Reservior Leak at any location.	Leak, rupture	up to 425 (capacity of largest reservior)	Gradual seepage to instantaneous spill	Within Elevator Closet (Storage Room with concrete floor and walls).	Concrete room.
Leak at Diesel Above Ground Storage Tank in Maintenance Area.	Leak, rupture	up to 110	Gradual seepage to instantaneous spill	To spill pallet and then to adjacent concrete floor inside before flowing outside to storm drain.	Spill Pallet - Holds up to 120 gallons.
Transformer Leak at any location.	Leak, rupture	up to 865 (capacity of largest transformer)	Gradual seepage to instantaneous spill	To concrete pad and then adjacent ground surface (grass) and then to stormwater drain or Lake.	Land-based spill response capability (spill kits)
Leak at Used Oil Above Ground Storage Tank in Maintenance Area.	Leak, Rupture, Spill during offloading	10 to 250	Gradual seepage to instantaneous spill	Adjacent ground surface (concrete) and then to stormwater drain.	Land-based spill response capability (spill kits)
Leak, spill, or overfill at Unleaded Gasoline Above Ground Storage Tank in Maintenance Area.	Leak, Rupture, Spill during offloading or filling of containers	10 to 500	Gradual seepage to instantaneous spill	Adjacent ground surface (concrete) and then to stormwater drain.	Land-based spill response capability (spill kits)
Leak, spill or overfill of diesel generator at the Continuing Education Bldg.	Leak, rupture	up to 300	Gradual seepage to instantaneous spill	To secondary containment (concrete curb) and then to adjacent ground surface (concrete) and then to stormwater drain	Passive concrete containment strutucture - holds up to 440 gallons
Leak, spill or overfill of diesel generator at Spivey Hall.	Leak, rupture	up to 127	Gradual seepage to instantaneous spill	To secondary containment (concrete curb) and then to adjacent ground surface (concrete) and then to stormwater drain	Passive steel containment strutucture - holds up to 400 gallons

Section 4

Discharge Prevention

4.1 Drainage Control

At CSU, spill kits (absorbent pigs, pads, clay/granular absorbent, etc.) are maintained at facility maintenance (within the main building and near the fuel AST) and at the maintenance building at Clayton Station (the apartment complex), as shown on **Figure 2-2** and **Figure 2-3**. Spill kit material is maintained in sufficient amounts to contain and control a spill of the normal quantity of oil stored in the individual area. In addition, containment is provided for the diesel fuel AST within the facility maintenance building and the two diesel generators on campus. There are no drainage controls for the site as a whole.

4.2 Practicability of Secondary Containment

CSU is applying the use of secondary containment, double-walled tanks, and the use of readily available spill equipment to prevent discharged oil from reaching navigable waters. This overall approach is practicable and efficient for this facility. The structures and equipment to help prevent a discharge of oil are described in Table 2-2, 2-3, and 3-1.

4.3 Inspections/Record Keeping

4.3.1 Weekly, Monthly, and Quarterly Inspections

Inspections are conducted weekly, monthly, and /or quarterly and are documented. Inspections are performed as follows.

- Weekly Inspections: ASTs and drums - A CSU maintenance employee inspects ASTs and drums at facility maintenance, and logs findings on an inspection sheet (Appendix C).
- Monthly Inspections: Elevators and Diesel Emergency Generators - A CSU employee inspects all elevators for deterioration, corrosion, or leaks.
- Quarterly Inspections: Transformers and Spill Kits/Spill Response Supplies - A CSU employee inspects all transformers (those owned by CSE as well as those owned by Georgia Power) for deterioration, corrosion, or leaks. Georgia Power has documented to CSU via letter that they will handle any oil spill originating from their transformers (Appendix E). In addition, spill kits are inspected for accurate and sufficient contents. Findings are documented on inspection forms found in Appendix C.

Any oil-filled operational equipment, waste oil, fuel, or hydraulic fluid containers, and piping problems are immediately reported to the Director of Facilities Management. Equipment oil spills (leaks) that cause a loss of oil from tank walls, piping or other components are repaired or replaced as soon as possible to prevent the potential for a major spill from the source. This is especially important for sources located outside or near drains or catch basins that discharge to the environment.

Inspection checklists are included in Appendix C. An inspection checklist sheet shall be signed and dated, and remain on file in facilities management for five years plus the current year. The EHS/Property Risk Coordinator is responsible for maintaining them with this SPCC Plan. Employees at the facility who have been trained and are familiar with the equipment shall be responsible for conducting these inspections.

4.3.2 Periodic Integrity Testing

CSU performs visual inspections from the outside of the containers for signs of deterioration and corrosion.

4.4 Personnel Training and Spill Prevention Procedures

4.4.1 Personnel Instruction

CSU provides SPCC spill training to oil-handling employees to ensure that they are properly instructed in the operation and maintenance of equipment to prevent oil discharges, discharge procedures protocols, general facility operations, the contents of the facility SPCC Plan, and applicable pollution control laws, rules, and regulations.

Facilities Management will conduct annual training which includes the following training topics:

- Introduction to pollution control laws;
- Rules and regulations pertaining to the use and storage of oil products;
- Inspection, operation and maintenance of spill equipment, and oil storage and dispensing equipment;
- Spill response and cleanup;
- Spill notification and record keeping; and
- Spill prevention practices.

Records of attendance at training and topics covered are maintained by Facilities Management. The annual SPCC training is documented and includes the instructor's name, course outline, date and duration of training, attendant's names and signatures, and a corrective action list of SPCC Plan areas in need of improvement that were discussed, if any. This information is filed and maintained for at least three years at Facilities Management. A Certificate of Training is presented to each CSU employee that has completed the training. Facilities Management forwards a copy of this certificate to the Human Resource Department for inclusion in the employee's file.

4.4.2 Designated Person Accountable for Spill Prevention

The EHS/Property Risk Coordinator is responsible for:

- Overseeing discharge prevention activities,
- Reporting on the progress of discharge prevention activities to facility management, and
- Conducting discharge prevention briefings at least once a year for oil-handling personnel to ensure adequate understanding of the facility SPCC Plan.

4.4.3 Spill Prevention Briefings

CSU holds annual training that discusses spill prevention scenarios.

4.4.4 Site Security

CSU has established security measures for the entire university which includes where oil is handled and/or stored. While the entire university cannot be fenced, the site is monitored and patrolled 24 hours per day by university security. Access to the maintenance area (oil storage area and fueling station) is controlled by both fencing and general security patrol during both operating and non-operating hours. Elevator closets and transformers are always kept locked. The diesel generators are in an area routinely monitored and patrolled.

4.4.5 Flow Valves Locked

There are no flow valves on any of the containers that would allow direct outward flow of the tanks content to the surface when in non-operating or non-standby status.

4.4.6 Starter Controls Locked

Starter controls on the gasoline and diesel ASTs are accessible only to authorized personnel and shall be manually operated by CSU personnel.

4.4.7 Pipeline Loading/Unloading Connections Securely Capped

There are no oil transfer pipelines at CSU.

4.4.8 Lighting Adequate to Detect Spills

CSU maintains sufficient lighting that is appropriate for a university, its location, and its security risks. The university is illuminated for students and their security but also prevents potential vandalism or other acts that may cause a discharge to occur during hours of darkness.

4.4.9 Truck Loading and Unloading Operations

CSU receives a tank truck for refilling the 500-gallon gasoline AST, a truck for filling the 110-gallon diesel AST, and a truck for removing used oil from the 250-gallon AST. CSU has an employee overseeing all truck unloading operations. The CSU employee shall ensure that, while on CSU property, the carrier follows all codes of federal regulations regarding the transportation of materials. CSU will ensure that the unloading truck is equipped with and properly uses handbrakes (parking brakes) or brake locking devices before unloading.

CSU will ensure that drivers immediately set parking brake and secure trailer with chock blocks. The CSU attendant must verify that the product on the truck is the correct product and grade to use in filling the tank. Prior to and after filling, the CSU attendant will oversee measuring and verify the level of tank contents. Adjustments must be made if the amount of product ordered exceeds the fill level of the tank. The CSU representative also reviews the tank monitor and the amount of fuel is entered into the inventory management system. The CSU attendant will verify that all fittings, hoses, and seals are in good condition (free of leaks, properly aligned, and correctly fitted) prior to unloading product. A CSU attendant must be present while the lines are being connected and disconnected.

When applicable, the CSU attendant will ensure that a proper ground connection is made first before any other connection is made. To make a proper ground connection you must: connect the ground cable, connect the proper unloading hoses(s), ensure that the valves are lined open correctly, ensure that the valves are lined closed correctly, vent the pressure off of the unloading hose(s) prior to disconnecting, return the unloading hose(s) to original position, return the ground cable to the original position, and complete the required paperwork before leaving the property. Attempting to cause a false ground by tampering with the ground system will cause the driver's unloading privileges to be immediately suspended. A true ground must be established from your truck to the grounding system.

Drivers and passengers will be directed to remain with the vehicle unless authorized to leave the vehicle by a designated CSU representative. A CSU authorized employee and transport personnel will be present when connecting and disconnecting. Note: the driver will be directed to remain outside the vehicle, but in the unloading areas during connecting, unloading, and disconnecting.

The CSU attendant will ensure that the driver provides means for collecting product lost in the disconnecting process. A bucket is provided by CSU for this purpose if the driver does not have one available. Any residual oil is collected and comingled with other waste oil for disposal. Disposal practices will be in accordance with local, state, and federal regulations.

4.4.10 Loading and Unloading Procedures Meet DOT Regulations

Truck unloading activities include the refilling of the gasoline AST approximately once per week, refilling of the diesel AST approximately once per month, and the removal of used oil (by vacuum truck) when necessary (approximately every two to three years). All incoming oil products are received and stored in approved containers less than 55 gallons. A licensed fluid recovery contractor handles disposal of used oil and grease on an as needed basis. All offloading activities are directly overseen by a trained CSU employee.

4.4.11 Secondary Containment For Vehicles

Loading and unloading activities performed at the facility include the unloading of gasoline and diesel fuel from tanker trucks with their own pumping systems, fueling of university vehicles at the fueling station, filling of smaller containers for distribution to university vehicles and landscaping equipment, and the removal of used oil. Secondary containment is not provided for the delivery of gasoline, vehicle fueling of fuel, or removal of used oil and grease. A storm drain is located directly down-gradient of the gasoline AST / fueling area. However, sorbent materials are maintained in sufficient quantities to contain a non-bulk container spill that occurs when loading or unloading trucks or vehicles and a storm drain cover is placed over the drain during fueling activities. In the event of a catastrophic release from an unprotected tanker failure during oil transfer, the trained facility personnel would implement the necessary control measures – the use of a storm drain cover and/or sorbent for diking, booms, pigs, socks, etc. – to divert and contain the spill until the appropriate emergency response contractor arrives onsite.

The CSU attendant will assist the driver in preventing product releases. Truck valve(s) should be used to shut off product in the event of a release, regardless of the cause. Under no circumstances should the driver attempt to start the truck and move the truck in an emergency situation without the expressed direction of CSU personnel. In the event of an uncontrolled release, all efforts

should be made to minimize and contain the release. Unloading should be shut down immediately and The Director of Facilities Management notified of the release.

4.4.12 Warning or Barrier System For Vehicles

A trained CSU employee is present to observe all loading/unloading operations in order to prevent vehicle departure before complete disconnect of transfer lines.

4.4.13 Vehicles Examined For Lowermost Drainage Outlets Before Leaving

A trained CSU employee visually inspects the vehicle prior to departing the facility.

4.5 Brittle Fracture Testing

Not Applicable. The facility has no field-erected aboveground storage containers and is therefore not subject to brittle fracture testing.

4.6 Facility Drainage

CSU uses many of the buildings and elevator storage closets as secondary containment. The areas are all locked, covered and no drains exist in these areas. In the event that oil or oil-impacted water collects on the building floor, the fluids will be cleaned up by properly trained personnel utilizing sorbent materials and placed in a drum for proper disposal.

4.7 Bulk Storage Tanks/Secondary Containment

4.7.1 Tank Compatibility with Its Contents

The 500-gallon gasoline AST and 250-gallon used oil AST are constructed of steel. The 110-gallon diesel tank is of aluminum constructions. All are compatible with their contents and storage conditions.

4.7.2 Diked Area Construction and Containment Volume for Storage Tanks

- A spill pallet is utilized for diesel fuel AST at facility maintenance. The containment volume of the spill pallet is 120 gallons.
- The gasoline and used oil ASTs are double-walled.
- The diesel generators are within secondary containment structures.
    - The diesel generator outside of the Continuing Education (CE) building has a concrete curb with a containment volume of 440 gallons.
    - The diesel generator outside of Spivey Hall (Spivey) is located within a premanufactured steel containment curb with a containment volume of 400 gallons.

All secondary containment systems are sufficiently impervious to contain an oil spill.

4.7.3 Diked Area, Inspection and Drainage of Rainwater

Any rainwater accumulation in the spill pallet for the diesel transfer tank (although unlikely since it is stored under cover) shall be manually pumped and poured back into the used oil AST. There are no drains in the spill pallet or the containment berm

Rainwater accumulation within the diesel generator containment area will be inspected for fuel contamination. The steel containment curb surrounding the generator for Spivey has a manually operated drain, while the concrete curb around the CE generator does not have a drain and must be manually pumped out. Non-contaminated rainwater will be manually pumped out of the CE generator containment area and allowed to flow to the stormwater drain. For the Spivey generator, non-contaminated rainwater will be drained by opening the manual valve and allowed to drain to a stormwater drain. CSU personnel will remain at the Spivey generator until draining is complete and will then **close the manual valve**. At both generators, impacted rainwater will be pumped out and disposed of properly with other waste products. A rainwater discharge form is included in **Appendix F**.

4.7.4 Corrosion Protection of Buried Metallic Storage Tanks

CSU has no buried metallic storage tanks.

4.7.5 Corrosion Protection of Partially Buried Metallic Tanks

There are no partially buried tanks at CSU facility.

4.7.6 Control of Leakage Through Internal Heating Coils

The CSU storage tanks are not equipped with internal heating coils.

4.7.7 Tank Installation Fail-safe Engineered

The 500-gallon fuel AST does have high liquid level alarms and a high liquid level pump cutoff device set to stop flow at a predetermined container content level. In addition, it has a low level alarm in order to detect a leak from the tank. A log is also maintained so that the amount leaving and entering the tank is tracked. Offloading of diesel fuel is overseen by a trained CSU employee, who ensures that the tank is not overfilled. The driver and CSU employee will be within a short visual distance of each other during the filling procedure to allow for direct communication.

The diesel generators are used in emergencies only, and fueling of these generators is seldom. When fuel is added to these generators, it is performed by a trained CSU employee, who adds the fuel by hand from a container and ensures that the tank is not overfilled.

4.7.8 Observation of Disposal Facilities for Effluent Discharge

No CSU effluents are discharged into navigable waters.

4.7.9 Visible Oil Leak Corrections from Tank Seams and Gaskets

The ASTs are inspected every week (and at fueling) to identify leaks. Elevators and diesel emergency generators are inspected monthly and transformers are inspected quarterly to identify leaks. Any leaks are referred to the Director of Facilities Management for immediate repair, or in the case of an elevator leak, to the elevator maintenance firm. If any leaks originate from Georgia Power owned transformers, Georgia Power will be contacted for cleanup. Any

spilled oil will be cleaned up by trained CSU personnel and disposed of in accordance with applicable regulations. Oil spill clean-up supplies are located throughout the university grounds.

4.7.10 Appropriate Position of Mobile or Portable Oil Storage Tanks

Any portable containers of oil are maintained and stored indoors and on a spill pallet.

4.8 Facility Transfer Operations

There is no buried piping onsite.

4.9 Spill Control Equipment

Spill control equipment on site includes rolls or blocks of absorbent mats/pads, absorbent booms/"pigs", oil-dry granular absorbent, empty drums, brushes and dust pans, gloves , and a storm drain cover **(Table 4-1).** Spill equipment is contained in two large spill kits located at the facilities maintenance building and the apartment complex maintenance building (Figures 2-2 and 2-3). Small spill kits are also located in each elevator closet. Any spill will be evaluated by authorized personnel who will determine the required response and notification of an outside emergency response contractor, if necessary.

4.10 Discharge Response and Countermeasure

Discharge prevention measures at the facility include training of personnel that handle and manage oil and other petroleum products in facility operations and maintenance of equipment to prevent and contain spills. This training shall include annual training sessions to ensure that facility personnel have an understanding of the SPCC Plan and its implementation.

Discharge prevention measures also include regular inspections of the tank, drums, secondary containment structures, piping, valving, alarm systems, drainage controls and measures. These prevention measures are discussed in this SPCC Plan.

4.11 Discharge and Drainage Controls

Secondary containment shall be provided for all 55-gallon drums or larger capacity containers located at the facility. Spilled material is cleaned up using absorbent material (booms and socks) or equipment.

Table 4-1: Spill Response Equipment List

Equipment	Quantity	Locations
Absorbant Pigs/Socks	10	Each Kit; See Locations of Spill Kits on Figures 2-2 and 2-3.
Small Broom	1	
Dust Pan	1	
Oil-Dry Absorbant	1 bag	
Trash Bags and Ties	12	
Absorbant Pads	1 Box	
Storm Drain Cover	1	
Gloves	1 Box	

Section 5

Discharge Response

5.1 Spill/Discharge Response and Countermeasures

Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor are provided below. Contacts for spill response contractors are listed in **Table 5-1**.

5.1.1 Discovery of Spill/Release

The person discovering a spill/release plays a critical role in determining the appropriate immediate actions to ensure for theirs' and other's safety and the protection of the environment. These immediate actions are primarily based on whether the spill/release is incidental or non-incidental. CSU employees are equipped with either cell phones or two-way radios in order to report a spill.

5.1.2 Minor Spill Response or Incidental Spill

A "Minor Spill Response" or "Incidental Spill" is defined as a spill of a small quantity that poses no significant harm to human health or the environment. These spills involve generally less than five gallons and can usually be cleaned up by CSU personnel. Other characteristics of a minor spill include the following: the spilled material is easily stopped or controlled at the time of the spill; the spill is localized the spilled material is not likely to reach surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen; there is little danger to human health; and there is little danger of fire or explosion.

In addition, employees are familiar with the hazards associated with the spilled material and the material can readily be absorbed, neutralized or otherwise controlled.

In summary:

- Incidental spills are to be stopped, contained and cleaned up at the source without endangering yourself or others. A list of Spill Response Equipment for the facility is presented in **Table 4-1**.
- Report all spills to Facilities Management. They will arrange for waste disposal.
- Under the direction of a trained CSU employee and the CSU Emergency Contacts, contain the spill with spill response materials and equipment.
- Place spill debris in properly labeled waste containers.
- Complete the Spill Event and Notification Form (Appendix D) and send to The Director of Facilities Management.
- No external reporting is necessary for an incidental spill.

5.1.3 Major Spill Response / Spill Emergency

A major spill or a spill emergency includes, but is not limited to, the following criteria:

- DOES reach the environment (i.e., enters a floor or storm drain, discharges to the ground surface, etc.) and /or causes a sheen;
- is a large spill and spreads beyond the immediate spill area (>25 gallons or oil or equal to or above the reportable quantity (RQ) and cannot be readily absorbed, neutralized or otherwise controlled – employees are not familiar with or are unaware of the health and safety hazards, and – an injury has occurred as a result of the spill/release.
- the spill requires special training and equipment to cleanup;
- the spilled material is dangerous to human health; and
- there is a danger of fire or explosion.

In the event of a spill emergency, the following guidelines apply.

- The person(s) discovering a spill/release that is non-incidental must immediately notify Public Safety and other applicable emergency contacts (Table 5-1).
- All workers shall immediately evacuate the spill site and move to a safe distance away from the spill.
- A senior on-site person or the CSU Emergency Contacts shall call for medical assistance if workers are injured (no worker shall engage in rescue operations unless they have been properly trained and equipped).
- A senior on-site person or the CSU Emergency Contacts shall immediately contact the appropriate agencies as listed in Table 5-1. Phone calls shall be documented on the Spill Event and Notification Form (Appendix D).
- The Director of Facilities Management will coordinate cleanup and seek assistance from a cleanup contractor as necessary.

If a senior on-site person is not available at the time of the spill, then the next highest CSU employee in command assumes responsibility. That person will assess the spill/release and notify the Director of Facilities Management with the following information:

1. Location of the spill;
2. Name of the material spilled;
3. The amount spilled and source of the spill;
4. Associated hazards;
5. Location and description of environmental receptors (e.g. storm drains, floor drains, etc.) if applicable; and
6. Description of any injuries.

5.2 Spill Reporting

A spill or discharge includes but is not limited to any spilling, leaking, pouring, emitting, emptying, or dumping oil in any quantity. All reportable spill events will be documented, which will facilitate the proper reporting of a discharge to applicable individuals and agencies. CSU personnel, in conjunction with the Director of Physical Plant, will determine if the spill meets reporting requirements described in this Plan.

5.2.1 Federal Reporting Requirements

The Director of Physical Plant or designee will immediately report any spill resulting in the discharge of oil into navigable waters to the National Response Center (NRC).

5.2.2 State Reporting Requirements

In addition to the federal reporting requirements, the Georgia Department of Natural Resources (GA DNR) requires that any spill in excess of the reportable quantity, or of an unknown quantity, is reported to them immediately upon release or discovery. In addition, one is required to report any spill hitting water of Georgia that causes a sheen or discoloration. The responsibility to report a spill falls upon the responsible party – or upon the discoverer of a spill. To report, contact the state emergency operations center. The number is listed in Table 5-1.

5.2.3 Spill Response Procedures

The Director of Physical Plant or designee will evaluate the situation to determine immediate actions required. He or she will determine if assistance from a spill response contractor (Table 5-1) is necessary to clean-up the spill. Upon the request of CSU these contractors will assist in the response, mitigation and clean-up of a spill/release. The phone number for spill response contractors are identified in Table 5-1.

1. If the spill/release has migrated beyond the CSU property, The Director of Physical Plant will request the assistance of the local fire department and a spill response contractor.
2. If there is an immediate threat to human life (e.g., a fire in progress or vapors overcoming personnel), The Director of Physical Plant will immediately notify the Morrow Fire Department and/or Police Department.
3. If a non-incidental spill/release meets specified criteria, The Director of Physical Plant will be responsible for necessary reporting to outside agencies.

5.2.4 Clean-Up of Spill Area

1. Surfaces that are contaminated by the spill/release shall be cleaned by the use of an appropriate cleaning substance. All materials used in the clean-up, including aqueous cleaning substances, must be minimized, contained and properly disposed.
2. All tools and equipment that have been used during a spill response or clean-up must be thoroughly decontaminated.

5.3 Waste Disposal

CSU's methods of disposal of recovered materials are that all spill clean-up material shall be recovered into appropriate containers, open-top 55-gallon drums; or if the size of the spill warrants, into a roll-off container. Appropriate PPE and clean-up procedures can be found in the material SDS. Care should be taken when cleaning up spills to minimize the generation of additional waste. Recovered materials will be disposed of in accordance with applicable EPA and EPD regulations and CSU procedures.

5.4 Discharge Notification

In the event of a minor spill, a shop supervisor notifies the CSU Emergency Contacts and completes a written Spill Event Record Form (Appendix D). This form details the time, material, and quantity of oil released. The form is filed and kept as long as the Board of Regents and CSU own and/or operate this university. If a major spill occurs at CSU, after making the appropriate phone calls (Table 5-1) and after the spill is contained, a Spill Event Record Form and a Spill Notification Form (Appendix D) is completed and submitted to the Director of Physical Plant. The Spill Notification Form includes a checklist to document the proper notification of state and federal agencies. The form is filed and kept as long as the Board of Regents and CSU own and/or operate this university. In addition to the notification procedures above, if a major spill occurs at CSU, the Director of Physical Plant completes and submits an Agency Notification Report Form (Appendix D), which provides written information to the EPA Regional Administrator as required by the SPCC Plan rules. A copy of this form is provided to the EPD. The submitted report will include the following information:

1. Name of the facility
2. Facility manager's name
3. Location of the facility
4. Maximum storage or handling capacity of the facility and normal daily throughput
5. Corrective action and countermeasures taken, including a description of equipment repairs and replacements
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary
7. The cause of discharge including a failure analysis of the system or subsystem in which the failure occurred
8. Additional preventative measures taken or contemplated to minimize the possibility of recurrence
9. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

The Administrator may require CSU to amend this SPCC Plan if he finds that it does not meet the requirements or that the amendment is necessary to prevent and contain discharges.

5.4.1 Spill Investigation

1. Determine the cause of the spill (equipment failure, carelessness, negligence, etc.). Collect statements from the personnel involved and any evidence that may be helpful (take photographs if appropriate).
2. Determine if current procedures are adequate to prevent a similar spill in the future, and if not, make necessary changes to procedures.
3. Evaluate the response of all parties involved with this spill. Determine if any improvements in response time, equipment used, etc., are necessary.
4. Document all findings and recommendations.
5. Maintain a written report at the facility with this SPCC Plan.

5.4.2 Written Reports

A written report is required to be sent to the Regional Administrator of the U.S.EPA and appropriate state agency(s) in charge of oil pollution control activities within 60 days of any spill event when:

1. A discharge of over 1,000 U.S. gallons of oil occurs in a single discharge as described in 40 CFR Part 112.1(b), or
2. It is the second discharge as described in 40 CFR Part 112.1(b) occurring within a twelve-month period of more than 42 U.S. gallons of oil.

5.4.3 Emergency Contact List

All emergency contacts including emergency contact names and telephone numbers for facility response personnel, division environmental personnel, appropriate agencies, and oil spill response contractors are listed in **Table 5-1**.

Table 5-1: Emergency Contacts

Name	Main Contact Number	Alternative Phone Number	Circumstances	When to Notify
Campus Police	(678) 466-4050		Fire or Injury. Contact Campus Police and they will direct Fire Department and/or Ambulance to your location.	As Needed.
Bobby Hamil, Director of Public Safety INITIAL CONTACT FOR SPILL	(678) 466-4050	(770) 961-3540	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
Morrow Police Department	911	(770) 961-4006	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	As Needed.
Hospital: Southern Regional Medical Ctr 11 Upper Riverdale Rd Riverdale, GA 30274	(770) 991-5355		Injury.	As Needed.
National Response Center c/o U.S. Coast Guard 2100 2nd Street, SW Washington, D.C. 20593-000	(800) 424-8802		Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
EPA Region IV (Hotline)	(800) 296-1996		Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Immediately (verbal)
EPA Region IV SPCC/FRP Coordinator U.S. EPA - Region IV 61 Forsyth St. Atlanta, GA 30365-3415	(404) 562-8768		Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days.
Georgia Department of Natural Resources Environmental Protection Division Emergency Operations Center 2 Martin Luther King Jr. Drive Suite 1252 Atlanta, Georgia 30334	(800) 241-4113	(404) 656-4863	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
Darren Thomas Director of Physical Plant 2000 Clayton State Blvd. Morrow, GA 30262 darrenthomas@clayton.edu	(678) 466-4249	(404) 520-3490	Any discharge.	Immediately (verbal)

Table 5-1: Emergency Contacts

Name	Main Contact Number	Alternative Phone Number	Circumstances	When to Notify
Lana Soroka EHS/Planning & Design Manager 2000 Clayton State Blvd. Morrow, GA 30262 ssoroka@clayton.edu	(678) 466-4244	(	Any discharge.	Immediately (verbal)
Priti Bhatia Assistant Director Facilities Management 2000 Clayton State Blvd. Morrow, GA 30262 pritibhatia@clayton.edu	(678) 466-4203		Any discharge.	Immediately (verbal)
Harun Biswas Assistant Vice President of Facilities Management 2000 Clayton State Blvd. Morrow, GA 30262	(678) 466-4240	(470)848-3146	Any discharge.	Immediately (verbal)
Used Oil Removal Contractor: Safety Kleen Morrow, GA (S. Atlanta) 7027 Commercial Drive Morrow, GA 30260	(770) 960-1275		Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As Needed.
Clayton County Water Authority Jim Poff - Water Reclaimation Department Manager	(770) 478-7496		Any discharge that enters a sanitary drain.	Immediately (verbal)

Appendix A

Plan Review and Evaluation

SPCC Review and Evaluation

The table below logs the review and evaluation of the SPCC Plan for Clayton State University and documents amendments and/or Certification that has been required. Insert all previous amendment documentation, and/or P.E. or Self-Certification.

Reviewer Signature	Reviewer Name	Date	Plan Amended?		If technical amendment, P.E. or Self-Certified?		Describe Amendments: (technical and/or administrative)
			Yes	No	Yes	No	
			Yes	No	Yes	No	
			Yes	No	Yes	No	
			Yes	No	Yes	No	
			Yes	No	Yes	No	
			Yes	No	Yes	No	
			Yes	No	Yes	No	

Appendix B

Certification of Applicability of the Substantial Harm Criteria Checklist

Facility Name: Clayton State University

Facility Address: 2000 Clayton State Blvd, Morrow, GA 30260

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes_____ No ____X____

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes_____ No ____X____

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula1) 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 Environments" (Section 10, Appendix E, 40 CFR 112 for availability) and the applicable Area Contingency Plan.
Yes_____ No ____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 (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula1) such that a discharge from the facility would shut down a public drinking water intake2?
Yes_____ No ____X____

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 ____X____

CERTIFICATION

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

Signature:_____

Name (please type or print)_____

Title _____

Date_____

Appendix C

Inspection Checklists

Weekly Inspection Form
ASTs and Drum
Month:

Date	CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - FUEL	500			
	AST-3	Facilities- DIESEL	110			
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - FUEL	500			
	AST-3	Facilities- DIESEL	110			
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - FUEL	500			
	AST-3	Facilities- DIESEL	110			

Monthly Inspection Form
Diesel Backup Generators

Month/Yr	CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.
	G-1	Continuing Ed.	300			
	G-2	Spivey	127			
	G-1	Continuing Ed.	300			
	G-2	Spivey	127			
	G-1	Continuing Ed.	300			
	G-2	Spivey	127			
	G-1	Continuing Ed.	300			
	G-2	Spivey	127			

Monthly Inspection Form
Elevators
Date:

CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Elevators						
E-1	Harry S. Downs Center (School of Nursing)	100				
E-2	Harry S. Downs Center (School of Nursing)	100				
E-3	Spivey Hall	100				
E-4	Spivey Hall	100				
E-5	Spivey Hall	250				
E-6	Music Education	105				
E-7	Student Activity Center	150				
E-8	James M. Bakers University Center	300				
E-9	James M. Bakers University Center	300				
E-10	James M. Bakers University Center	425				
E-11	Library	200				
E-12	Library	200				
E-13	Clayton Hall	125				
E-14	Arts and Sciences	70				
E-15	Edgewater Hall	80				
E-16	Edgewater Hall	100				
E-17	Laker Hall	100				
E-18	Annex-LAB	80				
E-19	CSU East - Arbor Hall Administration Bldg.	80				
E-20	CSU East - Arbor Hall Multi-purpose Bldg.	80				
E-21	Lakeview Discovery & Science Center	180				

Quarterly Inspection Form
Transformers
Date:

CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Transformers						
T-2	Facility Management (Loading Dock)	183				NA
T-3	Adminstration / Faculty Hall	183				NA
T-4	Tennis Courts/Soccer Field	211				NA
T-5	School of Business	215				NA
T-6	Arts and Sciences	230				NA
T-7	Outside Library (Right of Entrance)	254				NA
T-8	Lower Library (Near Carts)	255				NA
T-9	Central Plant	255				NA
T-10	Central Plant	255				NA
T-11	Student Activity Center Loading Dock	306				NA
T-12	Music Education Loading Dock	355				NA
T-13	Student Center Loading Dock	429				NA
T-14	UC Loading Dock	493				NA
T-15	Athletic and Fitness Building	186				NA
T-16	Laker Hall	486				NA
T-17	Main Transformer (near Athletic and Fitness Bldg)	865				NA
T-18	Technology / Clayton Hall	235				NA
T-37	Lakeview Discovery & Science Center	476				NA

Quarterly Inspection Form
Transformers at Apartment Complex (Owned by GA Power)
Date:

CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Transformers						
T-19	5809 Northlake Dr. (Apartment Complex-Phase I)	33				NA
T-20	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-21	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-22	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-23	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-24	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-25	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-26	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-27	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-28	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-29	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-30	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-31	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-32	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-33	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-34 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-35 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-36 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA

Appendix D

Spill Response and Reporting Forms

Clayton State University
Spill Event and Notification Form for Incidental Releases

Name of Employee or Driver Responsible for Release: _____

Phone:_____

Truck # (if applicable): _____

Name of Company (if not CSU):_____

****

Date of Release:_____ Time of Release:_____

Location of Release: _____

Material/Substance Released:_____ Volume of Release (gallons):_____

Cause/Nature of Release: _____

Did release enter a storm drain or reach a water body? □ Yes □ No

Was release cleaned up within 24 hours? □ Yes □ No

Was release reported to GA DNR? □ Yes □ No

If yes, please provide name of GA DNR staff contacted _____

Was release reported to National Response Center (NRC)? □ Yes □ No

If yes, please provide incident response number _____

Petroleum-Only Release/Spill Reporting Guideline

The following Releases/Spills MUST BE IMMEDIATELY REPORTED to GA DNR at (404) 656-4863 or (800) 241-4113:

(1) Release/spill that equals or exceeds the reportable quantity or an unknown volume.
(2) Releases/spill of any volume that comes into contact with the ground (ex., grass, soil, dirt).
(3) Release/spill of any volume that reaches a water body or causes a sheen on a water body.

The following Releases/Spills MUST BE IMMEDIATELY REPORTED to GA DNR at (404) 656-4863 AND the National Response Center (NRC) at 1-800-424-8802:

(1) Release/spill of any volume that reaches a water body or causes a sheen on a water body.

Contact CSU Director of Facilities Management at (678) 466-4240 for further assistance.

_____ _____
Signature Date

Appendix D - Spill Log

Date and Time	Location	Type and Source of Spill	Volume of Spill (gallons)	Did spill reach stormdrain or water body? Y or N?	Cause of Spill	Cleaned up within 24 hours? Y or N?	Reported to GADNR? Y or N?	Reported to NRC? Y or N?

Appendix E

Georgia Power Transformer Letter

June 7, 2011

GEORGIA POWER
A SOUTHERN COMPANY

Darren Thomas
Assistant Director – Facilities Management
Clayton State University
Morrow, GA

Dear Mr. Thomas:

This letter is in response to your inquiry regarding the Georgia Power transformers located at the following addresses:

5809 Northlake Drive
Morrow, GA 30260
and
5751 Northlake Drive
Morrow, GA 30260

The transformers currently at this location are untested mineral oil filled units. If you desire additional information or testing for any PCB concentration, Georgia Power Company will provide such information and testing for a fee to cover expenses of such test. Below are the average gallons of oil for each size transformer on your site. Actual volume depends on specific type design and manufacturer.

5809 Northlake Drive:			
50 kVa (padmount)	-	avg. 33 gallons	(1 on site)
100 kVa (padmount)	-	avg. 56 gallons	(10 on site)
5751 Northlake Drive:			
100 kVa (padmount)	-	avg. 56 gallons	(2 on site)
167 kVa (padmount)	-	avg. 100 gallons	(2 on site)
100 kVa (overhead)	-	avg. 56 gallons	(1 on site)
167 kVa (overhead)	-	avg. 100 gallons	(2 on site)

overhead

Should any dielectric fluid spill occur, it would be handled by Georgia Power Company as per CFR 761.125 and the State of Georgia Oil and Hazardous Substance Release Act of 1991.

Should you have any questions or need additional information, please call me at (404)608-5560.

Sincerely,

Brad McBay
Key Account Manager

Appendix F

Rainwater Discharge Form

Appendix F - Rainwater Discharge Form

Date and Time	Location	Prescence Of Oil?	Approximate Volume of Rainwater Discharged (gallons)	Drain Valve Closed (Spivey Hall Generator)?	Signature

s