

# Oil Spill Prevention Control and Countermeasure (SPCC) Plan

## Bryant University

1150 Douglas Pike  
Smithfield, Rhode Island  
02917-1284



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## BRYANT UNIVERSITY

### OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

(40 CFR Part 112)

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## 1.0 INTRODUCTION AND PLAN CERTIFICATION

### 1.1 Introduction

As required by the Clean Water Act, the United States Environmental Protection Agency (US EPA) established Oil Pollution Prevention Regulations, which are codified in 40 Code of Federal Regulations (CFR) Part 112, Bryant University has developed this Oil Spill Prevention Control and Countermeasures (SPCC) Plan. These regulations establish procedures, methods, equipment, and other requirements to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States (US) or adjoining shorelines.

These regulations apply to owners/operators of facilities engaged in storing, processing, transferring, distributing, using, or consuming oil and oil products, including fuel oils, and other activities, which due to their location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon navigable waters of the US.

Facilities are subject to the federal Oil Pollution Prevention regulations if:

1. The underground storage capacity of the facility is 42,000 gallons of oil or greater; or
2. The aggregate aboveground storage capacity of the facility is 1,320 gallons or greater of oil.

Bryant University (Bryant) is subject to these regulations because the total aboveground storage quantity of oil exceeds 1,320 gallons.

Bryant University is a privately owned University located the State of Rhode Island at the *1150 Douglas Pike, Smithfield, RI 02917*.

Bryant University stores approximately 21,728 gallons of oil in containers and aboveground storage tanks (ASTs) in various buildings and locations throughout the campus. A ten thousand (10,000) gallon underground storage tank (UST) was removed from the campus in July of 2018. Since the University's aboveground volume exceeds the regulatory threshold, and since there is potential, although limited, for an oil spill to reach waters of the United States, an Oil Spill Prevention Control and Countermeasure (SPCC) Plan has been prepared and implemented. This Plan is also designed to meet the requirements of 250-RICR-140-25-2.14 for Spill Prevention and Emergency Plans in the State of Rhode Island. The plan is maintained in the Facilities Management office.



## 1.2 Professional Engineer's Certification (§112.3(d))

Original Plan Date: December, 2002

Date of PE Certification: June 30<sup>th</sup>, 2022

Date of Plan Review: June 2022

### Certification

I, Robert DeRosier, attest that I have reviewed the Bryant University Oil SPCC Plan and certify that:

- ◆ I am familiar with the requirements of the federal Oil Pollution Prevention regulations in 40 CFR Part 112;
- ◆ I (or my agent has) have visited and examined the campus included in this plan;
- ◆ The plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of the SPCC rule;
- ◆ Procedures for inspections and testing have been established; and,
- ◆ The plan is adequate for the facility.

**Professional Engineer:** Robert DeRosier

**Signature:** 

**Registration Number:** 49595

**State:** Massachusetts

**Date:** 6/30/2022

**Stamp:** 



## 1.3 Plan Review and Amendments (§112.4, 112.5(a)(b)(c))

### 1.3.1 Oil SPCC Plan Amendments Required by the U.S. EPA

In accordance with 40 CFR Part 112.4, the Regional Administrator (RA) of the US EPA may require the amendment of this Oil SPCC Plan if:

1. The facility has a discharge exceeding one thousand (1,000) gallons of oil in a single discharge, or
2. If more than forty-two (42) gallons of oil are discharged in each of two discharges occurring within any 12-month period.

If either of these two events occurs, Bryant University must submit information specified in the regulation to the RA within 60 days.

### 1.3.2 Oil SPCC Plan Amendments Required in the Event of a Material Change

In accordance with 40 CFR Part 112.5(a) this Oil SPCC Plan will be amended “when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge into or upon navigable waters of the US”.

- Changes that may require amendment of 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.

The amendment(s) to the plan will be prepared within six months and implemented as soon as possible, but not later than six months following the plan’s amendment(s).



### 1.3.3 Oil SPCC Plan Review & Evaluation

In accordance with 40 CFR 112.5(b), a review and evaluation of this Oil SPCC Plan will be conducted at least once every five years from the date of the last review. Bryant University will amend the Oil SPCC Plan within six months of the review to include more effective prevention and control technology if:

1. Such technology has been field-proven at the time of the review; and
2. Such technology will significantly reduce the likelihood of a spill event from the University.

The amendment(s) will be implemented as soon as possible, but no later than six months following the amendment(s) of the plan. The review and evaluation of the Oil SPCC Plan originally prepared in December, 2002 will be documented and a statement signed as to whether the Plan will or will not be amended, as follows:

*“I have completed a review and evaluation of the Oil SPCC Plan for Bryant University on the date(s) below, and will (will not) amend the Plan as a result”.*

Review Dates	Amendment	Signature or Comment
December, 2002	Plan Developed	Developed with PE
July, 2008	Updated tank inventory and SPCC regulation changes in 40 CFR 112	Revision with PE
October, 2012	Updated 20,000 gallon UST removal at Hall 15	Revision with PE
March, 2014	Update tank inventory	Revision with PE
June, 2016	Update tank inventory	Revision with PE
August, 2021	Updated plan, inspection form, and tank inventory	
June 2022	Plan Update	Revision with PE

All technical amendments will be certified by a registered Professional Engineer.



## 1.4 Conformance with Regulatory Requirements (§112.7(a)(2))

Bryant University has developed this Oil SPCC Plan in accordance with the requirements of 40 CFR Part 112 and Rhode Island Department of Environmental Management (RIDEM) Oil Pollution Control Regulations (250-RICR-140-25-2.14). As allowed by the federal regulation (112.7(a)(2)), alternative equivalent environmental protection provisions have been implemented where deviation from technical elements of the regulation have been necessary. The reason for each deviation and a description of the environmentally equivalent methods implemented are included within this plan.

## 1.5 Management Approval (§112.7)

Bryant University is committed to the prevention of discharges of oil to navigable waters and the environment and maintains the industry standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasures (SPCC) Plan.

Authorized Facility Representative: \_\_\_\_\_

Name	Signature
_____	_____
Title	Date





## 2.0 GENERAL SITE INFORMATION (§112.7(a)(3))

### 2.1 Facility Description

Bryant University is a higher education facility located in Smithfield, Rhode Island. The roughly 428-acre campus is comprised of academic buildings, residence halls, athletic structures and complexes, administrative properties, and various facilities management buildings. The buildings have various uses, including classrooms, laboratories, living accommodations, dining halls, offices, and grounds and maintenance. **Appendix A** includes a facility site plan showing locations of oil storage containers with capacities equal to or greater than 55 gallons and the types of oil stored at Bryant University. The locations noted in **Appendix A** are also referenced in **Appendix B** which lists all oil storage locations, type, size, and spill safeguards.

### 2.2 Evaluation of Potential Discharge

The nearest surface water to the campus is Stillwater Reservoir (also referred to as Stump Pond) to southwest of the campus. This waterway flows to the Woonasquatucket River. Floor drains and sewer systems within Bryant University buildings discharge to the Smithfield Sewer Authority which discharges to the Woonasquatucket River. Storm drains outside the buildings discharge to adjacent wetlands. Storm drains within the parking lots discharge to the unnamed campus pond located between the Fisher Student Center and the Unistrukture.

### 2.3 Spill History (§112.4(a))

There have been no federally reportable releases of oil to the environment during the past 5 years.



## 3.0 SPCC PLAN OVERVIEW (§112.7(a)(3))

### 3.1 Facility Information

**Type of Campus:** Undergraduate and Graduate University

**Location of Campus:** 1150 Douglas Pike, Smithfield, RI 02917

**Name and address of owner or operator:**

Bryant University  
1150 Douglas Pike  
Smithfield, RI 02917

**Designated persons accountable for oil spill prevention at the facility:**

Name	Title	Office Phone Number	24 Hour Number
Andy DeMelia	Assistant Vice President of Facilities Management	(401) 232-6082	(508) 728-1820
Robert Dunning	Assistant Director of Facilities	(401) 232-6912	(401) 209-0198

### 3.2 Oil Storage

Oil storage facilities are in or adjacent to various University buildings. The site plans presented in **Appendix A** identify the locations of these facilities on the Bryant University campus. The stored oil and oil products include the following:

- Diesel fuel for emergency generators, diesel vehicles, and small pieces of equipment;
- Gasoline (87 Octane) for fueling vehicles;
- Hydraulic fluid for elevators;
- Non-PCB transformer oils;
- Waste and stock motor oil(s); and
- Kitchen oils/grease



## Types of Oils Stored and Storage Volumes

The table below identifies the types of oils and oil products located at Bryant University and their total volumes. Aboveground storage totals include the following oil types and sizes of tanks and containers with a capacity of 55 gallons or greater.

Product	Aboveground Storage (gallons)	Underground Storage (gallons)
Diesel	6,888	0
Hydraulic Oil	1,290	0
Waste Cooking Oil	475	0
Motor Oil	110	0
Used Oil	55	0
Gasoline (87 Octane)	3000	0
Non-PCB Transformer Oil	9,910	0
<b>Total</b>	<b>21,728</b>	<b>0</b>

Oil is stored at a variety of locations onsite. Oil storage locations, tank/container sizes, and the predicted flow rate and direction of any releases are presented in **Appendix B**. Procedures and equipment are fully operational; there is no out-of-service regulated equipment at Bryant University.

The total volume stored at the campus is below the threshold for a Facility Response Plan as documented in the Applicability of Substantial Harm Criteria (see **Section 13**).



## 3.3 Bryant University Policy on Oil Storage, Spill Prevention, and Spill Containment (§112.7(a)(3)(i-v))

Bryant University has instituted policies for proper oil storage, mitigation of the impact of any spills, and spill response. To achieve Bryant University's primary goal to prevent the occurrence of spills at the campus, specific procedures have been developed and implemented by the Facilities Management and/or their designees. Bryant University supplements this spill prevention initiative with a philosophy that should a spill event occur, the primary means to stop a release is to contain the material within the immediate area of the occurrence. For this reason, Bryant University's oil management system has also established several spill containment procedures for implementation in the event a spill should occur. The specific policies and procedures described in this plan are designed to provide spill prevention and containment at Bryant University.

### 3.3.1 Container and Drum Storage

The strategy for preventing releases from the Bryant University campus is to handle containers and drums properly, and, where needed, to contain a spill in the general area where the oil is being stored at the University. The following policies have been instituted:

- Drums of oil are properly labeled and stored upright on a spill pallet.
- Containers of oil are to be properly handled and transported by trained personnel.

Spill equipment (absorbent material, spill containment equipment) is maintained at or near oil loading/unloading storage areas throughout the campus.

Spill prevention measures taken by Bryant University are selected based on site-specific conditions, taking into consideration the practical application of a physical means of containment or engineered structure (e.g., berms, dikes, etc.) and the relative potential for spills or releases. Secondary containment is provided for bulk storage containers. Details of secondary containment inspection and spill prevention equipment and materials are included in **Appendix B**.



### 3.3.2 Aboveground Storage Tanks and Containers

There are seventy aboveground oil storage tanks and containers (including ASTs, drums, transformers and elevators) throughout the Bryant University campus. A list of these tanks and containers, and their contents and locations is included in Appendix B of this plan.

The general strategy for preventing releases is to contain a spill of oil in the general area until such time as the material can be removed by an outside contractor. The following procedures have been established:

- In outdoor areas with existing storage tanks near storm drains, or sensitive receptors, the drains are temporarily covered during refilling operations.
- Containment measures, such as the placement of curbs, berms, or spill pillows at doors or other exits, are used to contain spills within the rooms in which they occur.
- Facilities Management or their designee inspects all tanks and oil containing equipment on a monthly basis and documents these inspections. The Assistant Director of Facilities, or their designee, reviews all inspection logs. (See **Appendix D**).

### 3.3.3 Underground Storage Tank

Bryant has removed has one UST containing 10,000 gallons of Number (No.) 2 oil in July of 2018. It was located south of the Unistructure building. The removal of this tank completely removes the chance of an uncontrolled leak.

### 3.3.4 Hydraulic Oil Equipment

There are nine (9) hydraulic oil-containing elevators located at the University. The elevators are operated and maintained by an outside contractor. Each elevator is inspected on a monthly basis by the Facilities Management staff or their designee. An inspection checklist for all oil storage locations covered by this Plan is available in **Appendix D**. Spill kits are nearby in the event of a spill.

### 3.3.5 Oil Containing Electrical Transformers

Bryant University currently owns and operates forty-one oil-filled electrical transformers at the campus. The university utilizes external contractor personnel for routine maintenance operations of the electrical transformer equipment at the campus. Should a contractor detect a leak, they



will notify Bryant University staff of such an event and utilize spill equipment to prevent a release to navigable waters.

A description of these university-owned units is included in **Appendix B** of this plan. As a best management practice, the oil-filled transformers on Bryant University's property are included in a program of regular inspections described in **Section 9.0** of this plan. An inspection checklist for all oil storage locations covered by this Plan is available in **Appendix D**.

### **3.3.6 Waste Cooking Oil**

Bryant University stores waste cooking oil in three separate locations. There is one 200-gallon single-walled tank located at the Unistructure loading dock and one 200-gallon single-walled tank located at the Fisher Center loading dock and one 75-gallon tank located at Hall 17. Spill kits are nearby in the event of a spill.

### **3.3.7 Disposal of Spill Clean-Up and Recovered Materials**

Materials collected during spill response and clean-up activities will be managed and disposed of in accordance with applicable state and federal waste regulations.



## 4.0 POTENTIAL SPILLS - PREDICTION AND CONTROL (§ 112.7(b) & (c))

Per subsection 112.7(b) of the federal regulations, this plan identifies locations where experience indicates that a reasonable potential for equipment failure exists. The regulation requires that the plan include a prediction of the flow direction, rate of flow, and total quantity of oil that could be discharged from the facility as a result of such a failure. Subsection 112.7(c) further states that containment and/or diversionary structures or equipment to prevent discharged oil from reaching a navigable watercourse should be provided.

**Appendix B** lists the locations where oil is stored and where spill events could occur, indicates stored oil volumes, estimates potential flow rates and direction, and lists the containment and/or diversionary structures or equipment that are used to prevent discharged oil from reaching a surface water. The information is listed based on the tank's/container's location.



## 5.0 FACILITY DRAINAGE (§ 112.8(b))

### 5.1 Drainage Systems

Drainage from the oil storage areas at the university is differentiated by indoor and outdoor drainage systems.

#### Indoor Drainage Systems

When practicable, Bryant University stores and handles oil within contained areas or with secondary containment. Oil is stored in various buildings at the Bryant University campus. At this time, indoor oil storage tanks and containers equal to or exceeding 55 gallons have secondary containment. Physical containment of and response procedures to potential oil releases will greatly reduce, if not completely prevent, oil from reaching the outside environment. There are no floor drains near any oil tanks or containers outlined within this plan.

#### Outdoor Drainage Systems

The remaining Bryant University tanks are not adjacent to storm drains. It is the policy of Bryant University to cover adjacent storm drains prior to oil deliveries to the above-mentioned locations. Additional oil delivery procedures are outlined in **Section 8.2**.

During periods of wet weather flow, there is a possibility that oil spills to storm drains could reach a local surface water body or navigable waterway and be considered a reportable spill incident by federal definition.

ASTs are located on concrete or asphalt surfaces or within buildings with concrete floors. With the exception of the forty oil-filled electrical transformers and two 200-gallon waste kitchen oil ASTs, all other containers that have the total capacity equal to or greater than 55 gallons, are double-walled or have secondary containment.





## 6.0 BULK STORAGE TANKS/CONTAINERS (§ 112.8(c))

“Bulk storage container” is defined in the regulations as *any container used to store oil except oil filled electrical, operating, or manufacturing equipment*. For purposes of this plan, the terms “tank” and “container” are used interchangeably. Oil storage tank inventories for Bryant University are provided in **Appendix B**. There are ASTs, and containers (including hydraulic elevator tanks) at the campus. None of the tanks are equipped with internal heating coils.

### 6.1 Tank Materials and Construction (§ 112.8(c)(1))

Tanks are constructed of steel and/or fiberglass that are compatible with the material stored within them and with other conditions of storage.

### 6.2 Secondary Containment (§ 112.8(c)(2))

All of the ASTs, with the exception of the electrical transformers and waste kitchen oil ASTs, are double-walled or located within a bermed room which provide sufficient secondary containment. The types of secondary containment for the ASTs are listed in **Appendix B**.

Bryant University’s oil delivery contractor performs oil deliveries in compliance with U.S. Department of Transportation (DOT) regulations. The oil delivery contractor maintains absorbent pads and spill containment materials on each oil delivery truck. The delivery contractor is also responsible for providing oil absorbent booms or socks under each loading pipe to prevent spillage or leakage of oil into the environment.

### 6.3 Buried or Partially Buried Metallic Tanks (§112.8(c)(4)&(5))

There are no partially buried metallic storage tanks at Bryant University.



## 6.4 Aboveground Storage Tank Integrity Testing Schedule (§112.8(c)(6))

Federal oil pollution prevention regulations set forth in 40 CFR Part 112 require regular visual inspection as well as integrity testing of oil ASTs/containers on a regular schedule. Each of the ASTs at Bryant University has been assessed to determine the most appropriate integrity testing methods as outlined below.

In order to comply with this requirement Bryant University has implemented measures equivalent to the requirements of 112.8(c)(6) by adhering to the provisions of the Steel Tank Institution Standard SP001, Inspection of Aboveground Storage Tanks. This standard is hereafter referred to as STI Standard SP001. The standard establishes methods and procedures for the inspection of storage tanks based on the risk of release to the environment with consideration to spill control methods and release detection engineering of the tanks.

Bryant currently stores oil in aboveground containers ranging in size from 55 gallons to 3,000 gallons. Tanks less than 5,000 gallons shell capacity do not fall under “Category 3” tank specifications which are specific to ASTs without spill control and without continuous release detection monitoring, therefore non-destructive shell testing is not applicable in accordance with STI Standard SP001. This is discussed in greater detail in the following paragraphs.

### **55-Gallon Drums**

In accordance with Table 5.5 “Table of Inspection Schedules” of the STI Standard SP001, “Portable Containers” are only subject to monthly visual inspections whereas no formal shell integrity testing is required. Furthermore, in accordance with clarification provided by U.S. EPA Region I, DOT-approved 55-gallon drums in good condition are not subject to integrity testing as they are already in conformance with required industry standards.

Accordingly, Bryant University has adopted the environmentally equivalent practice of using only UN Rated [DOT approved] shipping containers for the storage of oil in quantities of ≤ 55 gallons. This standard practice is addressed within the annual training provided to all oil handling personnel.



# Bryant University

## **Small Storage Tanks (100 to 5,000-Gallon Capacity)**

In accordance with STI Standard SP001, the small storage tanks at Bryant University were evaluated for their risk of release to the environment based on the following conditions:

- Presence of a Continuous Release Detection Method (CRDM);
- Presence of spill control equipment;
- Tank size; and
- Tank type.

As a result, integrity testing is not required as long as inspections are conducted.

## **6.5 Container Installations – Good Engineering Practices (§112.8(c)(8))**

The ASTs are equipped with a type of Overfill Protection Device (OPD) such as liquid level indicators or vent whistles, or the liquid level can be observed while filling the container (e.g., drums, elevator reservoirs, etc.); storm drains are protected when tanks are being filled. Specifically:

- ASTs have vent whistles and/or are observed during filling.
- Where OPDs are not practical (e.g., 55-gallon drums), observation of container filling in lieu of an OPD, is an acceptable means of providing alternative measures for equivalent environmental protection in accordance with 112.8(c)(8).

## **6.6 Facility Wastewater Discharges (§ 112.8(c)(9))**

Bryant University sanitary wastewater is discharged to the Smithfield Sewer Authority Wastewater Treatment Plant located in Smithfield, RI which discharges to the Woonasquatucket River. By implementing containment procedures, by providing secondary containment in indoor oil storage areas, and by maintaining a supply of absorbent materials in such areas, Bryant University minimizes the potential for oil spills occurring in campus buildings to reach the sewer system, or other waters of the U.S.



## 6.7 Visible Oil Leaks and Mobile Oil Storage Tanks (§112.8(c)(10)&(11))

Upon discovery, oil leaks that could result in a loss of oil from tank seams, gaskets, rivets and bolts, are promptly corrected by Facilities Management or designee.

Leaks are corrected by Facilities Management personnel on an as-needed basis and both written and verbal reports are submitted to the Assistant Director of Facilities. The individual, who detects the leak, initiates repairs or calls for a work order. Spill equipment is nearby in the event of a release.

In the event that portable or temporary oil storage containers are used by Bryant University, either active or passive means of secondary containment would be provided. In accordance with the regulation, secondary containment would be required to provide 100% containment of the largest container volume plus sufficient freeboard for precipitation (outdoor storage only).

## 7.0 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES (§112.8(d))

The principal transfer operations taking place at Bryant University involves the transfer of oil from delivery trucks to ASTs and from the containers to its point of use. In addition, Bryant University transfers products from containers on an as-needed basis. Oil is pumped from the oil storage tanks by various pumping and pipeline systems to its point of final use. No aboveground oil pipes are located where vehicles could cause damage, therefore, no warning is provided to vehicle operators to avoid aboveground oil lines.

### 7.1 Buried Piping (§ 112.8(d)(1))

The university has aboveground piping systems. All accessible aboveground systems are visually inspected on a monthly basis as part of the tank inspection procedures (see **Appendix D**). Buried piping systems are visually inspected whenever they are exposed. All buried piping was removed with the UST in 2018.



## 7.2 Out-of-Service Pipelines (§112.8(d)(2) & 112.7(g)(4))

Bryant University currently does not have any out-of-service pipes. However, when pipelines are not in service or are in standby mode for an extended period of time, the connection at the transfer point is capped and marked to its origin.

## 7.3 Pipe Supports and Aboveground Pipelines and Valves (§112.8(d)(3) and (4))

Oil transfer pipeline supports have been designed and constructed to minimize abrasion and corrosion and allow for expansion and contraction. The Assistant Director of Facilities, or their designee, visually examines the aboveground pipelines, valves, and pipe supports on a monthly basis. These inspections are documented, and records kept on file for a minimum of ten (10) years per RIDEM regulations. The Assistant Director of Facilities, or their designee, reviews the inspection reports. Inspection logs can be found in **Appendix D** of this Plan.



## 8.0 TANK TRUCK UNLOADING (§112.8(d) and 112.7(a)(3))

Tank truck unloading at Bryant University consists primarily of bulk deliveries of oil to their respective aboveground storage tanks. Contractors are required to follow Bryant University's established spill prevention guidelines. No loading racks are present at Bryant University.

### 8.1 Department of Transportation Regulations

An independent oil delivery contractor, under contract with Bryant University, performs tank truck unloading. The unloading procedures implemented by the carriers meet the minimum requirements and regulations established by the DOT (49 CFR 177.834 and 177.837).

### 8.2 Oil Delivery Procedures

The following are Bryant University's oil delivery guidelines. These guidelines are communicated to contractors selected by Bryant University for oil delivery service.

Delivery procedures implemented by the outside oil delivery contractors meet the minimum requirements and regulations established by the DOT. Absorbent materials and spill containment materials are present on each delivery truck and utilized in the event of a spill event. Bryant University requires the oil delivery contractor to use drip trays under the fill pipes to catch spills or leaks that would otherwise reach the environment. The contractor is present during delivery and has the proper spill equipment in the event of a spill during fueling.

Where installed, overfill alarms are used to prevent overfilling of tanks. The delivery contractor is always present throughout the filling process. Deliveries are always monitored by a Bryant University Facilities Management employee to ensure fueling is performed properly and without incident. Oil delivery is permitted at University locations during regular business hours, with prior notice of delivery to Facilities Management.

Tank truck unloading procedures meet the minimum requirements and regulations established by the DOT. In particular, the following procedures are observed during the filling of all bulk ASTs:



# Bryant University

1. No smoking is allowed within 50 feet while unloading oil. Bryant University is a non-smoking campus. Therefore, smoking is prohibited on campus regardless.
2. The delivery truck driver is to remain with the vehicle at all times while unloading.
3. Each delivery of oil is supervised by the delivery truck driver and a trained Bryant University Facilities Management employee. Throughout the process, each person must be alert, have unobstructed view of the delivery truck and the storage tank, as well as being within 25 feet of each. Unless the delivery truck's engine is to be used for operation of the pump, no oil shall be unloaded while the engine is running.
4. The Bryant University representative will ensure that the wheels of the delivery truck are blocked/chocked and that drip pans or oil absorbing pads are placed beneath all hose connections that might be prone to leakage.
5. Storm drains in close proximity to tanks outlined in **Section 5.1** must be covered with magnetic drain covers prior to the unloading of oil.
6. Unloading operations are to be performed only in areas designated for that purpose.
7. The unloading operation is not to begin before the level in the tank is checked and it is verified that the tank has sufficient capacity to receive the volume of oil to be transferred.
8. The drain valve on the truck is to be closed, and the unloading line is to be drained back to the tank before disconnecting the unloading line.
9. Prior to departure of the delivery truck, the lowest drain and the outlets are closely examined for leakage, and if necessary, tightened, adjusted or replaced to prevent any liquid leakage while in transit.
10. Any leakage or spillage must be immediately reported, including quantity, to Facilities Management.

These procedures shall be reviewed during all annual SPCC trainings for Bryant University oil handling personnel.



## 9.0 INSPECTIONS AND RECORDS (§112.7(e))

Aboveground oil storage tanks, oil containers, and oil-containing equipment are visually inspected on a routine basis by trained Facilities Management staff to determine if there any leaks, spills or other deficiencies. Deficiencies are reported to the Assistant Director of Facilities, or their designee, and corrected in a timely manner.

Inspection records of all tanks, containers, secondary containment, and emergency response items are maintained and reviewed by the Assistant Director of Facilities Management, or designee. Inspection checklists are presented in **Appendix D**. All records are signed by the appropriate supervisor and kept on file for a minimum of ten (10) years per the RIDEM Oil Pollution Control Regulations. Spills, leaks and/ or other problems discovered are reported and promptly corrected. Incident logs for various types of spills are maintained by Facilities Management. Bryant University incident reports are completed for spills of oil to a storm drain or surface water, in the event they occur. A Release Notification Form is included in **Appendix E**.

All records and the Oil SPCC Plan are maintained by Facilities Management and made available to RIDEM upon request. Bryant University will submit an annual inspection report to RIDEM by December 31<sup>st</sup> each year. The report will comprise the monthly inspection reports completed in the previous 12 months.

## 10.0 SECURITY (§112.7(g))

Bryant University Department of Public Safety (DPS) monitors the property. Site security is maintained 24 hours per day, 7 days per week, 365 days per year. Security rounds are conducted on all shifts and security is augmented through the use of surveillance cameras.

All equipment related to initiating the flow of oil is located behind locked doors and not accessible to unauthorized personnel campus. Any unusual environmental conditions detected are immediately reported to the Assistant Director of Facilities, or their designee. Lighting provided in and around the facilities is sufficient to provide for the observation of spills during hours of darkness and to deter acts of vandalism that could otherwise result in oil spills. Outdoor oil storage is not readily accessible to acts of vandalism.





To provide security and contingency management, all oil deliveries are monitored by a member of Bryant University Facilities Management in accordance with the strict delivery procedures identified in **Section 8.2** of this plan. The delivery of oil is monitored, and the oil directed to the proper tanks, while monitoring fueling rate and pressure. During all other times the fill ports shall be secured with a lock mechanism to prevent tampering by unauthorized persons.

## **11.0 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES (§112.7(f))**

The Bryant University training program as described below has been implemented as part of this Oil SPCC Plan.

Bryant University provides training to new oil-handling personnel involved with the operation and maintenance of equipment to prevent the discharge of oil. Additionally, annual training is provided to all oil-handling personnel. Training elements include:

- Discharge procedure protocols;
- Applicable pollution control laws, rules, and regulations;
- General facility operations; and,
- The contents of the University's Oil SPCC Plan.

Bryant University will include discharge prevention briefings for oil-handling personnel during the annual training to highlight and describe known discharges as described in 40 CFR 112.1(b), or failures, malfunctioning components, and recently developed precautionary procedures.

Bryant University personnel responsible for overseeing and responding to oil spills at the facility are provided with appropriate hazardous materials spill response training and precautionary measures. Documentation of all such training will be maintained in Facilities Management office files.

At Bryant University, Robert Dunning and Andy DeMelia are the designated persons accountable for oil spill prevention and who report to University administration.



## 12.0 SPILL RESPONSE/NOTIFICATION PROCEDURES

### (§112.7(a)(4))

This section details the response and notification procedures that are to be implemented in the event of any oil spill from Bryant University that has the potential to reach navigable waters.

### 12.1 Immediate Response & Notification

Upon discovery of a spill or leak, oil handling personnel must immediately cease any oil transfer operations until the release is stopped and cleaned up. Additionally, oil handling personnel are instructed to stop the discharge to the extent possible (considering health and safety issues). They are instructed to take immediate measures (such as deploying spill containment pillows) to contain the spill in the immediate area and prevent the oil from reaching a floor drain or storm drain, or navigable waters. No chemical agents, additive, sinking agents, etc. may be used without consent of the Office of Emergency Response (OER).

After taking initial containment measures, the person discovering the spill must notify the following:

Name	Title	Office Phone Number	Cell Phone / 24 Hour Number
Robert Dunning	Assistant Director of Facilities	(401) 232-6912	(401) 209-0198
Andy DeMelia	AVP of Facilities Management	(401) 232-6082	(508) 728-1820

Once in contact with one of the above, be prepared to provide the following information:

- Location, date, and time of release;
- An assessment of the potential for the release reaching a catch basin, floor drain, or release to the sewer, or discharge over land to a navigable waterway, wetland or other sensitive receptors;
- Type of oil released (e.g., No. 2 oil, waste cooking oil, diesel);



- Approximate quantity of oil released;
- Source of release;
- Description of release;
- Name and telephone number of the responsible person in the area where the release occurred;
- Description of immediate response actions taken; and
- Any other information, including potential environmental impacts, that is relevant to assessing the degree of the hazard posed by the release.

The Assistant Director of Facilities or their designee, will contact a Response Contractor as necessary. In the event of a spill where the Response Contractor is contacted, the Response Contractor will provide professional services for the containment, removal, and disposal of all contaminated material.

For spills that have reached or have the potential to reach a floor drain, catch basin, sanitary or storm sewer, or another sensitive receptor, notification of appropriate regulatory agencies will be made as soon as possible by the Assistant Director of Facilities, or designee, as outlined below.

A record of all calls will be logged at the Facilities Management office for compliance notification.

## **12.2 Spill Notification and Reporting (§112.7(a)(3)(vi))**

Releases of oil should be immediately reported by phone to RIDEM:

- If 8:30am - 4:00pm on a weekday, call 222-1360 Office of Emergency Response (OER)
- All other times call 222-3070 (Division of Law Enforcement)

If a reportable quantity (as defined by federal and state regulations) has been released, the agency contacts listed under the respective scenarios will be notified by telephone. The following table contains a list of outside responders and agencies that may need to be notified of an oil release:



Authority	Notify	Telephone
Town of Smithfield Fire Department	To Report a Fire, Environmental Emergency	911
Rhode Island Department of Environmental Management	Oil Spill or Release	(401) 222-3070 (24 hr) (401) 222-1360 (Business Hours)
National Response Center	Environmental Emergency	800-424-8802
US Environmental Protection Agency Regional Administrator (Region I)	Environmental Emergency	888-372-7341
Local Emergency Planning Commission (District 1)	Environmental Emergency	(401) 766-2500
Ambulance/Medical Emergency	Medical Emergency	911
Smithfield Sewer Authority	Spill to Sewer/Storm Drain	(401) 231-1506
PAL Environmental Services	Oil Spill Clean-Up	(401) 232-3353
Triumvirate Environmental	Oil Spill Clean-Up	800-966-9282

The personnel providing notification should be prepared to offer the following information:

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

Following completion of initial response and notification activities Facilities Management personnel will restock emergency equipment, restore the impacted area, and properly manage contaminated debris as necessary.



## 12.3 Federal Requirements for Oil Spill Reporting (§112.4(a))

Under 40 CFR Part 110, the National Response Center (NRC) must be contacted immediately if a discharge of oil reaches waters of the United States. Discharges of oil must be reported if they "cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines."

The US EPA must be contacted immediately if a discharge of more than 1,000 gallons in a single discharge or more than 42 gallons in each of two discharges occur within any 12-month period, or if oil reaches a navigable waterway or adjoining shoreline. The following information is required to be submitted to the RA of Region I within 60 days (40 CFR 112.4(a)):

- Name of facility;
- Name(s) of the owner or operator of the facility;
- Location of the facility;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Corrective action and countermeasures that were taken, including a description of equipment repairs and replacements;
- An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary;
- The cause(s) of such discharge, including a failure analysis of system or subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the RA may reasonably require pertinent to the Plan or discharge.

Copies of this report should be sent to the following address:

**U.S. EPA Region 1  
U.S. Environmental Protection Agency  
Region 1 - New England  
1 Congress Street Suite 1100  
Boston, MA 02114**



## 12.4 State Requirements for Oil Spill Reporting

RIDEM requires notification in the event of an oil spill of any amount immediately at (401) 222-1360 (Office of Emergency Response) during normal business hours (Mon-Fri 8:30am-4pm) or (401) 222-3070 (Division of Law Enforcement) for 24-hour response.

Written report(s) for spills are required to be provided to RIDEM within ten (10) calendar days following initial discovery of the incident. The contents of this report must include:

- a. Date, time and place of release;
- b. Names, addresses and telephone numbers of all persons potentially responsible or liable for such release, including those involved in oil transfer operations;
- c. Amount and type of material released;
- d. Complete description of containment and removal operation, including costs of these operations;
- e. Complete description of circumstances causing the release;
- f. Description any third-party damages; and
- g. Procedures, methods and precautions instituted or planned to prevent an event from recurring.

A RIDEM Hazardous Material Release Notification Form is included within **Appendix E**.



## 13.0 Substantial Harm Criteria Evaluation (§112.20)

In accordance with 40 CFR Part 112.20, Bryant University is required to determine whether the facility is subject to the Facility Response Plan (FRP) requirements and associated appendices if it is a high-risk facility that poses a threat of *substantial harm* to the environment. As outlined in 40 CFR 112.20(f)(1), a facility has the potential to cause substantial harm if:

- The facility transfers oil over water to or from vessels **and** has a total oil storage capacity, including both ASTs and USTs, greater than or equal to 42,000 gallons; or
- The facility's total oil storage capacity, including both ASTs and USTs, is greater than or equal to one million gallons, **and** one of the following is true:
  - The facility lacks secondary containment able to contain the capacity of the largest AST within each storage area plus freeboard to allow for precipitation;
  - The facility is located at a distance such that a discharge from the facility could cause injury to an environmentally sensitive area;
  - The facility is located at a distance such that a discharge from the facility would shut down a public drinking water intake;
  - The facility has had a reportable spill greater than or equal to 10,000 gallons within the last five years.

Bryant University does not meet the substantial harm criteria in accordance with 40 CFR Part 112.20, and therefore does not have to prepare and submit a Facility Response Plan to the EPA. A certification of the Applicability of the Substantial Harm Criteria Checklist is included below. Additional information on Substantial Harm Criteria is included in **Appendix C**.



## 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.

---

NAME

---

SIGNATURE

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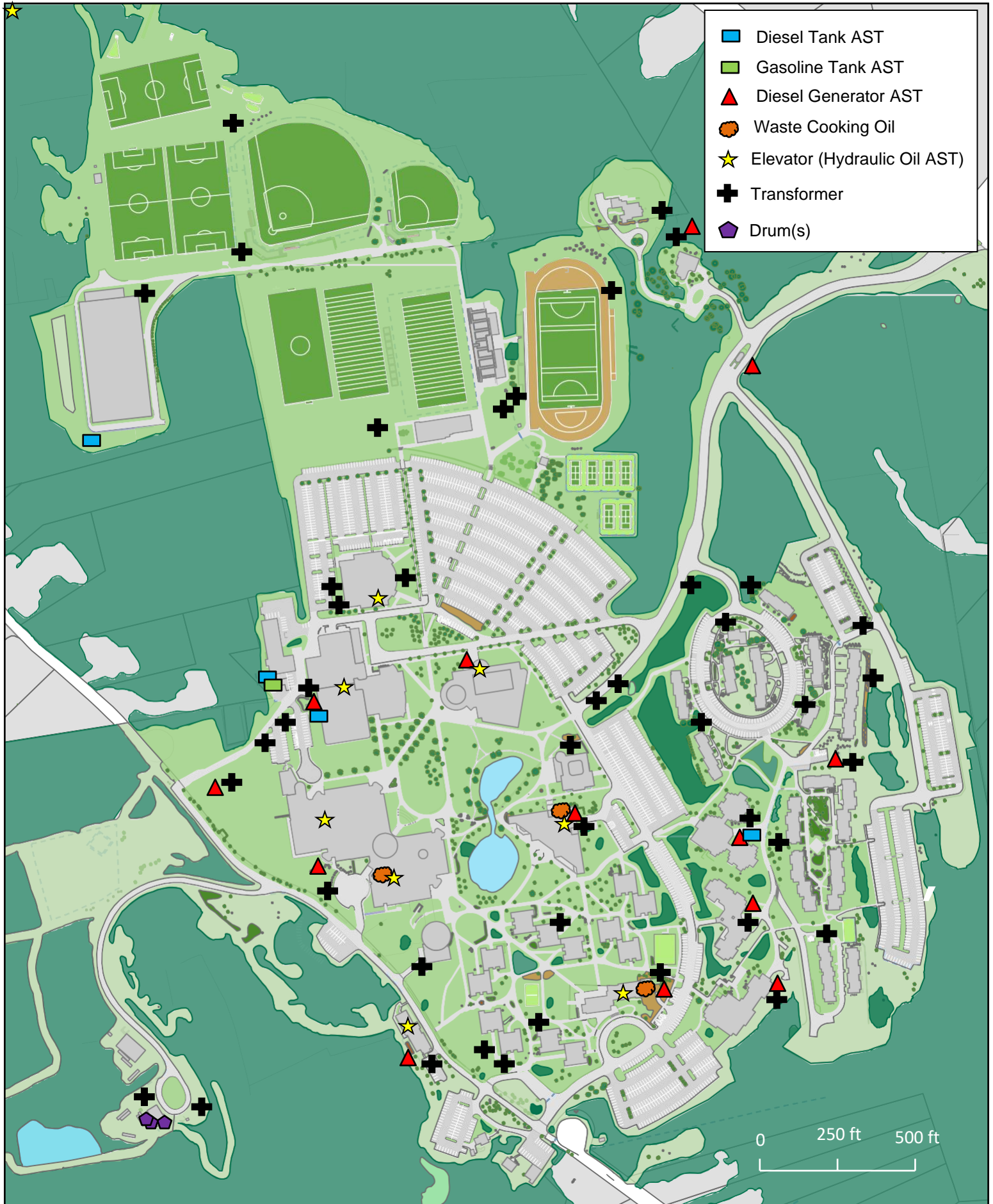
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Bryant University

## Appendix A: Facility Site Plan



Bryant University

Bryant University  
Oil SPCC  
Campus Map



## Appendix B: Oil Storage Inventory, Spill Prediction, and Impacts Assessment

Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
<b>Aboveground Storage Tank (Generators)</b>							
	Bello Center	Emergency Generator (AST)	170	Diesel	Double-walled steel	Outside	Non-Directional
	Callahan House (President's Residence)	Emergency Generator (AST)	60	Diesel	Double-walled steel	Outside	Non-Directional
	Chaffee (OPS Center)	Emergency Generator (AST)	150	Diesel	Double-walled steel	Outside	Non-Directional
	Entry Control Station (DPS)	Emergency Generator (AST)	112	Diesel	Double-walled steel	Outside	Non-Directional
	Fisher Center	Emergency Generator (AST)	700	Diesel	Double-walled steel	Outside	Non-Directional
	Gym/MAC	Emergency Generator (AST)	500	Diesel	Double-walled Convault	Outside	Non-Directional to adjacent paved surface
	Hall 14	Emergency Generator (AST)	125	Diesel	Double-walled steel	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
	Hall 15	Emergency Generator (AST)	300	Diesel	Double-walled steel	Outside	Non-Directional
	Hall 16	Emergency Generator (AST)	500	Diesel	Double-walled Convault	Inside	Non-Directional; Would be contained within building.
	Hall 17	Emergency Generator (AST)	300	Diesel	Double-walled steel	Outside	Non-Directional
	Physical Plant (Portable Generators)  (not on map; <55 gal)	Emergency Generator (AST)	8 (2)	Diesel	Double-walled steel	Outside/Inside	could potentially be contained in building if inside)
	Smith House/VSPA (Portable)  (not on map; <55 gal)	Emergency Generator (AST)	6	Diesel	Double-walled steel	Outside/Inside	Non-Directional (Would depend on location, could potentially be contained in building if inside)
	Strength and Conditioning (Portable)  (not on map; <55 gal)	Emergency Generator (AST)	8	Diesel	Double-walled steel	Outside/Inside	could potentially be contained in building if inside)



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
	Townhouse N (Sewer Lift Station)	Emergency Generator (AST)	60	Diesel	Double-walled steel	Outside	Non-Directional
	Unistrucre (B+C)	Emergency Generator (AST)	2000	Diesel	Double-walled steel	Outside	Non-Directional
	Unistrucre (MRC, A, PAC)	Emergency Generator (AST)	687	Diesel	Double-walled steel	Outside	Non-Directional
<b>Aboveground Storage Tanks</b>							
	CIAC Fire Pump Engine Tank	AST	115	Diesel	Double-walled steel	Outside	Non-Directional
	Facilities Building	AST	1000	Diesel	Double-walled convault	Outside (Spill response materials located nearby)	Non-Directional to adjacent paved surface
	Facilities Building	AST	3000	87 Octane (Gasoline)	Double-walled convault	Outside (Spill response materials located nearby)	Non-Directional to adjacent paved surface
	Gym/MAC Day Tank	AST	60	Diesel	Double-walled steel	Outside	Non-Directional
	Hall 16 Day Tank (not on	AST	35	Diesel	Double-walled steel	Inside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
	map; <55 gal)						
	Unistrucre	AST	200	Waste cooking oil #1	Contained within building	Inside	Non-Directional to building floor
	Fisher Center	AST	200	Waste cooking oil #2	Contained within building	Inside	Non-Directional to building floor
	Hall 17	AST	75	Waste cooking oil #3	Contained within building	Inside	Non-Directional to building floor
<b>Drum(s)</b>							
	Grounds storage shed	Drum	55	Waste oil	Spill pallet	Inside	Non-Directional, spill would be contained within spill pallet
	Grounds storage shed	Drum(s)	110	Motor Oil	Spill containment on ground	Inside	Non-Directional, spill would be contained within grated floor
<b>Transformers</b>							
#1	Unistrucre Rear Circle	Transformer	487	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#2	Fisher Center	Transformer	325	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#3	Lower Maintenance	Transformer	170	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#5	Provost	Transformer	150	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#6	Hall 14	Transformer	200	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#7	Charging station	Transformer	150	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#13	Townhouse C	Transformer	140	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#14	Townhouse E & D	Transformer	219	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#15	Townhouse G	Transformer	219	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#19	Hall 15	Transformer	285	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#20	Senior Townhouse apartments H-M	Transformer	205	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#21	Hall 16	Transformer	315	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#22	Townhouse A & B	Transformer	135	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#23	Hall 2	Transformer	245	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#24	Between Hall 8 and 9	Transformer	245	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#25	Bulldog Stadium	Transformer	200	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#26	Athletic field complex	Transformer	200	Non-PCB Transformer Oil	Full containment	Outside	Non-Directional
#27	Hall 3, switch #2	Transformer	227	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional





Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#28	Hall 3, switch #1	Transformer	227	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#29	Lighting transformer located on Jacob's Drive	Transformer	125	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#30	Subfeed switch fdr #1 located on Jacob's Drive	Transformer	88	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#31	Subfeed switch fdr #2 located on Jacob's Drive	Transformer	88	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#32	Gym Transfer Switch	Transformer	149	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#33	Gym/MAC – outside of physical plant offices	Transformer	330	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#34	Koffler communication studio	Transformer	312	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#35	Turf field Lighting	Transformer	120	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#36	Sewer lift station	Transformer	120	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#37	Townhouse N Block	Transformer	418	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#38	Hall 17	Transformer	460	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#39	Chaffee (on separate feeder)	Transformer	180	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#40	UNI II-MRC	Transformer	680	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#41	Callahan house	Transformer	185	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#42	Interfaith Center	Transformer	291	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#43	Townhouse O+P	Transformer	307	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#44	Townhouse N parking lot	Transformer	307	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#45	Athletic Field Switch	Transformer	150	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#46	Lower Maintenance Xfer Switch	Transformer	149	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#47	AIC Switch	Transformer	88	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#48	AIC Switch	Transformer	88	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#49	Strength and conditioning	Transformer	137	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#50	CIA Complex	Transformer	253	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
#51	AIC	Transformer	328	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
#52	Football Field	Transformer	213	Non-PCB Transformer Oil	Cement pad	Outside	Non-Directional
<b>Elevators</b>							
	Unistructure #1	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Unistructure #2	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Fisher Center	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Bello Center	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Chafee Center	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional



Number	Location	Container Type	Capacity (Gallons)	Product	Secondary Containment	Outside/Inside	Direction and Rate of Flow of Potential Spill (if secondary containment fails)
	AIC	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Hall 17	Elevator reservoir	250	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Wellness Center	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional
	Koffler building	Elevator reservoir	130	Hydraulic oil	Cement floor, contained within room	Inside	Non-Directional

## Appendix C: Applicability of Substantial Harm Criteria

### From EPA Website:

(<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations/facility-response-plan-frp-applicability>)

### **Facility Response Plan (FRP) Applicability**

Facilities that could reasonably be expected to cause "substantial harm" to the environment by discharging oil into or on navigable waters are required to prepare and submit Facility Response Plans (FRPs). Facilities that could cause "significant and substantial harm" are required to have their plans approved by an EPA Regional Administrator (RA).

### **Significant and Substantial Harm**

Facilities may be identified as posing substantial harm either through a self-identification process, or by the determination of an RA.

### **Substantial Harm**

A facility may pose "substantial harm" according to the FRP rule if it:

- has a total oil storage capacity greater than or equal to 42,000 gallons and it transfers oil over water to/from vessels; or
- has a total oil storage capacity greater than or equal to 1 million gallons and meets one of the following conditions:
  - does not have sufficient secondary containment for each aboveground storage area.
  - is located at a distance such that a discharge from the facility could cause "injury" to fish, wildlife, and sensitive environments.
  - is located at a distance such that a discharge from the facility would shut down a public drinking water intake.
- has had, within the past five years, a reportable discharge greater than or equal to 10,000 gallons.

If the facility does not meet the criteria (either under 1 or 2), then the facility is not subject to the FRP rule via self-identification.

The criteria presented here represents the self-identification criteria to be used by the facility owner/operator to determine if the facility is subject to the FRP rule. If the facility meets the criteria, an FRP is required to be prepared and submitted to the appropriate EPA Regional Office. For more



information on self-selection, please see: Section 112.20 of the Oil Pollution Prevention regulation and Attachment C-II Certification of the Applicability of the Substantial Harm Criteria.

Once the certification form and FRP are submitted to the region, the RA will review and determine if the facility should be classified as a significant and substantial harm facility. If the RA determines that the facility could cause significant and substantial harm, the FRP requires approval by the RA.

## **Significant and Substantial Harm**

An RA determines if a facility could, because of its location, cause significant and substantial harm to the environment by discharging oil into or on the navigable waters and adjoining shorelines. This is determined by factors similar to the substantial harm criteria, as well as:

- the age of tanks;
- type of transfer operations;
- oil storage capacity;
- lack of secondary containment;
- proximity to fish, wildlife, and sensitive environments or drinking-water intakes;
- spill history and frequency of past discharges; or
- other information, including local impacts on public health.

Facilities that pose significant and substantial harm must have their plans reviewed and approved by EPA.

## Appendix D: Oil Storage Inspection Checklist



# Appendix D: Oil Storage Inspection Checklist

Date: \_\_\_\_\_

Inspector: \_\_\_\_\_

**Bryant University**  
 1150 Douglas Pike  
 Smithfield, RI 02917-1284  
 (401) 232-6000

Location	Tank or Container	Capacity (gallons)	Product	Secondary Containment	Does the tank(s) show signs of settlement, structural or foundation weakness and/or swelling of tank insulation?	Does the tank(s) show signs of cracks, areas of water, corrosion or	Is the area around the tank free of any visible signs of leakage?	Does the piping show signs of corrosion or leaks?	Does the pump or hoses show signs of leaks or cracking?	Is the tank gauge readable at the fill point and operating as designed?	Is all leak detection, monitoring, cathodic protection and or warning systems operating as designed?	Is there liquid in the primary tank, interstice, dike, or spill container?	Is the overfill prevention equipment in good working condition?	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation?	Is there debris in containment or spill container, and is the spill container in good condition?	Are the dike drain valves or plugs operable and in a closed position?	Are there any other conditions that should be addressed regarding the safe operation of the tank system?	Comments
<b>Emergency Generator ASTs</b>																		
Bello Center	Emergency Generator (AST)	170	Diesel	Double-walled steel														
Callahan House (President's Residence)	Emergency Generator (AST)	60	Diesel	Double-walled steel														
Chaffee (OPS Center)	Emergency Generator (AST)	150	Diesel	Double-walled steel														
Entry Control Station (DPS)	Emergency Generator (AST)	112	Diesel	Double-walled steel														
Fisher Center	Emergency Generator (AST)	700	Diesel	Double-walled steel														
Gym/MAC	Emergency Generator (AST)	500	Diesel	Double-walled Convault														
Hall 14	Emergency Generator (AST)	125	Diesel	Double-walled steel														
Hall 15	Emergency Generator (AST)	300	Diesel	Double-walled steel														
Hall 16	Emergency	500	Diesel	Double-walled Convault														
Hall 17	Emergency	300	Diesel	Double-walled steel														
Smith House/VSPA (Portable)	Emergency	6	Diesel	Double-walled steel	<b>Under 55 Gallon Threshold - Oil SPCC Does Not Apply</b>													
Strength and Conditioning (Portable)	Emergency Generator (AST)	8	Diesel	Double-walled steel	<b>Under 55 Gallon Threshold - Oil SPCC Does Not Apply</b>													
Townhouse N (Sewer Lift Station)	Emergency Generator (AST)	60	Diesel	Double-walled steel														
Unistructure (B+C)	Emergency Generator (AST)	2000	Diesel	Double-walled steel														
Unistructure (MRC, A, PAC)	Emergency Generator (AST)	687	Diesel	Double-walled steel														

# Appendix E: RIDEM Release Notification Report Form

## Office of Land Revitalization & Sustainable Materials Management Site Remediation Section

### HAZARDOUS MATERIAL RELEASE NOTIFICATION FORM

THIS FORM IS NOT TO BE USED TO REPORT AN IMMINENT HAZARD

**1. Notifier Information:**

Name:

Address:

Phone:

Email:

Status:       Environmental Professional       Secured Creditor  
                  Owner       Voluntary  
                  Operator

If Environmental Professional is selected, please supply the follow information for your client below:

Name:

Address:

Phone:

Email:

Status:       Owner       Secured Creditor  
                  Operator       Voluntary

**2. Property Information:**

Name of Site:

Site Address:

Plat/Lot Numbers:

Approximate Acreage of Property:

Latitude/Longitude:

Site Land Usage Type:       Residential       Industrial/Commercial

Location of Release (Attach site sketch as necessary):

**3. Release Information:**

Date of Discovery:

Source:



# Bryant University

Release Media:

Hazardous Materials and Concentrations (Attach certificates of analysis as necessary):

Extent of Contamination:

Approximate acreage of Contaminated Area:

**4. Resource Information:**

- Site Land Usage:  Industrial/Commercial  Residential
- Adjacent Land Usage:  Industrial/Commercial  Residential
- Site Groundwater Class:  GA/GAA  GB
- Adjacent Groundwater Class:  GA/GAA  GB  
(if different than site groundwater classification within 500 feet)
- Nearest Surface Water or Wetland:  Less Than 500 Feet  Greater Than 500 Feet
- Potential for adverse impact?  Yes  No

**5. Potentially Responsible Parties:**

Name:

Address:

Status:  Owner  Operator  Other:

Name:

Address:

Status:  Owner  Operator  Other:

**6. Measures taken or proposed to be taken in response to Release:**

- Check all that apply:  Site Investigation  Short-Term/Emergency
- EXPRESS Policy  Dig & Haul Policy

**7. Other significant remarks about Release (Will a background determination be made?)**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Title: \_\_\_\_\_