Prepared for The University of Mississippi, Oxford, Mississippi



SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN

[This plan satisfies the Federal Water Pollution Act (FWPCA) for an Oil Spill Prevention Control and Countermeasures (SPCC) Plan (40 CFR Part 112)]

February 20, 2004

Prepared By



Fisher & Arnold Environmental, A Division of Fisher & Arnold, Inc.

3205 Players Club Parkway (888) 583-9724

Memphis, Tennessee 38125 Fax (901) 748-3115

Spill Prevention Control And Countermeasures Plan University of Mississippi

Prepared for: The University of Mississippi Oxford, Mississippi

Prepared by:
Fisher & Arnold Environmental
a division of
FISHER & ARNOLD, INC.
Memphis, Tennessee

February 20, 2004

This plans satisfies the Federal Water Pollution Control Act (FWPCA) for an Oil Spill Prevention Control and Countermeasures (SPCC) Plan (40 CFR Part 112)

Emergency Coordinators

Emergency Coordinator	Name	Telephone Number
Primary	Edward Movitz Oxford, MS 38655	Work: (662) 915-5433 Home: (662) Cell: (662)
Secondary	Terron Jones University, MS 38677	Work: (662) 915-7051 Home: (662)
Additional	Dispatcher Old Power Plant University, MS 38677	Work: (662) 915-7087

Emergency Contacts

Emergency	Organization/Agency	Emergency Number
Injury	Dispatcher – PPD	Work: (662) 915-7087
Hospital	Baptist Memorial North Mississippi	Work: (662) 232-8100
	Ambulance Service	911
Fire/Explosions	Fire Department	911
Hazardous Waste Release	Health & Safety	(662) 915-5433
If Release Leaves Site	Mississippi Emergency Management Agency	1-800-222-6362
If Release Reaches Navigable Water	National Response Center	1-800-424-8802
	Mississippi Department of Environmental Quality	(8:00 a.m. – 5:00 p.m. only): (601) 961-5171

CERTIFICATION

Name of Facility:

University of Mississippi

Type of Facility:

Public University

Owner/Operator:

The University of Mississippi

Address:

Oxford, Mississippi

Telephone Number:

(662) 915-7087 (Dispatcher)

Facility Personnel Responsible for Spill

Prevention:

Edward Movitz

Telephone Number:

(662) 915-5433

Management Approval

This SPCC Plan will be implemented as herein described.

Signature

Edward Movitz

Title:

Name:

University Health and Safety Officer

Engineering Certification

I hereby certify that (i) I am familiar with the requirements of the SPCC rule; (ii) my agent has visited and examined the facility; (iii) the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (iv) procedures for required inspections and testing have been established; and, (v) the Plan is adequate for the facility.

Gene M. Bailey, P.

Registered Professional Engine

Signature

Registration No

TABLE OF CONTENTS

Page

Emergency Coordinators

Emergency Contacts

Certification

2.0	GEN	TERAL INFORMATION
	2.1	Review and Revision of Plan
	2.2	Emergency Coordinators
3.0	SPIL	L PREVENTION AND CONTROL & COUNTERMEASURES 2
	3.1	Previous Spills
	3.2	Predicted Flow of Contaminants
	3.3	Containment Dikes
	3.4	Emergency and Spill Containment Equipment
	3.5	Facility Drainage
	3.6	Security
	3.7	Training
	3.8	Inspection and Spill Report Records
4.0	CON	VTINGENCY PLAN 6
	4.1	Hazards Associated with Materials Used and Stored at the Facility
	4.2	Control Procedures for Potential Hazards
		4.2.1 Fire and/or Explosion
		4.2.2 Release of Petroleum Products
	4.3	Emergency Response Procedures
		4.3.1 Notification
		4.3.2 Assessment
		4.3.3 Evacuation Plan
	4.4	Post-Emergency Management
		4.4.1 Prevention of Recurrence
		4.4.2 Storage and Treatment of Released Material
		4.4.3 Equipment Maintenance
	~	* **
5.0	SUB	MISSION OF SPILL NOTIFICATION13

TABLE ON CONTENTS, CONTINUED

APPENDICES

Appendix A	Figures
Figure 1 Figure 2 Figure 3 Figure 4 Figure 5 Figure 6 Figure 7 Figure 8	Campus Topographic Map Airport Topographic Map Generation Facility Rebel Substation 40,000 Gallon Diesel Tanks South Substation North Substation Airport Tanks
Appendix B	Tables
Table 1 Table 2 Table 3 Table 4	Emergency Coordinators Emergency Equipment First-Aid Supplies Emergency Contacts
Appendix C	Certification of the Applicability of the Substantial Harm Criteria
Appendix D	Containment Evacuation Record SPCC Plan Monthly Checklist Spill Report Training Log
Appendix E	MSDS

REGULATORY CROSS-COMPARISON MATRIX

EPA's GENERAL REQUIREMENTS FOR SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLANS (40 CFR 112) (July 17, 2002)

40 CFR 1	12.5 Regulatory Citations(s)	Section
112.5(b)	Period of Review Changed from 3 to 5 Years	2.1
	12.7 Regulatory Citations(s)	
112.7(a)(1		
112.7(a)(2		
112.7(a)(3		
	ype Of Oil in Each Container3	
	ischarge Prevention Methods	
	ischarge Controls	
A	ountermeasures for Discharges	
(v) D	isposal Methods for Recovered Materials	4.4.2
(vi) N	otification List in Case of Discharge	A A
112.7(a)(4		
112.7(a)(5		
112.7(b)	Prediction of Flow of Oil	
112.7(c)	Description of Secondary Containment	3.2/3.3
112.7(d)	Description of Response Actions if no Secondary Containment Pro	vided 3.2
112.7(e)	Written Inspection Procedures	3.8
112.7(f)	Personnel Training Requirements	3.7
112.7(g)	Security Provisions	3.6
112.7(h)	Tank Truck Loading/Unloading	
40 CFR 1	12.8 Regulatory Citations(s)	
112.8(b)	Facility Drainage	3.2
112.8(c)(1		
	ulk Storage Containers Equipped with Secondary Containment	
12 12 1	revent Uncontrolled Discharge from Containment Areas	
13 (25)	rotect Buried Portions of Bulk Containers against Corrosion	
	rotect Partially Buried Portions of Bulk Containers against Corrosion	
	est Each Bulk Storage Container for Integrity on a Regular Schedule	
	ontrol Leakage from Defective Heating Coils	
	nstall Overfill Alarm Devices	
	ffluent from Treatment Facilities	
	romptly Remove Accumulations of Oil in Contained Areas	
	rovide Containment for Mobile/Portable Containers	

1.0 INTRODUCTION

This Spill Prevention Control and Countermeasures (SPCC) Plan has been prepared in accordance with the Environmental Protection Agency (EPA) Regulations on Oil Pollution Prevention (40 Code of Federal Regulations (CFR) Part 112). The SPCC plan addresses actions to be taken by University of Mississippi personnel to prevent and contain a release of AV fuel, gas, diesel or transformer oil.

Whenever a significant release of oil occurs or is imminent, the Emergency Coordinator will be contacted immediately by University personnel, and the Contingency Plan will be carried out. The specific procedures that the Emergency Coordinator will follow to implement the Contingency Plan are detailed in Section 4.0. This plan also addresses the procedures to be followed by the University in the event of an emergency because of fire or explosion.

The SPCC plan has been reviewed and certified by a Registered Professional Engineer to verify that it has been prepared in accordance with good engineering practices. This plan meets the requirements specified in 40 CFR 112 for the University of Mississippi.

In the event that revisions to this plan are necessary, please contact Mr. Ed Movitz, Health and Safety Officer for the University of Mississippi, University, Mississippi, telephone number (662) 915-5433. Mr. Movitz is also the technical contact for the Plan.

2.0 GENERAL INFORMATION

The University of Mississippi is a public university located in University, Mississippi. The SPCC plan addresses response procedures for a release of petroleum products from the three electrical substations, the fueling of the underground gas tanks, the diesel fueling tanks, the diesel tanks for the generation facility, the electrical equipment for the generation facility and the fuel tanks stored at the airport. Activities included in this plan associated with the University are fueling maintenance vehicles and airplanes, operating electrical substations and operating an electrical generation plant. Further discussion of the hazards associated with these materials is in Section 4.0.

Figures 1 and 2 show the University and the airport including the location of the substations, generation facility, and tanks. Individual figures for the equipment are shown in Figures 3-8.

2.1 Review and Revision of Plan

If no spills or releases of petroleum products occur, this Plan will be reviewed, and revised as necessary, at least once every five years. Amendments to this plan will also be made if any major changes in facility design, construction, operation or maintenance occur, if the applicable regulations are revised, if the list of emergency coordinators is changed or the available emergency equipment is changed.

The SPCC Plan may also require revision if more than 1,000 gallons of oil is discharged into navigable waters in a single spill event or 42 gallons or more of oil is discharged in two (2) spill events within any 12 month period. Should either of these events occur, then the University shall notify the Environmental Protection Agency (EPA) Region 4 Administrator within 60 days of the event. This SPCC plan will then be revised, as necessary. Any revisions to the SPCC Plan must be reviewed and certified by a Registered Professional Engineer.

A copy of the Certification of the Applicability of the Substantial Harm Criteria is found in Appendix C.

2.2 Emergency Coordinators

The University has appointed a Primary Emergency Coordinator, one secondary coordinator and an alternate coordinator, as listed in Table 1 of Appendix B. At all times, one of these individuals will be either at the University or on call and able to reach the University in a short period of time in case of an emergency. These coordinators have the authority to commit the resources necessary to carry out this Plan and its contingency plan, as necessary. The Emergency Coordinators may be contacted during working hours. Home telephone numbers and/or cell phone numbers for the primary and secondary emergency coordinators are also listed in Table 1 in Appendix B.

The Primary Emergency Coordinator is also the designated person responsible for spill prevention.

3.0 SPILL PREVENTION CONTROL AND COUNTERMEASURES

3.1 Previous Spills

No spills, which would require the submission of a report, have occurred at the University during the past 12 months.

3.2 Predicted Flow of Contaminants

Generation Facility

The generation facility consists of four 1,000 gallon transformers, ten 200 gallon diesel day tanks and three 15,000 gallon double walled diesel tanks. Should a transformer oil or an indoor day tank leak, the released fluid would be expected to flow within the secondary containment of each tank or flow to the subsurface 5,000 gallon overflow tank shown on Figure 3. A fuel leak from the double walled tanks would be contained within the double wall configuration. The fueling of the double walled tanks is protected from leaks at the connection to the tanks by a spill box. A leak occurring at the connection to the truck would be contained by placing a curb

block prior to fueling at the storm drain at the curb in the front of the generation facility during the entire fueling process.

The maximum flow rate at the facility would vary depending on the size of the diesel fueling tank that would be delivering fuel to the three 15,000 gallon tanks. Leaks associated with the four transformers would be much less than this amount. The amount of diesel fuel in any single delivery truck is estimated to be 6,000 gallons. Estimated flow rates would range from 0.5 to 50 gallon per minute (gpm). Emptying any on-site delivery tanker could take less than one (1) hour from an equipment failure (leak or rupture).

Due to the age and pump shut off contingencies associated with the 15,000 gallon fuel tanks, the likelihood of a catastrophic release from these tanks is considered very low. The fueling of the tanks will be monitored during the entire process to minimize any leak that may occur. During the fueling of the diesel tanks, wheel chocks will be used to prevent the tank truck from leaving prior to disconnection. Prior to the truck leaving the facility, the valves and connections will be checked for leaks and tightened if necessary.

The double walled tanks are the only tanks that qualify as "bulk storage tanks" under 40 CFR 112. The electrical transformers and diesel day tanks are part of electrical equipment that is excluded from the definition of bulk storage tanks. The 15,000 gallon tanks are constructed of steel, which is compatible with diesel. The double walled configuration would contain the entire contents of the tank in the event of a leak. There are no buried components to the tanks. All piping supports are designed to prevent corrosion and abrasion and allow for expansion and contraction. The tanks are elevated on saddles, with all sides visible. Monthly visual inspection of the tanks provides adequate environmental protection.

Rebel Substation

Rebel Substation is located adjacent to the generation facility. The substation includes two transformers with 2,000 gallons of oil each and nine regulators with 150 gallons of oil each. Figure 4 shows the location of the transformers and regulators. The electrical equipment does not qualify as bulk storage containers.

Currently, there is no containment for the substation oil-filled equipment. The gravel at the substation should be increased to 6" deep to provide adequate environmental protection. If a small oil leak occurred in the equipment, it would be detected during the weekly inspections of the substation. If a significant oil leak occurred, a power outage would alert the University to the problem and inspectors would be sent to the substation immediately.

40,000-Gallon Diesel Tanks

Two 40,000 gallon above ground diesel tanks are located adjacent to the football stadium, between the generation plant and the Physical Plant for the University, as shown on Figure 5. The tanks are used to store diesel for fueling of maintenance vehicles and the emergency generators. Underground piping is used to transfer the diesel to the dispenser and to the generators. Currently, only one tank is in use at a time. The diesel tanks are surrounded by a soil berm to contain any spills from the tanks. The berm is drained by a pipe with a valve. The valve is only opened once the accumulated storm water is inspected for signs of contamination (sheen, discoloration, etc.). If no signs of contamination are present, the storm water is released from the containment. If impacts are visible, the sheen is removed using oil absorbent pads before the water is released. The drainage of the containment is documented and records are maintained for three years.

If any maintenance is done to the buried, underground piping, cathodic protection and a protective wrapping will be installed on the piping. Any piping exposed for any reason will be inspected for corrosion, damage or leaks.

The soil berm was measured on December 9, 2003, to be 35' by 41' by 2' deep. This allows for a storage capacity of only 16,000 gallons, with no room for precipitation. The berm around the tanks will be increased to contain 40,000 gallons plus an extra six inches of depth to account for rainfall.

The fueling connection for the tanks is located within the secondary containment. If a leak occurs at this point during the fueling of the diesel tanks, the leak would be contained. Absorbent socks will be placed around the tank truck to contain any leak from the tank truck connection. The fueling of the tanks will be monitored during the entire process to minimize any leak that may occur. During the fueling of the diesel tanks, wheel chocks will be used to prevent the tank truck from leaving prior to disconnection. Prior to the truck leaving the facility, the valves and connections will be checked for leaks and tightened if necessary.

The 40,000 gallon tanks qualify as bulk storage tanks under 40 CFR 112. The diesel tanks are constructed from steel and are compatible with their contents. They have flat bottoms and are set on the ground. Visual inspections and either hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing or another system of non-destructive shell testing will be employed annually for the first three years to test the integrity of the tanks. Once an integrity trend is identified through the testing, the testing frequency will be revised.

Adjacent to the two diesel tanks is a small, underground gas tank. The gas tank is not covered under 40 CFR 112, but the fueling of the tank is covered in this plan. Absorbent socks will be placed around the tank truck to contain any leak from the fueling process. The fueling of the tank will be monitored during the entire process

to minimize any leak that may occur. During the fueling of the tank, wheel chocks will be used to prevent the tank truck from leaving prior to disconnection. Prior to the truck leaving the facility, the valves and connections will be checked for leaks and tightened if necessary.

South Substation

The South Substation consists of two transformers with 988 gallons and 1,300 gallons of transformer oil, as shown on Figure 6. The South Substation has no containment and drains into a storm drain along Fraternity Row. Containment, in the form of a curbing system with a flow through valve, will be installed at the substation. If a small oil leak occurred in the equipment, it would be detected during the weekly inspections of the substation. If a significant oil leak occurred, a power outage would alert the University to the problem and inspectors would be sent to the substation immediately.

North Substation

The North Substation is located behind the Health Center on campus, as shown on Figure 7. The North Substation consists of one 825 gallon transformer. Because the total number of gallons at this substation is below 1,320 gallons, this substation is not regulated under 40 CFR 112.

Airport Fuel Tanks and Trucks

Two 10,000 gallon, double walled, steel tanks are located at the airport facility owned by the University of Mississippi, as shown on Figure 8. The tanks are used to fuel airplanes at the airport. The tanks are located within a spill containment curbing, which drains into the loading area. The loading area is a depressed, drive through, concrete pad with a drain. The drain leads to a 750 underground storage tank with a valve. The valve is closed at all times. When the tank is filled with storm water, the valve is opened and the water is released. The release of the storm water is documented in Appendix D. Once the water is released, the valve is closed again and locked.

Adjacent to the AV tanks are two tank trucks (2,200 gallons and 600 gallons) used to transport the fuel onto the run way to fuel the planes. The tank trucks are stored full of fuel. No containment exists currently for the tank trucks. A dike system will be designed to direct the flow from the trucks into the AV tank containment area.

The 10,000 gallon fuel tanks qualify as bulk storage tanks under 40 CFR 112. The tanks are constructed from steel and are compatible with their contents. The double walled configuration would contain the entire contents of the tank in the event of a leak. There are no buried components to the tanks. The tanks are elevated on saddles,

with all sides visible. Monthly visual inspection of the tanks provides adequate environmental protection.

3.3 Containment Dikes

As noted, the diesel tanks, the generation tanks and the AV fuel tanks are located inside containment areas. The containment appears to be in good condition. Containment for the electrical equipment, consisting of additional gravel or concrete dikes, will be installed.

3.4 Emergency and Spill Containment Equipment

A summary of emergency equipment is listed in Table 3 of Appendix B. Specific items of emergency equipment are discussed in the following paragraphs.

Absorbent materials are stored just inside the bay door of the Generation Facility for use in containing liquids from a release. A special curb block and oil absorbent sock will be placed along the nearby curb opening during all fuel or back-up tank transfer activity.

The University of Mississippi maintains a close relationship with local fire services officials. Municipal fire services will be called upon for fire scenarios. Type A, B, C portable fire extinguishers are kept locally as needed.

First-aid supplies and equipment are stored in the Health and Safety Office as needed. A list of first-aid supplies is found in Table 3 of Appendix B.

Safety glasses and chemical resistant gloves are also available at the Health and Safety Office for use, as needed, during an emergency.

The fuel port utilized for the filling of the generation AST's is equipped with an overflow container, to contain any drips of spills that may occur at the connection point.

The four generation facility transformers are contained in a concrete basin, which is equipped with two drains. These drains lead to the roof drainage system and are equipped with oil-stop valves. In the event of an oil spill from the transformers, the oil-stop valves would close and a manual valve would be opened to drain the oil into the 5,000-gallon back-up tank.

3.5 Facility Drainage

The Electrical Generation Facility and the Rebel Substation are not located adjacent to lakes, ponds, rivers or streams. Should a release occur from the generation facility, it most likely would be contained within the double wall tank or back-up

UST system on the property. Surface drainage slopes to a curb opening on the west side of the facility road along the west side of the building and towards a grassy hill on the east side of the building. A release would be prevented from leaving from this curb opening by the use of a curb block. A release from the substation would be held within the gravel cover until inspectors arrive.

The area around the 40,000 gallon diesel tanks has a slight slope to the south. Any release from these tanks that escapes the containment would flow along the road into a drainage ditch south of the tanks.

The fuel storage area at the airport is set at the top of a hill. Drainage flows towards the east, down the slope to the bottom of the hill. This area eventually drains into Davidson Creek.

The North Substation slopes towards Student Union Drive. Drainage flows along the grassy slope towards a storm drain along the street.

The South Substation slopes towards Fraternity Row. A concrete drainage ditch directs flow into a storm drain along the street.

3.6 Security

The University campus is patrolled 24 hours a day. The tank areas for the generation facility and the 40,000 gallon diesel tanks are not fenced off but, the tank system is monitored continuously and any alarm condition will be observed 24 hours a day. All valves for tanks not located within fencing (generation tanks and diesel tanks) have locks on all valves preventing unauthorized access and tampering. Campus security or facility personnel will be alerted during an alarm condition. These conditions include tank overflows, filling activity in the back-up UST or pump shut downs that may occur during due to line, valve or tank leaks. Access is limited when personnel are not present at the site. Adequate lighting exists around the generation facility.

The airport fuel storage area and truck parking area is fenced in with adequate lighting. The area is patrolled by Oxford Police Department. Any vandalism would be detected by the police or by airport employees.

The substations are all fenced in with adequate lighting to detect a spill.

3.7 Training

All facility employees, emergency coordinators, and fueling contractors will be instructed in the implementation of the SPCC Plan in the event of an emergency; operation and maintenance of equipment to prevent spills or releases; and applicable pollution control laws, rules and regulations.

The training will be provided in-house by the University of Mississippi and will insure that each employee requiring training has a thorough understanding of the following:

- The hazards involved with petroleum products
- · Cleanup procedures for oil or fuel spill cleanup
- · Reporting procedures for an oil spill

All training will be documented by the University of Mississippi and the training records will be maintained.

The primary Emergency Coordinator listed in Table 1 of Appendix B is the designated person responsible for oil spill prevention. The coordinator will schedule and oversee spill prevention briefings for operating personnel. Such briefings will highlight and describe known spill events or failures, malfunctioning components, potential areas of concern, recently developed precautionary measures and required employee response actions in accordance with this SPCC Plan.

All employee training will be documented in the employee personnel files. These records will be a permanent part of the file. Management will periodically review these records to insure that each employee has received the proper training.

3.8 Inspection and Spill Report Records

A SPCC Plan Monthly Checklist must be completed by the Emergency Coordinator or his alternate. A copy of the Monthly Checklist is found in Appendix D.

Should a spill occur, a Spill Report must be completed by the Emergency Coordinator or his alternate. A copy of a Spill Report is found in Appendix D.

All records must be maintained for three (3) years.

4.0 CONTINGENCY PLAN

The University has developed the following plan to be implemented in emergency situations. Each employee associated with the facility's handling of petroleum products will be familiarized with this plan and this training will be recorded and documented. The University is accessible to fire fighting and emergency vehicles and equipment. Local fire departments and emergency response units are familiar with the materials used at the University and the hazards associated with these materials. A copy of this plan will be submitted to the local authorities.

4.1 Hazards Associated with Materials Used and Stored at the Facility

Petroleum products at the University include AV fuel, diesel, gasoline, and transformer oil. The MSDSs for the petroleum products are available in Appendix E. All products are flammable and emit noxious vapors. Ensure that the area of the release is well ventilated and that no ignition sources are in the area. If the material comes in contact with skin or eyes, wash the affected area immediately. If personnel become dizzy or nauseated, move them into a well ventilated area.

4.2 Control Procedures for Potential Hazards

The following sections address areas of potential concern and the measures that should be taken to contain and minimize the hazards associated with emergency situations including fire, explosion and/or release of stored materials.

4.2.1 Fire and/or Explosion

Emergency response to contain a fire is essential; foam should be the primary extinguishing media. The use of water or water/chemical fire suppressants could generate contaminated run-off and spread the fire because many fuels and combustible chemicals have a specific gravity less than that of water. The hazards listed below could be minimized by efficient containment of a fire.

- Spreading of a fire could possibly ignite petroleum products and/or result in heat-induced explosions at other locations either on- or off-site.
- Spreading of fire could possibly ignite off-site facilities.
- Explosions could present imminent dangers associated with flying, burning materials and/or shock waves.
- Explosions could possibly result in the release of additional petroleum products.

In the event of a small, localized fire, an employee in the immediate area will promptly alert the Emergency Coordinator. Type A, B, C extinguishers are located throughout the campus.

The Emergency Coordinator will notify the local emergency management organization, 911, and the Oxford Fire Department. Employees in the vicinity of the fire will be evacuated in necessary. Any injured persons will be removed, and medical treatment will be administered by qualified personnel having advanced first aid training. Should additional assistance be required, the local hospital or a local emergency medical service will be called upon to assist.

If the Emergency Coordinator determines the incident to lie within the University's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary personnel. If the incident is beyond facility capabilities, the Emergency Coordinator will contact the appropriate agencies to request assistance. See Table 5 in Appendix B for a list of agencies and emergency telephone numbers.

Should facility operations stop because of an emergency, the Emergency Coordinator or his designate will visually, or with other means at his disposal, monitor for leaks, pressure build-up, gas generation or ruptures in valves, pipes, tanks or other equipment.

When the fire has been extinguished and the safety of personnel is no longer threatened, an "all clear" signal will be given by the Emergency Coordinator. Facility operations will not resume until all equipment and systems are checked and found to be working properly.

4.2.2 Release of Petroleum Products

Any container of petroleum products that is found to be leaking, rusted or damaged to the extent that a leak is likely, will be taken out of service and the contents will be transferred to another container which is in good condition. Containment of petroleum products is essential in minimizing the impact to the environment and human health. The following hazards are associated with the release of materials stored at the facility:

- A release poses a threat of fire or explosion.
- A release could result in the emission of noxious vapors.
- A release has the potential to contaminate navigable waters, surface water and/or ground water.
- A release not contained at the site could result in off-site contamination of soils, surfaces or ground water.

In the event of a small, localized release of petroleum products, a University employee in the area will immediately contain the release using absorbent materials for collection and disposal. Upon discovery of a release, every appropriate measure will be taken to stop the release at its source.

If a release occurs, the Emergency Coordinator will be notified. He will assess the extent or risk of surface and water contamination to determine if a hazardous situation exists. Those assisting the Emergency Coordinator will isolate the area of concern.

Because fire and/or noxious vapors are always a potential hazard in spills or releases of petroleum products, possible sources of ignition will be eliminated

by the person who discovers the spill or release after notification of the Emergency Coordinator or his designate. Vehicular traffic and work in the area will cease until the spill is contained and safe conditions are restored. Personnel overcome by vapors will be moved to a location where fresh air is available and qualified personnel who have advanced first aid training will administer medical treatment. Should additional assistance be required, a local hospital or emergency medical service will be called upon to assist.

If the release is determined to lie within the University's emergency response capabilities, the Emergency Coordinator will contact and deploy the necessary personnel. If the accident is beyond facility capabilities, the Emergency Coordinator will contact the appropriate agencies to request assistance. A list of agencies and telephone numbers can be found in Table 5 of Appendix B.

4.3 Emergency Response Procedures

4.3.1 Notification

In the event of an emergency, one or more of the Emergency Coordinators listed in Table 1 of Appendix B will be notified. The Emergency Coordinator will also notify the appropriate contingency response agencies if their help is needed. Emergency Contacts and respective telephone numbers are listed in Table 5 of Appendix B. Local fire departments and emergency services workers are familiar with the materials stored at the University. If outside contractors are necessary for emergency services or for clean up, they will be contacted by the Emergency Coordinator.

4.3.2 Assessment

The Emergency Coordinator will assess possible hazards to human health and/or the environment associated with the emergency incident. Site observations combined with knowledge of the materials stored at the facility, volumes of materials present, and the hazardous nature of these materials will be essential in assessing the situation. Assessment of the situation will also be influenced by available control measures and availability of emergency equipment.

If the Emergency Coordinator determines that the incident could be harmful to personnel in any area at the facility or in the surrounding area, he may order an evacuation of the affected area(s). Personnel will not return to affected area(s) until so authorized by the Emergency Coordinator.

4.3.3 Evacuation Plan

The University of Mississippi does not anticipate the occurrence of an emergency connected with the storage of petroleum products that would require extensive evacuation. Only facility personnel would need to be evacuated during a serious incident.

4.4 Post-Emergency Management

4.4.1 Prevention of Recurrence

Following an emergency situation, the Emergency Coordinator will take all responsible precautions to prevent recurrence of the incident. Operations will not resume until all equipment and systems are checked and found to be working properly. The actions listed below are to be performed by the Emergency Coordinator or his designate.

- Investigate the cause of the emergency incident and prepare a formal report as soon as possible.
- Ensure that proper decontamination, clean-up and restoration actions are carried out as soon as practicable (a record of all such actions performed should be maintained for future reference).
- Ensure that equipment repaired or replaced as a result of an incident is re-certified, as necessary, prior to being placed in-service.
- Inform employees of the sequence of events that lead to the event and discuss methods to prevent future occurrence.
- The SPCC will be reviewed and revised as necessary.

4.4.2 Storage and Treatment of Released Material

Immediately after an emergency, the Emergency Coordinator will verify that all released material is contained appropriately. Any impacted media (water, soil, adsorbent, etc) will be contained and appropriately stored for disposal.

4.4.3 Equipment Maintenance

After an emergency event, any emergency equipment used will be cleaned so as to be fit for reuse and/or replaced as appropriate. The Emergency Coordinator will inspect cleaned and/or replacement equipment and certify its fitness for its intended use. All essential emergency equipment will be suitable for use prior to start up of plant operations.

5.0 SUBMISSION OF SPILL NOTIFICATION

In the event of an emergency incident, requiring implementation of this Plan, the Emergency

Coordinator or his designate will notify internal management, the Mississippi Department of Environmental Quality, and appropriate local authorities by telephone. Written confirmation will be submitted within 15 days to internal management, the previously mentioned local authorities and the EPA Region 4 Administrator.

The following information will be provided:

- Name, address and telephone number of the University;
- Name, address and telephone number of the Emergency Coordinator;
- Maximum storage or handling capacity at the University and normal daily throughput;
- Description of the are involved, including maps, flow diagrams and topographical maps;
- A complete copy of the Plan, with any amendments;
- Date, time, and type of incident;
- Extent of injuries;
- Identify the system or sub-system in which the failure occurred;
- Assessment of the actual or potential hazards to human health and/or the environment;
- Estimated quantity and disposition of recovered material;
- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Other information requested by the EPA Region 4 Administrator.

A release of petroleum products will be reported to the MDEQ as soon as possible after a release is discovered. MDEQ's number is (601) 961-5171; Mississippi Emergency Management Agency is 1-800-222-6362. An offsite spill or release will be reported to The National Response Center for Oil and Hazardous Material Spills at telephone number (800) 424-8802 within 24 hours.

Appendix A

Figures

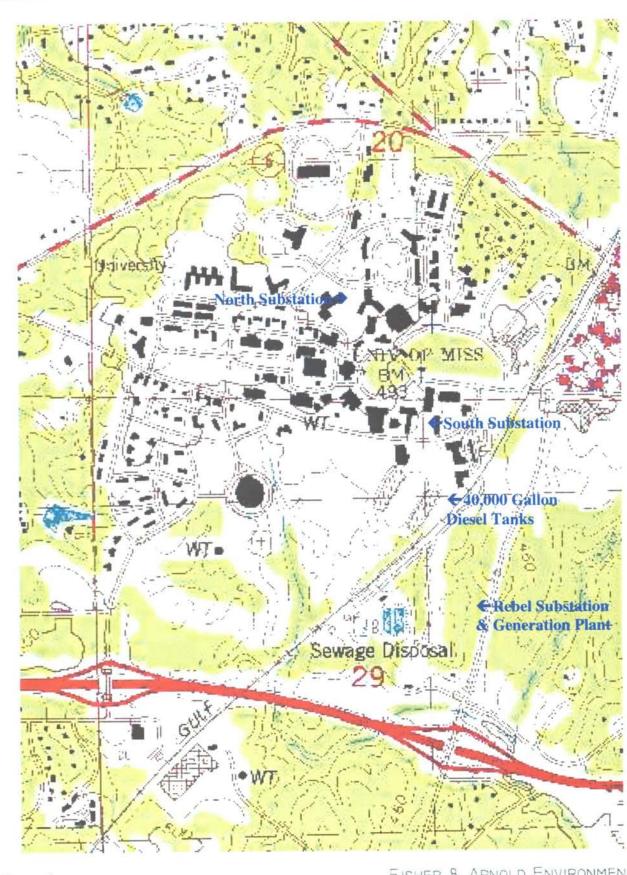


FIGURE:

TITLE: Campus Topographic Map

SPCC Plan JUBJECT:

University of Mississippi



FISHER & ARNOLD ENVIRONMENTAL Consulting Engineers A Division of Fisher & Arnold, Inc.

3205 PLAYERS CLUB PARKWAY MEMPHIS, TENNESSEE 38125 901-748-1811 FAX 901-748-3115

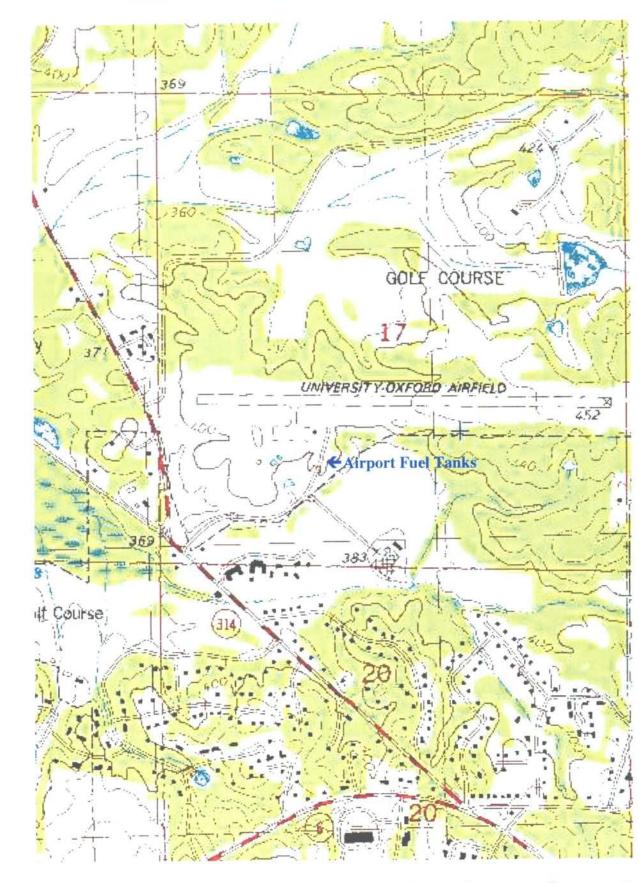


FIGURE:

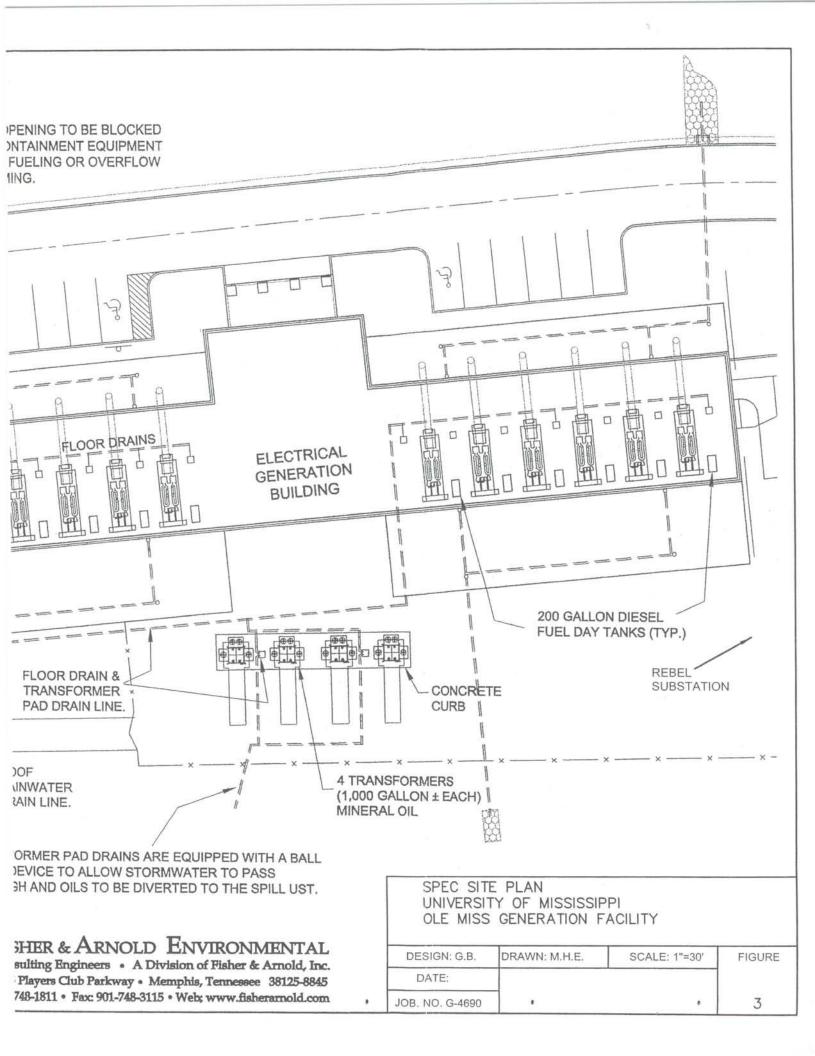
Airport Topographic Map TITLE:

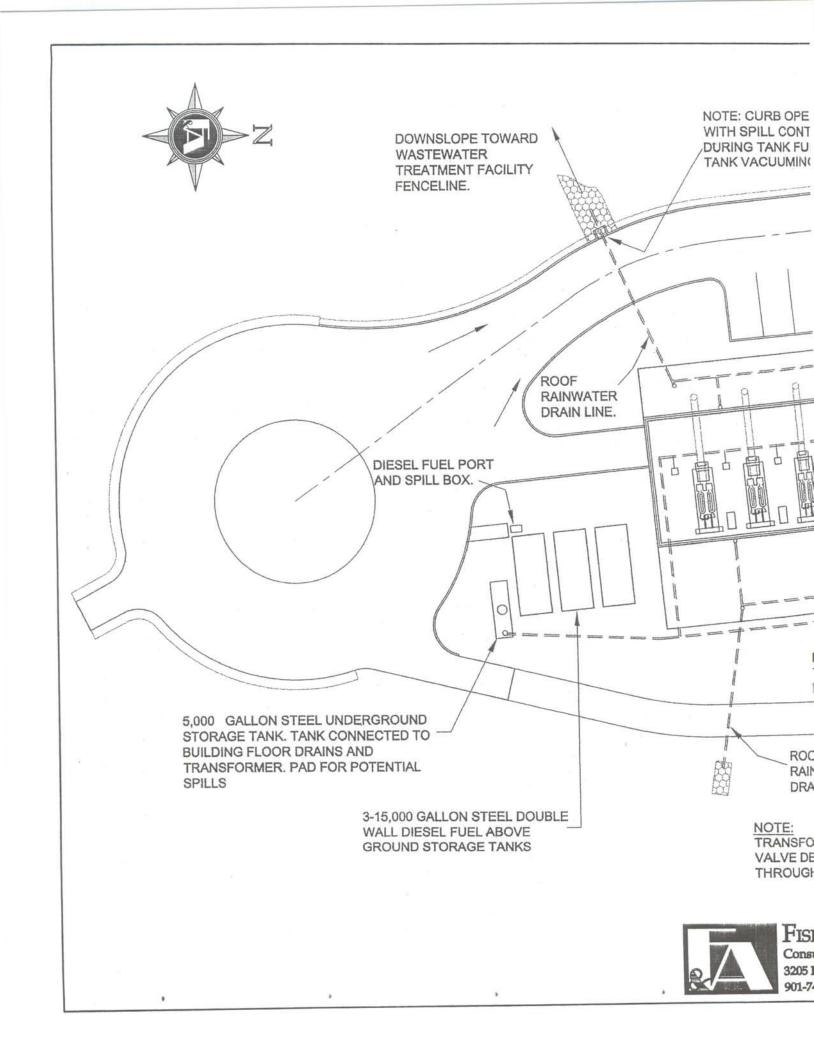
SPCC Plan SUBJECT:

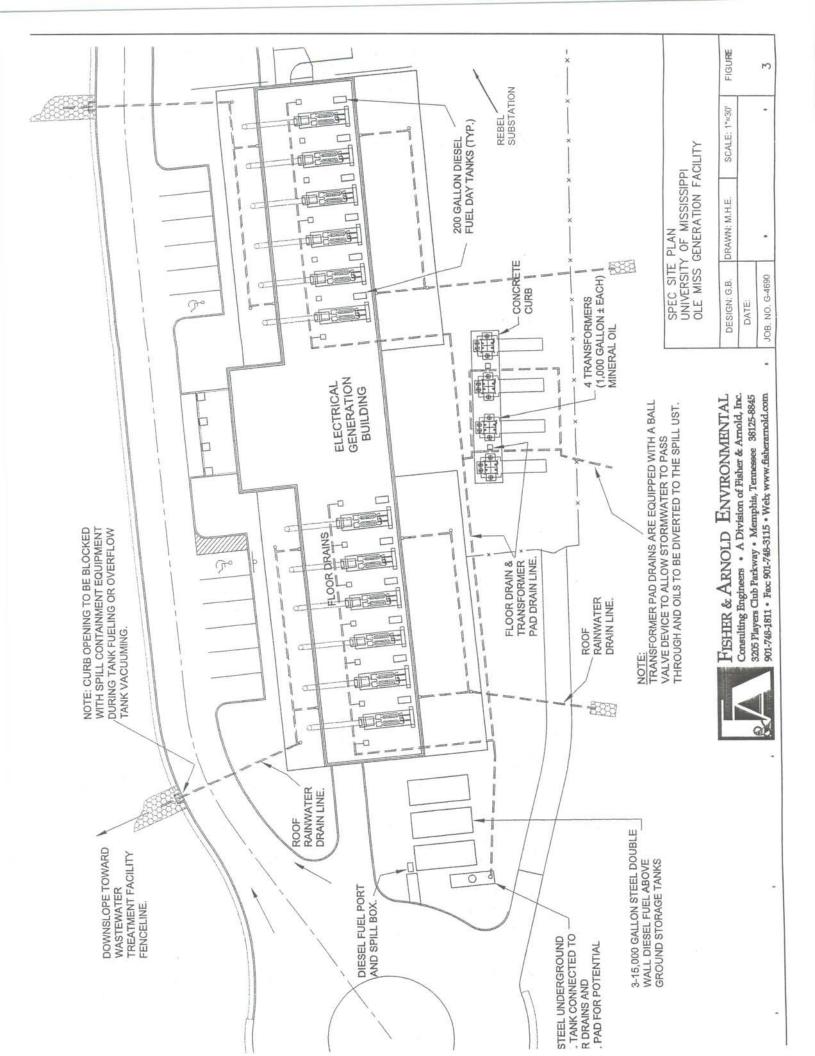
University of Mississippi

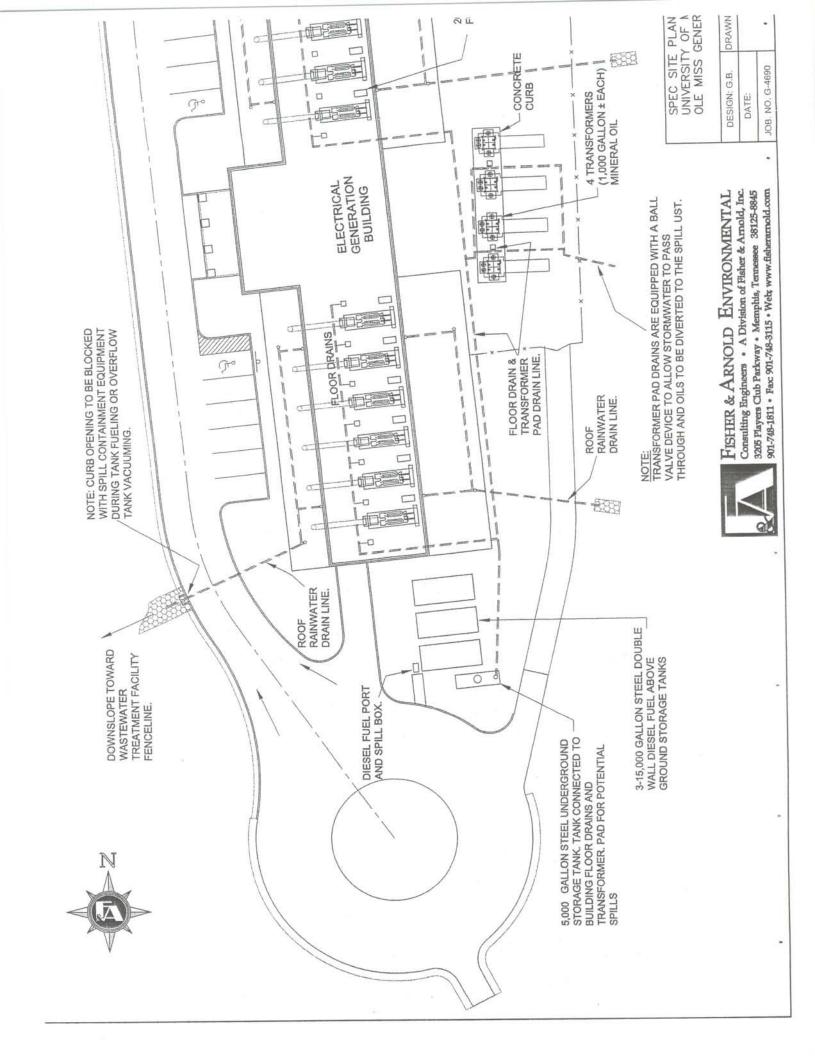


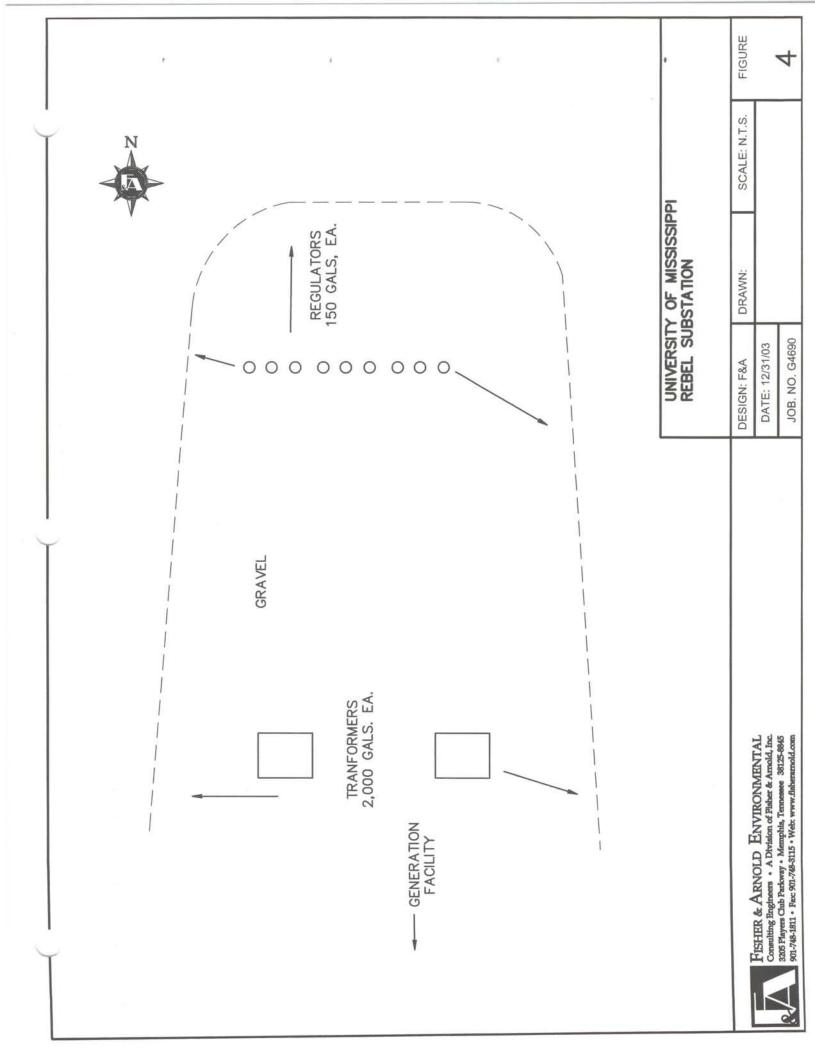
Consulting Engineers
A Division of Fisher & Arnold, Inc.
3205 PLAYERS CLUB PARKWAY
MEMPHIS. TENNESSEE 38125
901-748-1811 FAX 901-748-3115

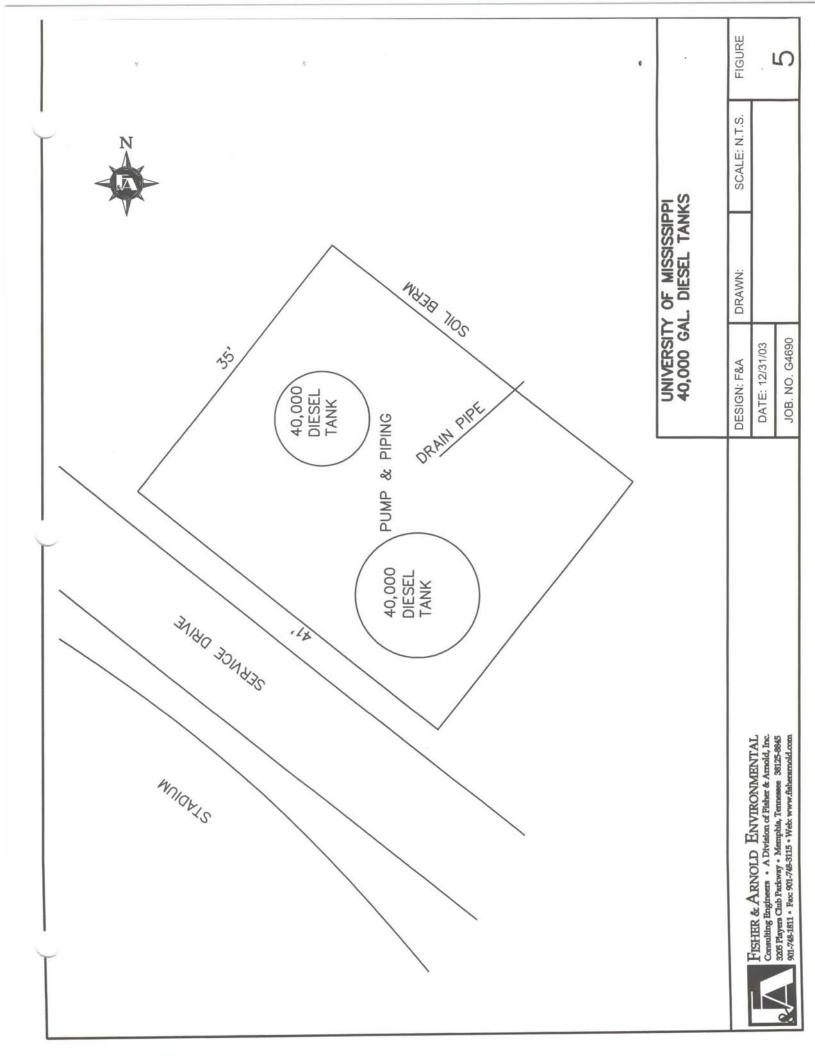


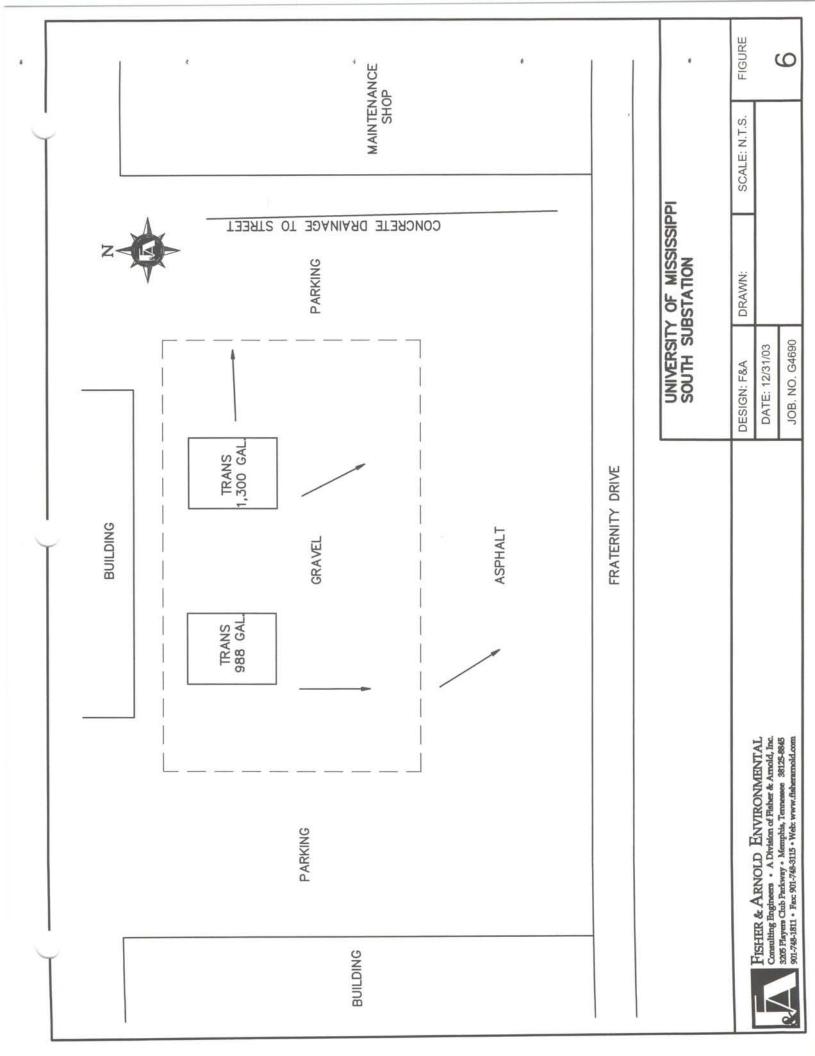


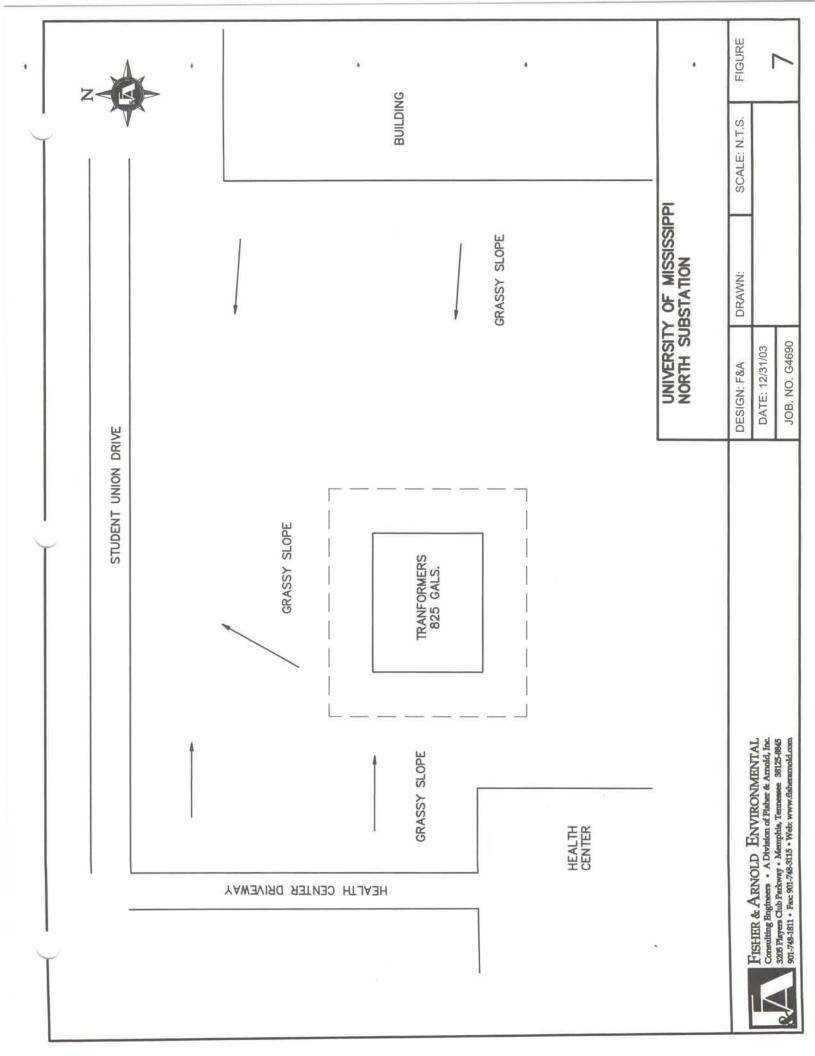


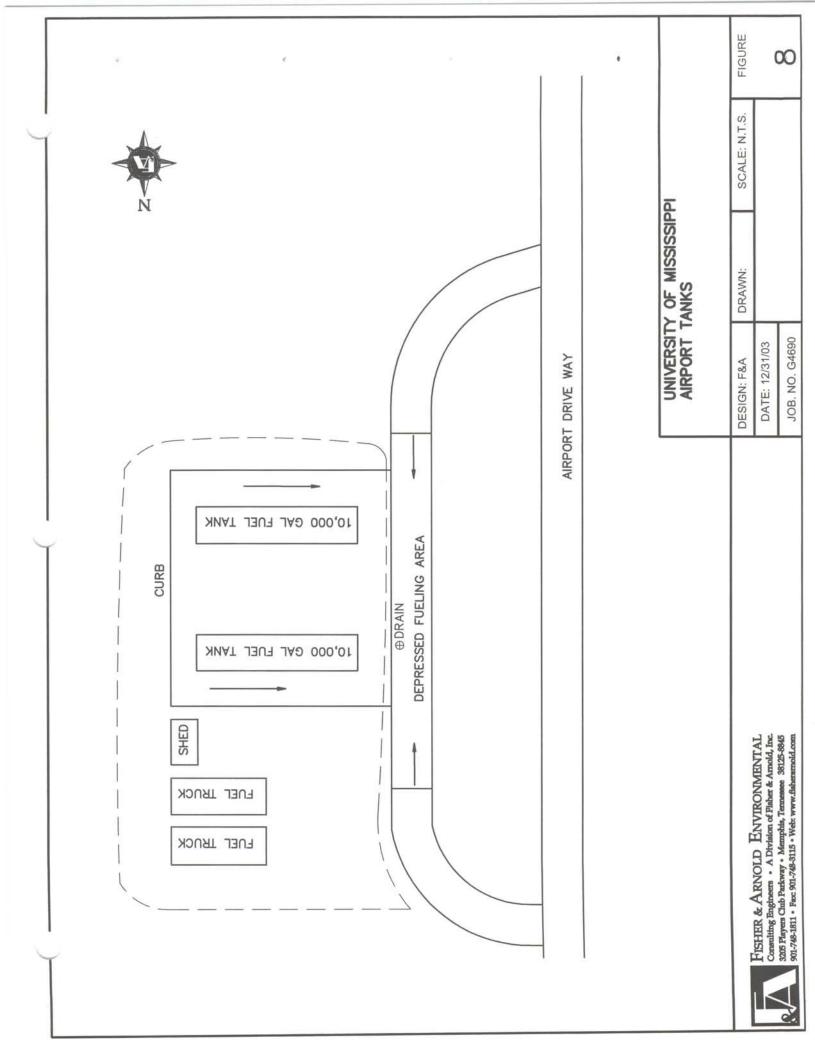












Appendix B

Tables

Emergency Coordinators

Emergency Coordinator	Name	Telephone Number
Primary	Edward Movitz Oxford, MS 38655	Work: (662) 915-5433 Home: (662) Cell: (662)
Secondary	Terron Jones University, MS 38677	Work: (662) 915-7051 Home: (662)
Additional	Dispatcher Old Power Plant University, MS 38677	Work: (662) 915-7087

Table 2 University of Mississippi

Emergency Equipment

Item	Comments
A,B,C Portable Fire Extinguishers	Mounted at the generation facility and by the fuel tanks. Mounted on the airport fuel trucks.
Fire Hydrants	Located throughout University.
First Aid Supplies	Located in Health and Safety Office and Health Center.
Protective Clothing	Safety glasses for use as needed; stored at the Health and Safety Office.
Absorbents / Curb Block	Socks and blocks located inside bay door in south side of building. Other absorbents inside the Health and Safety Office.
Shovels	Maintenance shops.

Table 3 University of Mississippi

First-Aid Supplies

Bandage Materials	Band Aids	
	Gauze Pads and Rolls	
	Adhesive Tape	
	Butterfly Bandages	
Antibacterial Ointments		
Local and Topical Anesthetics		
Aspirin		
Bloodborne Pathogens Control	Kit	

Table 4 University of Mississippi

Emergency Contacts

Emergency	Organization/Agency	Emergency Number
Injury	Dispatcher – PPD	Work: (662) 915-7087
Hospital	Baptist Memorial North Mississippi	Work: (662) 232-8100
	Ambulance Service	911
Fire/Explosions	Fire Department	911
Hazardous Waste Release	Health & Safety	(662) 915-5433
If Release Leaves Site	Mississippi Emergency Management Agency	1-800-222-6362
If Release Reaches Navigable Water	National Response Center	1-800-424-8802
	Mississippi Department of Environmental Quality	(8:00 a.m. – 5:00 p.m. only): (601) 961-5171

Appendix C

Certification of the Applicability of the Substantial Harm Criteria

Certification of the Applicability of the Substantial Harm Criteria

Facility Name: University of Mississippi				
Facil	lity Address: University, MS			
Crite	eria	Yes	No	
1.	Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?		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 area?		X	
3.	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?		X	
4.	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?		Х	
5.	Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?		Х	

Certification

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

4	
Signature	
Ed Movitz	
Name (please type or print)	
Health and Safety Officer	
Title	

Appendix D

Records of Inspection SPCC Plan Monthly Checklist Spill Report

SPCC Plan Monthly Checklist

Location:					
Date:	Inspector:				
1	Answer Yes or No to the questions listed below. If a question is answered "NO," then explain in the comments section of the form.				
		Yes	No		
1.	Oil filled equipment is in good shape? No signs of leaks or deterioration to the equipment. Bulk storage tanks inspected and in good shape?				
2.	Service equipment clean, well-maintained, and labeled?				
3.	Fire fighting equipment in good working condition? Extinguishers charged?				
4.	Are security measures in working order?				
5.	Are spill kits/equipment/first aid kits in good condition and fully stocked?				
Comments:					

Containment Drainage Log

This log is to be used any time a containment area is emptied of storm water. The water within the containment must be inspected for signs of contamination before the water can be drained. If signs of contamination are visible, do not release the water until the source is identified and the contamination is removed.

Date	Containment	Amount of Water in	Signs of Contamination	Inspectors
	Inspected	Containment	(sheen, discoloration, etc)	Initials
	-			

Spill Report

Location:					
Time Reported:					
Clean Up Completed:					
Persons Taking Part in Cleanup:					
Vehicles and Equipment Used:					
Amount of Material Released:					
Type of Material Released:					
Cause of Spill:					
Corrective Action Taken to Prevent the Release:					
Comments:					

Employee Training Log

Training Topic	Personnel Providing Training	Date of Training	Attendees
Spill Prevention and Response			

Appendix E

Material Safety Data Sheets