

Spill Prevention Control and Countermeasure Plan

Trinity College
300 Summit Street
Hartford, CT 06106

Current Review and Amendment Prepared by:
Triumvirate Environmental, Inc.
Current Revision Date – September 2020

Supersedes Review and Update Prepared by:
Aramark
Previous Revision Date – March 2018

Original Plan Prepared by:
Trinity College
Original Plan Dated – June 2000

**TRINITY COLLEGE
 SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
 (40 CFR Part 112)**

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1.0 INTRODUCTION AND PLAN CERTIFICATION

1.3 Introduction

As required by the Clean Water Act, the United States Environmental Protection Agency (USEPA) established Oil Pollution Prevention Regulations, which are codified in 40 CFR Part 112. 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 (U.S.) 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 gasoline, and other activities, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon navigable waters of the U.S.

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 above-ground storage capacity of the facility is 1,320 gallons or greater of oil.

Trinity College is subject to these regulations based upon the quantities of oils stored aboveground at their facility.

The College's main address is: 300 Summit St, Hartford, CT 06106

As depicted in the site maps (Appendix A; Figures A-1 and A-2), Trinity's campus is set out on a 100-acre (40 ha) parcel of land that is bound on the south by New Britain Avenue, on the west by Summit Street, on the east by Broad Street, and on the north by Allen Place. The campus is located within the city limits of Hartford, CT and is surrounded by a variety of residential and commercial properties.

The South Brook Park River is located to the west of the campus at a distance of approximately 0.5 miles from the northwest boundary and approximately 1 mile from the southwest boundary. The Connecticut River is located approximately 1.5 miles to the east of the Trinity campus.

Trinity College has approximately 6,900 gallons of oil storage capacity in containers, equipment or above-ground storage tanks (ASTs). Trinity College, is therefore, subject to the federal regulation 40 CFR Part 112. This Oil Spill Prevention, Control and Countermeasure (SPCC) Plan has been developed in accordance with the requirements of 40 CFR Part 112. A copy of this plan is maintained on-file in the office of the EHS Manager.

1.2 SPCC Plan Self-Certification (§112.6(a)(1))

Since Trinity College's current inventory of oil is below 10,000-gallon threshold and the facility has not had a release of oil exceeding 1,000 gallons or no more than two releases of 42 gallons or more in the past three years, the Site meets the criteria to self-certify this update to the Oil SPCC Plan in-lieu of certification by a Professional Engineer.

Certification

I, [Kyle Coughlin], attest that I have reviewed the Trinity College Oil SPCC Plan and certify that:

1. I am familiar with the applicable requirements of 40 CFR part 112;
2. I have visited and examined the facility;
3. This Plan was prepared in accordance with accepted and sound industry practices and standards;
4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices;
5. I will fully implement the Plan;
6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
 - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping;
8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I, [Kyle Coughlin], attest that I have reviewed the Trinity College 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) have visited and examined the facilities 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 and is being fully implemented.

Signature:  EHS Manager
[NAME], [TITLE]

Date: 12-16-2020

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 1000 gallons of oil in a single discharge, or
- 2) If more that 42 gallons of oil are discharged in each of two discharges occurring within any 12-month period.

If either of these two events occurs, Trinity College 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 U.S.” 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.

Amendments to the plan will be prepared within six months and implemented as soon as possible, but not later than six months following plan amendment.

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. Trinity College will amend the Oil SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) if such technology has been field-proven at the time of the review, and (2) if such technology will significantly reduce the likelihood of a spill event from the facility.

A review, revision/amendment, and certification history of this SPCC Plan is detailed in Table 1 below.

Table 1: SPCC Plan History

ACTION TYPE	DATE	COMPLETED BY	CERTIFIED BY	NOTES
Initial Plan Issue	June 2000	Trinity College	Robert M. Sullivan, P.E.	
Review and Amendment	September 2003	GZA GeoEnvironmental, Inc.	Robert M. Sullivan, P.E.	<ul style="list-style-type: none"> • Updates to oil storage facilities/ equipment. • Updates to SPCC personnel.
Review and Amendment	September 2008	GZA GeoEnvironmental, Inc.	James J. Clark, P.E.	<ul style="list-style-type: none"> • Revisions to align with amendments to 40 CFR Part 112. • Updates to oil storage facilities/ equipment. • Updates to SPCC personnel.
Review and Amendment	September 2013	GZA GeoEnvironmental, Inc.	James J. Clark, P.E.	<ul style="list-style-type: none"> • Updates to oil storage facilities/ equipment. • Updates to SPCC personnel.
Review and Amendment	March 2018	Aramark	Joseph Laliberte	Review consisted of handwritten updates of printed version of 2013 plan, which included changes to oil storage facilities/ equipment and updates to SPCC personnel.
Review and Amendment	September 2020	Triumvirate Environmental, Inc.	Kyle Coughlin	<ul style="list-style-type: none"> • Updates to oil storage facilities/ equipment. • Updates to SPCC

				personnel. • Incorporate self-certification of the SPCC plan.
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1.4 Conformance with Regulatory Requirements (§112.7(a)(2))

Trinity College has developed this Oil SPCC Plan in accordance with the requirements of 40 CFR Part 112. As allowed by this 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)

Trinity College 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 Countermeasure Plan.

Authorized Facility Representative:

Signature:  Director of facilities
 [NAME], [TITLE]

Date: 12-16-20

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

2.1 Facility Information

Name of Facility: Trinity College
Type of Facility: Private Liberal Arts College
Location of Facility: Hartford, CT 06106

Name and address of owner or operator:

The Trustees of Trinity College
Joanne Berger-Sweeney, President
300 Summit St, Hartford, CT 06106

Designated person accountable for oil spill prevention at the facility:

Name	Title	Office Phone Number	Cell Phone Number
Kyle Coughlin	EHS Manager	860-297-4250	860-754-7137

Alternate person accountable for oil spill prevention at the facility:

Name	Title	Office Phone Number	Cell Phone Number
Astor Pagan	Director of Facilities	203-313-7827	203-313-7827

3.0 SPCC PLAN OVERVIEW (§112.7(a)(3))

3.1 Facility Description

Trinity College is a small, independent liberal arts college located on approximately 100 acres of land in Hartford, CT. There are currently about 2,300 students and faculty. The majority of students live on campus, while several faculty members also live on campus in apartments, single-family housing, or in dormitories. The campus has approximately 95 buildings, 44 of which are used for housing (e.g. student housing or rental properties). The majority of buildings are heated by the central energy plant, which is fueled by natural gas. Public water and sanitary sewage service is provided by the Metropolitan District Commission.

3.2 Oil Storage

The site plan presented in Appendix A identifies the location of these facilities on the property.

Types of Oils Stored and Storage Volumes

The table below identifies the types of oils and oil products used at Trinity College and their approximate total volumes. Aboveground storage totals include All oil types and size tanks and containers with a capacity of 55 gallons or greater.

Product	Aboveground Storage (gallons)	Underground Storage (gallons)
Transformer Oil	2,799	0
Electrical Switch Oil	236	0
Diesel Fuel	330	0
Lubricant Oil	275	0
Hydraulic Oil	2,650	0
Cooking Oil/Grease	355	0
Waste Oil	275	0
Total	6,920	0

Oil is stored at a variety of locations on-site. Oil storage locations, tank/container sizes, and the predicted flow rate and direction of any releases are presented in Appendix B. All procedures and equipment are fully operational.

The total volume stored is below the threshold for a Facility Response Plan as documented in the Applicability of Substantial Harm Criteria, Appendix C.

3.3 Policies on Oil Storage, Spill Prevention, and Spill Containment (§112.7(a)(3)(i-v))

Trinity College has instituted policies for proper oil storage, mitigation of the impact of any spills, and spill response for the facility. To achieve Trinity's primary goal to prevent the occurrence of spills at the facility, specific procedures have been developed and implemented.

Trinity College 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, Trinity'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 Trinity College.

3.3.1 Container and Drum Storage

The general strategy for preventing releases is to handle containers and drums properly, and, where needed, to contain a spill in the general area where the material is stored. The following policies and practices have been instituted:

- Drums of oil are properly labeled and stored upright on spill-containing pallets.
- Containers of oil are to be properly handled and transported by trained personnel.
- Oil storage containers equal to or greater than 55-gallons storage capacity are stored with secondary containment (or are otherwise contained), so as to provide at least 100% containment of the largest container volume in case of a leak or rupture.
- Spill equipment (absorbent material, spill containment equipment) is maintained at oil storage and loading/unloading/transfer areas throughout the facility.

Spill prevention measures taken by Trinity College 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 in all areas where applicable. Details of secondary containment inspection and spill prevention equipment and materials are included in Appendix B of this document.

3.3.2 Aboveground Tanks and Containers

A list of aboveground oil storage tanks/containers located throughout the facility which includes oil-filled equipment and 55-gallon drums, their contents and locations is included in Appendix B of this plan.

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

- In rooms or outdoor areas with existing storage tanks near open floor or storm drains, or sensitive receptors, the drains are permanently plugged, capped or covered, if possible; or 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.
- The EHS Department conducts documented inspections all tanks and container storage on a monthly basis. Oil-containing operational equipment are conducted on quarterly-to-annual frequencies. The EHS Manager reviews and maintains all completed inspection logs (See Appendix D), which are kept in the EHS Office.

3.3.2 Underground Storage Tanks

As of 05 June 2018, Trinity College no longer has any underground storage tanks (USTs) on-campus. All USTs have been properly removed, with confirmed clean closure of the tanks and associated piping.

3.3.4 Qualified Oil-Filled Operational Equipment

Oil containing equipment on campus includes electrical transformers, elevators, and oil-filled electrical switches.

3.3.5 Elevator Hydraulic Oil reservoir

Trinity College will use routine equipment inspections for spill detection and control to monitor the hydraulic oil in the single elevator at the facility. Elevator tank inspections are performed by outside contractors and kept on file. Spill kits are near in the event of a spill. A list of oil-filled operational equipment and their contents and locations is included in Appendix B of this plan.

3.3.6 Oil-Filled Electrical Transformers

Trinity College has oil-filled primary power transformers located at various outdoor locations across campus (see Appendices A and B). The transformers are installed on concrete pads and are designed for outdoor use. All outdoor transformers are secured in locked, weatherproof structures. In addition, transformers are generally located in grassy areas and are protected from accidental collision either by layout of surrounding buildings/facility infrastructure (e.g. curbing) or by bollards.

3.3.7 Oil-Filled Electrical Switches

There are oil-filled electrical switchgear at three locations within the campus, which are identified and described in Appendix B. These are located in indoor, secured locations.

3.3.8 Oil-Water Separator

Wastewater generated from the garage floor washdown, incidental drippage from vehicles and handwashing of vehicles as part of normal servicing operations are discharged to a floor drain which connects to a 1000-gallon concrete oil/water separator tank. The tank is located under the slab floor via a manhole at the south end of the building. The discharge overflows through a grit separator to the sewer system under the Connecticut General Permit for the Discharge of Misc. Wastewaters. Sludge from the sediment tank is pumped and the tank cleaned out twice a year.

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/container location.

5.0 FACILITY DRAINAGE (§ 112.8(b))

5.1 Drainage Systems

When practicable, Trinity College makes every effort to store and handle oil in contained areas or within secondary containment. Oil is stored in various locations on the Trinity College Campus. Floor drains near any oil tanks or containers will either be (or are currently) plugged or located outside of secondary containment.

Aboveground storage tanks are situated on concrete or asphalt surfaces or within buildings. No areas are diked to collect storm water. However, any leak will be cleaned up promptly to prevent oil from reaching a surface water.

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 the Trinity College Campus are provided in Appendix B. There are aboveground storage tanks or containers located in various locations throughout campus. Absorbent materials are stored in close proximity of containers and additional materials are stored in the Facilities Department.

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

Aboveground storage tanks are steel and other materials 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 Bulk Storage containers at Trinity College are equipped with sufficient secondary containment in accordance with 40 CFR 112.8(c)(2). The types of secondary containment for all ASTs are listed in Appendix B.

Oil delivery contractors are expected to perform fuel deliveries in compliance with U.S. Department of Transportation (DOT) regulations. Delivery contractors are expected to maintain 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 Trinity College.

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 aboveground oil storage tanks/containers on a regular schedule. Each of the aboveground storage tanks at Trinity College have been assessed to determine the most appropriate integrity testing methods.

In order to comply with this requirement Trinity College is adhering to the provisions of the Steel Tank Institute Standard SP001 which is titled "Inspection of Above-ground 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.

Trinity College only stores oil above ground in containers ranging in size from 55-gallon drums to various types of small tanks (i.e. 100 to 330-gallon capacity tanks). Because these tanks are all less than 1100 gallons and do not fall under "Category 3" tank specifications which are specific to aboveground storage tanks without spill control and without continuous release detection monitoring, therefore non-destructive shell testing is not applicable in accordance with the STI Standard SP001 standard. 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 and no formal shell integrity testing is required. Furthermore, in accordance with clarification provided by U.S. EPA Region I, U.S. Department of Transportation (DOT approved 55gallon drums in good condition are not subject to integrity testing as they are already in conformance with required industry standards.

Accordingly, Trinity College 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.

Small Storage Tanks (100 to 1,100 Gallon Capacity)

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

- Presence of Continuous Release Detection Method (CRDM)
- Presence of Spill Control
- Tank Size
- Tank Type

A summary of the evaluation is presented in Appendix C.

All of the Bulk Storage tanks at this facility have been assigned to “Category 1” or “Category 2” in accordance with STI Standard SP001 and are shop-fabricated ASTs. The inspection schedule suggested for “Category 1” and “Category 2” shop-fabricated tanks that are less than 1100 gallons is periodic visual inspection. Based on this industry standard, the inspection provision of this SPCC plan, section 9.0, will be implemented as equivalent environmental protection to the standards in §112.8(c)(6).

This information will be included in the annual SPCC training Trinity College provides to all their oil handling personnel.

Oil-filled operational equipment such as the hydraulic elevator reservoirs, electrical transformers, etc. have not been included in this section because they are not subject to the SPCC integrity testing requirements of §112.8(c)(6). These standards are only applicable to bulk containers of oil.

6.5 Internal Heating Coils (112.8 (c)(7))

There are no tanks at Trinity College that contain internal heating coils.

6.6 Container Installations – Good Engineering Practices (§112.8(c)(8))

All aboveground tanks 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:

- Aboveground tanks have vent whistles, liquid level indicators, vent whistles and/or are observed during filling.
- Liquid levels within drums are observed while filling.

6.6 Wastewater Discharges (§ 112.8(c)(9))

Trinity College's sanitary wastewater is discharged via sewer to a publicly owned treatment works (POTW) under registration to the Connecticut *General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater* (Permit No. CTMIU0075). By implementing containment procedures, providing secondary containment within indoor oil storage areas, and/or by maintaining a readily available supply of absorbent materials in such areas, Trinity College minimizes the potential for oil spills to reach the sewer system, and therefore navigable water.

Additionally, wastewaters generated from the Building & Grounds Garage floor washdown, incidental drippage from vehicles and handwashing of vehicles as part of normal servicing operations are discharged to a floor drain which connects to a 1000-gallon concrete oil/water separator tank. The tank is located under the slab floor via a manhole at the south end of the building. The discharge overflows through a grit separator to the sewer system under the General Permit referenced above. Sludge from the sediment tank is pumped and the tank cleaned out twice a year.

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 the Facilities Department personnel.

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

Any/all mobile or portable oil storage containers used on campus are furnished with a secondary means of containment such as a dike or catchment basin to contain the capacity of the largest single compartment or container with sufficient freeboard for precipitation.

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

The principal transfer operations taking place at Trinity College involves the transfer of oil from delivery trucks to inside aboveground storage and from the containers to its point of use. In addition, Trinity transfers products from these containers on an as-needed basis.

7.1 Buried Piping (§ 112.8(d)(1))

Trinity College does not currently have any active buried piping associated with any oil product. If buried piping is installed in the future, it will be provided with a protective wrapping and coating as appropriate.

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

Trinity College no longer has any underground storage tanks (USTs) on-campus. All USTs have been properly removed, with confirmed clean closure of the tanks and any associated piping, which have either been removed or sealed in place.

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

There are no aboveground pipelines present on the Trinity College campus.

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

Tank truck unloading at Trinity College consists primarily of bulk deliveries of fuel to the aboveground diesel tank at the Building and Grounds Garage.

Tank truck loading consists primarily of pumping out the waste oil tank, which is also located at the Building and Grounds Garage.

Delivery contractors are required to follow Trinity College's established spill prevention guidelines and will be accompanied by Building and Grounds personnel.

A spill kit is readily available in the garage to respond to incidental spillage, should it occur.

8.1 Department of Transportation Regulations

An independent fuel delivery contractor, under contract with ABM/Trinity College, 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 Trinity College's oil delivery guidelines. These guidelines are communicated to contractors selected by ABM/Trinity College for fuel delivery service. ABM will periodically observe and evaluate the fuel deliveries.

Companies delivering fuel or other oil product to Trinity College must be trained and equipped to prevent and rapidly respond to spills that occur during delivery. Cleanup of spills occurring during delivery will be managed by Triumvirate Environmental personnel to ensure the thorough removal of oil and restoration of the affected area. Trinity College requires that the fuel delivery drivers notify the Trinity EH&S Manager in the event of a release.

The following is required action that fuel delivery contractor personnel must take during oil deliveries at Trinity College:

- Provide portable fire extinguisher (Class B or A-B-C) during delivery. The extinguisher must be capable of extinguishing Class B fires;
- Provide a positive means to prevent inadvertent fuel delivery line disconnect during fueling, this includes visually monitoring the connection at all times or utilizing other methods such as a light or signage indicating fueling "in process" a barrier indicating fueling in process, or other equally effective means;
- Cover storm drains in the area with liquid tight covers able to prevent an oil breach; and
- Observe the hoses, vehicle and nozzles following the beginning of the oil flow and periodically throughout the delivery process.

The following is required action that each ABM/Trinity employee monitoring diesel fuel deliveries must take during the delivery at Trinity College:

- Ensure adequate training in the operation of fire extinguishers for personnel assigned to monitor the fuel delivery;
- Verify tank level before and after delivery;
- Inspect the condition of the tank and surrounding areas to verify that no existing leaks or standing oil are present prior initiating the delivery and at delivery completion. If leaks or standing fuel (other liquids, etc.) are noted prior to the delivery, the delivery will not be permitted until the sources are identified and corrected;
- Observe the hoses, vehicle and nozzles following the beginning of the oil flow and periodically throughout the delivery process; and
- Facilities department representative must visually check the delivery truck for tank tightness prior to fuel off-loading. If fuel leakage is identified, the delivery will not be permitted to begin. If leaks are detected during fuel delivery, the fuel delivery must cease immediately (all personnel must notify the EH&S department immediately).

The following actions will be taken in the event of a fuel oil release during delivery:

- Cover storm water catch basin and floor drains in area with liquid tight covers able to prevent an oil breach;
- Surround fuel oil delivery hoses with oil absorbing materials (found in the spill kit); and
- Notify the EH&S Manager immediately.

These procedures shall be reviewed during all annual SPCC trainings for Trinity College oil handling personnel.

9.0 INSPECTIONS AND RECORDS (§112.7(e))

- Oil tanks (above-ground) and storage containers are subject to visual inspection monthly by the EH&S Department.
- Oil-containing equipment is inspected at quarterly-to-annual frequencies:
 - Electrical switches and transformers are visually inspected quarterly by the EH&S department.
 - Elevators are serviced and inspected annually by the designated service contractor (Kone).
- Oil container and equipment inspections performed by the EH&S department will be inspected monthly and the results documented on the inspection form in Appendix D.
- Elevator inspection documentation will be provided by the service provider and maintained on file by facilities.

Aboveground oil storage tanks, oil containers, and oil-containing equipment are visually inspected on a routine basis by the Facilities Department to determine if there any leaks, spills or other deficiencies. Deficiencies are reported to the EHS Manager or 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 EH&S Manager and/or designee. Inspection checklists are presented in Appendix D. All records are signed by the inspector, reviewed by EHS, and kept on file for three years. The Self-Inspection records are kept on file for five years. Spills, leaks and/ or other problems discovered are reported and promptly corrected. Incident records for spills are maintained by the EH&S Department. 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 the EHS and/or Facilities Department.

10.0 SECURITY (§112.7(g))

10.1 Campus Safety

The Trinity College Campus Safety provides security oversight for the campus. The Hartford Police Department provides emergency services twenty-four hours per day, seven days per week, and every day of the year. Campus Safety is located on Vernon Street. In an emergency situation (such as spills), Campus Safety can be reached by telephone as follows:

- (Emergency) 860-297-2222 (x2222 from any on-campus landline phone)
- (Routine) 860-297-3333

Campus Safety officers conduct routine walk-throughs of campus buildings and grounds and provide patrols twenty-four hours per day. Any oil leaks or spills discovered during a patrol are reported immediately to dispatch and initial containment measures will be taken (i.e. deployment of sorbent materials) while the appropriate notifications are made to the EH&S manager, Facilities Director, and the designated emergency spill response contractor (Triumvirate Environmental).

10.2 Fencing and Gates (§112.7(g)(1))

Trinity College does not have a perimeter fence around the property line with guarded or locked entry points. However, oil storage and oil-containing equipment are well-secured to prevent unauthorized access / tampering that could lead to a release or spill:

- Above-ground storage tanks and containers are located within several facilities around the campus. Each facility handling, processing, or storing oil is locked and/or secured when the facility is unattended.
- Oil-containing equipment, such as elevators and electrical switches are located inside of buildings and cannot be accessed without key card authorization.
- Oil-containing transformers are located in outdoor, unfenced locations. However, the cooling oil components are contained within a sealed and locked outer casing.

10.2 Flow Valves Starter Controls & Pipelines Loading/Unloading Connections (§112.7(g)(2) & (3))

All valves/equipment related to initiating the flow of oil are located within secured areas and are not accessible to unauthorized personnel.

10.3 Facilities Lighting (§112.7(g)(5))

Lighting provided in and around campus buildings and grounds is sufficient to provide for the detection of spills during hours of darkness and to deter acts of vandalism that could otherwise result in an oil spill.

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

Trinity College's training program, as described below, has been implemented as part of this SPCC Plan.

Trinity College 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 facility's Oil SPCC Plan.

Annual training 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.

Trinity College personnel responsible for overseeing and responding to oil spills on Campus are provided with appropriate hazardous materials spill response training and precautionary measures. Documentation of all such training will be maintained in the EHS & Facilities Department office files.

At Trinity College, Kyle Coughlin is the designated person accountable for oil spill prevention and who reports to the Facilities Director and College leadership team.

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 the Trinity College campus that has the potential to reach navigable waters of the U.S.

12.1 Immediate Response/Notification

Upon discovery of a spill or leak, 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 of U.S.

After taking initial containment measures, the person discovering the spill must call Kyle Coughlin or Astor Pagan and 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;
- 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.

Pursuant to the procedure in the SPCC plan, individuals are responsible for immediately contacting the EHS / facilities Department, The On-call coordinator contacts other appropriate response team members at Trinity College or a response contractor as necessary.

For spills that have reached or have the potential to reach a floor drain, catch basin or other vessel leading to any body of water, or another sensitive receptor, notification of the proper persons within Trinity College and the regulatory agencies must be made immediately.

The EHS Department is responsible for compliance notification. As soon as possible after the incident, the on-call must be contacted.

The EHS Manager or senior manager in charge contacts the 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.

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

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

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 below table contains a list of outside responders and agencies that may need to be notified of an oil spill to the environment.

Authority	Notify	Telephone
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Kyle Coughlin	Trinity College Primary SPCC Coordinator	860-754-7137
Astor Pagan	Trinity College Backup SPCC Coordinator	203 313-7827
Hartford Police, Fire, Medical	To Report a Fire, Medical Environmental Emergency	911
CT DEEP Oil and Chemical Spills Response Division	Environmental Emergency	860-424-3338 or toll free 1-866-DEP-SPIL (1-866-337-7745), 24 hours/day
National Response Center	Environmental Emergency	800-424-8802
US Environmental Protection Agency Regional Administrator (Region I)	Environmental Emergency	888-372-7341
The Metropolitan District (MDC) Command Center	Spill to Sewer	278-7850 & press 1 24 hours/day
Triumvirate Environmental	Oil Spill Clean-Up	800-966-9282
Environmental Services Incorporated	Spill Division	860-528-9500

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 EHS / Facilities Department 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 Regional Administrator of Region I within 60 days (40 CFR 112.4(a)):

1. Name of facility;
2. Name(s) of the owner or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures that were taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps as necessary;
7. The cause(s) of such discharge, including a failure analysis of system or subsystem in which the failure occurred;
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
9. Such other information as the Regional Administrator 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

The CT Department of Energy and Environmental Protection (DEEP) requires notification of oil releases "which poses a potential threat to human health or the environment" as detailed in Chapter 446k, Section 22a-450, of the Connecticut General Statutes.

The notification must be made immediately to the CT Department of Energy and Environmental Protection (DEEP), Emergency Response Unit, 860-424-3338 or toll free 1-866-DEP-SPIL (1-866-337-7745), 24 hours/day. Should these number become unavailable for any reason, call 860-424-3333.

Immediately after the spill you are required to report facts such as:

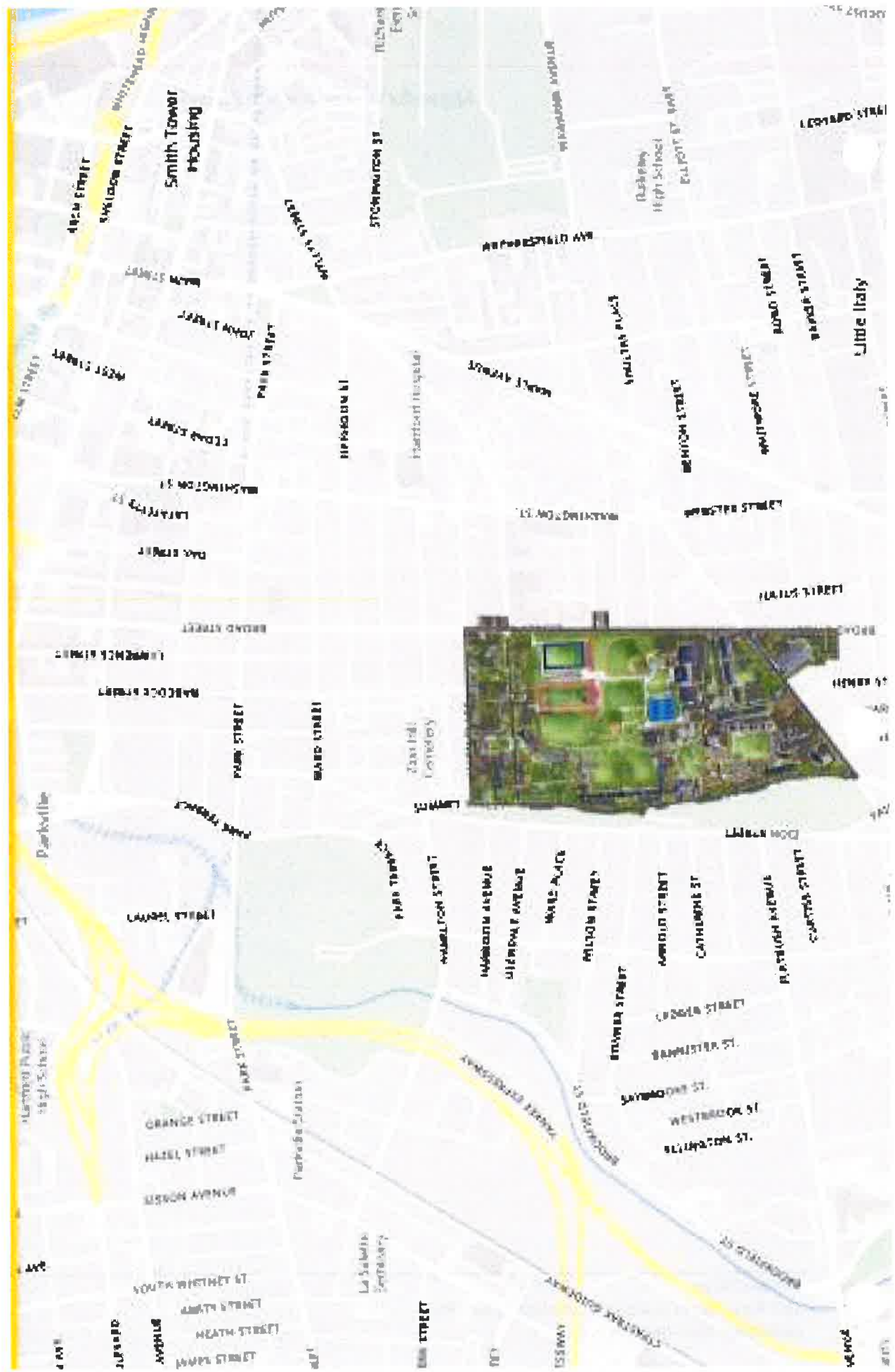
- the location;
- the quantity and type of substance, material or waste;
- the date and the cause of the incident;
- the name and address of the owner; and
- the name and address of the person making the report and his relationship to the owner.

Note: Unless specifically requested, the DEEP does not require a written submission when reporting a spill. However, Trinity College will complete a copy of the Release Notification Form included in Appendix E.

Appendix A - Facility Site Plan

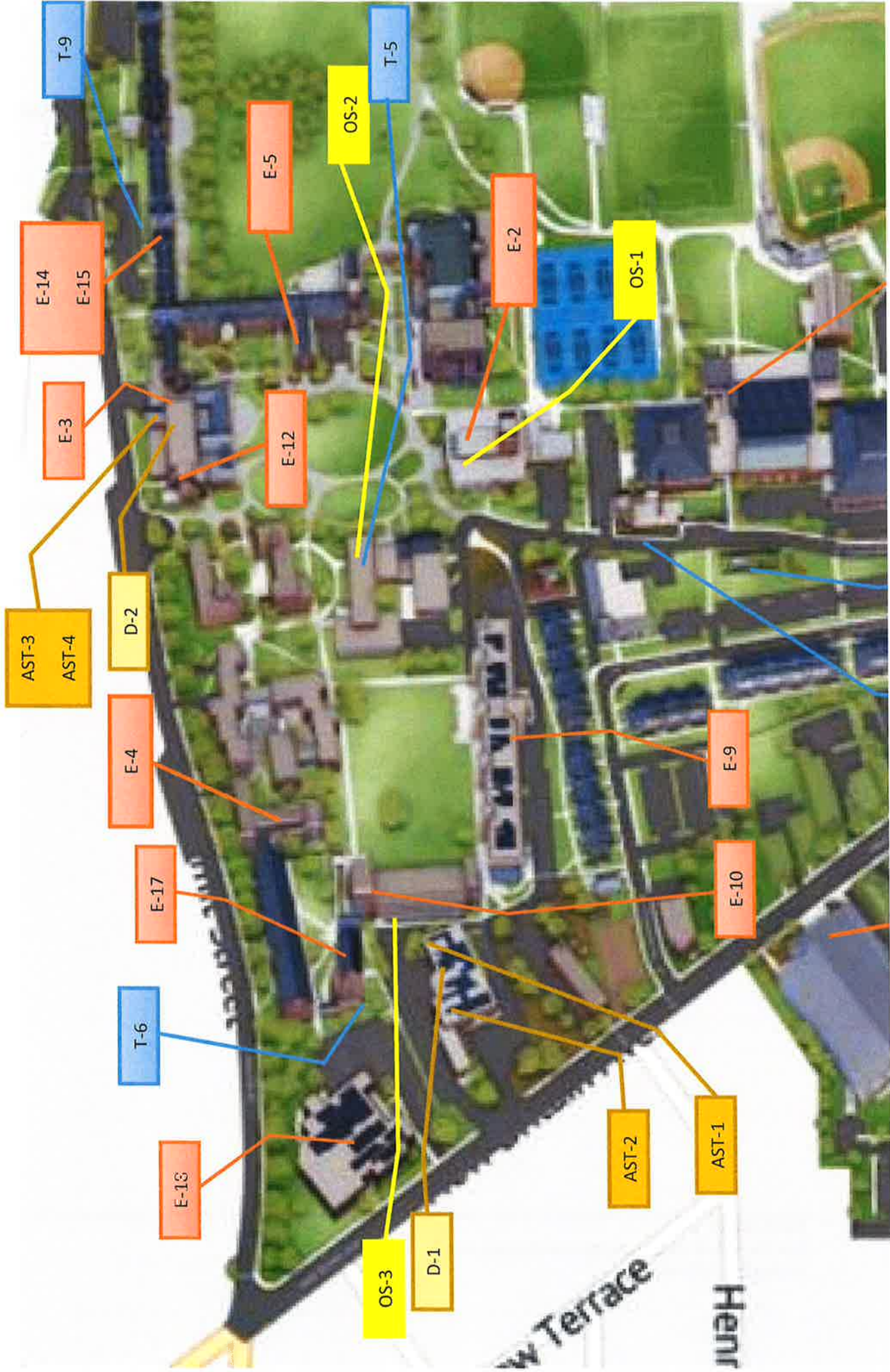
Appendix A: Trinity College Site Maps

FIGURE A-1: Site Plan Relative to Waterways, Roads, and Inhabited



Appendix A: Trinity College Site Maps

FIGURE A-2: Oil Storage Locations



Appendix B - Oil Storage Inventory, Spill Prediction and Impacts Assessment

Appendix B - Oil Storage Inventory, Spill Prediction and Impacts Assessment

Trinity College
OIL STORAGE & EQUIPMENT

Type Map Key Location	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
Aboveground Oil Storage Tanks									
AST-1	Waste Oil	275	Steel	Inside	Waste Lubricant Oil	<ul style="list-style-type: none"> Tank installed within concrete containment structure 	Monthly visual inspection	Buildings & Grounds Garage	<ul style="list-style-type: none"> Leaks collect within secondary containment. Any incidental spills during filling or pumping-out would be contained by the building's floors and walls and would be immediately responded to by personnel working in the garage. Spill kit provided in garage.
AST-2	Diesel Fuel	330	Steel	Inside	Diesel Fuel	<ul style="list-style-type: none"> Tank installed within concrete containment structure 	Monthly visual inspection	Buildings & Grounds Garage	<ul style="list-style-type: none"> Leaks collect within secondary containment. Any incidental spills during filling or pumping-out would be contained by the building's floors and walls and would be immediately responded to by personnel working in the garage. Spill kit provided in garage.
AST-3	Cooking Oil (150 Gal Tank)	150	Steel	Inside	Unused Cooking Oil	<ul style="list-style-type: none"> NEEDS SECONDARY CONTAINMENT 	Monthly visual inspection	Mather Hall	<ul style="list-style-type: none"> Without secondary containment, a large-scale spill or release could result in oil escaping loading dock to outdoor area. NEEDS SPILL KIT
AST-4	Cooking Oil (150 Gal Tank)	150	Steel	Inside	Used Cooking Oil	<ul style="list-style-type: none"> NEEDS SECONDARY CONTAINMENT 	Monthly visual inspection	Mather Hall	<ul style="list-style-type: none"> Without secondary containment, a large-scale spill or release could result in oil escaping loading dock to outdoor area. NEEDS SPILL KIT
Total Oil Volume in ASTs		905							

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**Trinity College
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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
Aboveground Oil Drum/Containers									
D-1	Lubricant Oil (55 Gal. Drums)	275	Steel	N/A	Unused Lubricant Oil	Spill containment pallets	Monthly visual inspection	Buildings & Grounds Garage	<ul style="list-style-type: none"> • Contained inside garage. • Any incidental spills during filling or pumping-out would be contained by the building's floors and walls and would be immediately responded to by personnel working in the garage. • Spill absorbent materials within the garage include mats, rags and speedi-dry.
D-2	Waste Cooking Oil & Grease (55 Gal. Drum)	55	Steel	N/A	Cooking Grease Waste	NEEDS SPILL PALLET	Monthly visual inspection	Mather Hall	<ul style="list-style-type: none"> • Contained inside room/building. • Without secondary containment, a large-scale spill or release could result in oil reaching the floor drain in the room • NEEDS SPILL KIT
Underground Storage Tanks									
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Oil Volume in USTs		0							
Generators									
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Oil Volume in Generators		0							
Elevators									

Appendix B - Oil Storage Inventory, Spill Prediction and Impacts Assessment

Trinity College
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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
E-1	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Admissions & Career Services	<ul style="list-style-type: none"> Leak/spill contained in room/building No open floor drains or exterior doors are within the area of potential discharge
E-2	Elevator	350	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Austin Arts Center	<ul style="list-style-type: none"> Leak/spill contained in room/building No open floor drains or exterior doors are within the area of potential discharge
E-3	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls Doorway bermed due to floor drain in adjacent room 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Ferris Athletic Center)	<ul style="list-style-type: none"> Leak/spill contained in room Containment measures implemented to prevent potential discharge from reaching floor drain.
E-4	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Funston Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge

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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
E-5	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Goodwin-Woodward Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-6	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Hansen Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-7	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Koepfel Community Sports Center	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-8	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Koepfel Student Center / Bistro	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge

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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
E-9	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls Doorway bermed and wells collared 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Life Sciences Center	<ul style="list-style-type: none"> Leak/spill contained in room Containment measures implemented to prevent potential discharge from reaching drains or escaping room.
E-10	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls Floor drain sealed 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Roy Nutt Mathematics, Engineering & Computer Science Center	<ul style="list-style-type: none"> Leak/spill contained in room/building No active floor drains or exterior doors are within the area of potential discharge
E-11	Elevator (Freight/Kitchen)	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Mather Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-12	Elevator (Passenger)	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Mather Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-13	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	North Campus Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-14	Elevator (#1 / North)	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Seabury Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge

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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
E-15	Elevator (#2 / South)	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	Inspected & serviced annually by Kone	Seabury Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-16	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Smith House	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-17	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	Inspected & serviced annually by Kone	Summit Suites East	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-18	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Trinity Commons	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-19	Elevator	150	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Vernon Place	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
E-20	Elevator	100	Reservoir	Inside	Hydraulic Oil	<ul style="list-style-type: none"> Concrete floor and walls Floor drain sealed 	<ul style="list-style-type: none"> Inspected & serviced annually by Kone 	Zachs Hillel House	<ul style="list-style-type: none"> Leak/spill contained in room/building No active floor drains or exterior doors are within the area of potential discharge
Total Oil Volume in Elevators		2650							

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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
Transformers									
T-1	Transformer	245	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Central Energy Plant	Radial/ surrounding ground
T-2	Transformer	520	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Ferris (CL&P owned)	Radial/ surrounding ground
T-3	Transformer	385	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Ferris (CL&P owned)	Radial/ surrounding ground
T-4	Transformer	245	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Hansen Hall	Radial/ surrounding ground
T-5	Transformer	189	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	McCook Hall	Radial/ surrounding ground

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Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
T-6	Transformer	245	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Summit Hill (SE corner of Summit Suites East)	Radial/ surrounding ground
T-7	Transformer	245	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Vernon Place	Radial/ surrounding ground
T-8	Transformer	535	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Vernon St.	Radial/ surrounding ground
T-9	Transformer	190	Steel	Outside	Insulating Oil	Concrete Pad Exempt from secondary containment requirement	Quarterly visual inspection	Seabury Hall (West Side)	Radial/ surrounding ground
Total Oil Volume in Transformers		2,799							
Oil Switches									
OS-1	Oil Switch	92	Steel	Inside	Insulating Oil	Concrete floor and walls	Quarterly visual inspection	Austin Arts Center	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge

Appendix B - Oil Storage Inventory, Spill Prediction and Impacts Assessment

Trinity College

OIL STORAGE & EQUIPMENT

Type	Description	Size (gal)	Tank Material	Outside/ Inside	Contents	Means of Secondary Containment/ Spill Prevention	Inspection/ Test	Location On-Site	Direction and Rate of Flow of Potential Spill <i>The flow rates of oils average up to 2 feet per second.</i>
OS-2	Oil Switch	72	Steel	Inside	Insulating Oil	<ul style="list-style-type: none"> Concrete floor and walls 	Quarterly visual inspection	McCook Hall	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
OS-3	Oil Switch	72	Steel	Inside	Insulating Oil	<ul style="list-style-type: none"> Concrete floor and walls 	Quarterly visual inspection	Roy Nutt Mathematics, Engineering & Computer Science Center	<ul style="list-style-type: none"> Leak/spill contained in room/building No floor drains or exterior doors are within the area of potential discharge
Total Oil Volume in Transformers		236							

Appendix C - Applicability of Substantial Harm Criteria

**APPENDIX C:
APPLICABILITY OF THE
SUBSTANTIAL HARM CRITERIA CHECKLIST**

Facility Name: Trinity College

Facility Address: 300 Summit St, Hartford, CT 06106

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

Yes: _____ No: X

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

Yes: _____ No: X

3. Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments.

Yes: _____ No: X

4. Does the facility have a total oil storage capacity of 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?

Yes: _____ No: X

5. Does the facility have a total oil storage capacity greater than or equal to one 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 five years?

Yes: _____ No: X

Appendix D - SPCC Inspection Checklist

Appendix D – SPCC Oil Storage & Equipment Inspection Log

INSPECTION YEAR: [INSERT CALENDAR YEAR]

ID NUMBER Map Key Location	Location	Description	Size (gal)	Tank Material	Inspection Type / Frequency	JAN		FEB		MAR		APR		MAY		JUN	
						Inspector:	Date:	Inspector:	Date:	Inspector:	Date:	Inspector:	Date:	Inspector:	Date:	Inspector:	Date:

Aboveground Oil Storage Tanks

AST-1	Buildings & Grounds Garage	Waste Oil	275	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*
AST-2	Buildings & Grounds Garage	Diesel Fuel	330	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*
AST-3	Mather Hall	Cooking Oil (150 Gal Tank)	150	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*
AST-4	Mather Hall	Cooking Oil (150 Gal Tank)	150	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*

STORAGE TANK INSPECTION CHECKS:

- Storage tanks checked for signs of deterioration, leaks, or accumulation of oil inside the containment area, or other signs that maintenance or repairs are needed.
- Secondary containment areas and/or other discharge drainage controls are checked for proper drainage, general conditions, evidence of oil, or signs of leakage.
- Check all aboveground valves and pipelines and noting the general condition of items such as transfer hoses, flange joints, expansion joints, valve glands and bodie
- Spill kits/supplies are present and adequately stocked.

*Noted deficiencies are entered and tracked to completion in the SPCC deficiency log found at the end of this form.

Aboveground Oil Drum/Containers

D-1	Lubricant Oil (55 Gal. Drums)	Lubricant Oil (55 Gal. Drums)	275	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*
D-2	Waste Cooking Oil & Grease (55 Gal. Drum)	Waste Cooking Oil & Grease (55 Gal. Drum)	55	Steel	Monthly visual inspection	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*	<input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient*

OIL DRUM / CONTAINER INSPECTION CHECKS:

- Drums/container placed on/in approved secondary containment.

Appendix E - Release Notification Report Form

APPENDIX E: Release Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the appropriate regulatory agencies and emergency response organizations [also see the notification information provided in Section 12 of the Plan]:

Information Provided in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	<input type="checkbox"/> Soil
			<input type="checkbox"/> Water (specify)
			<input type="checkbox"/> Other (specify)
Actions taken			
Damage or injuries	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)	Evacuation needed?	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)
Organizations and individuals contacted	<input type="checkbox"/> National Response Center 800-424-8802 Time		
	<input type="checkbox"/> Cleanup contractor (Specify) Time		
	<input type="checkbox"/> Facility personnel (Specify) Time		
	<input type="checkbox"/> State Agency (Specify) Time		
	<input type="checkbox"/> Other (Specify) Time		

Facility Name: _____

Appendix F - Regulatory Cross Reference

**Appendix F:
SPCC Plan – Regulatory Cross Reference**



Regulatory Citation	Requirement	SPCC Plan Section
112.3(a)	Initial Plan preparation	Section 1.3
112.3(d)	Certified by a registered PE	Not Applicable
112.3(e)(1)	Plan location	Section 1.1
112.4	Spill history and response	Section 1.2
112.5	Plan amendments	Section 1.3
112.7 General Requirements	Management approval	Section 1.5
	Plan follows sequence or includes a cross-reference	Table of Contents and Appendix F
	Facilities, procedures, methods or equipment that are not yet fully operational	Section 3.2
112.7(a)(2)	Reasons for plan deviations, alternative measures and equivalent environmental protection	Sections 1.4, 6.4, and 10.1
112.7(a)(3)	Describes physical layout and includes a diagram	Section 2.0 and Appendix A
112.7(a)(3)(i)	Types of oil and storage capacities for fixed and mobile or portable containers	Section 3.2 and Appendix B
112.7(a)(3)(ii)	Discharge prevention measures	Sections 3.0 and 8.0
112.7(a)(3)(iii)	Discharge or drainage controls	Sections 3.0, 4.0 and 5.0
112.7(a)(3)(iv)	Countermeasures for discharge discovery, response and cleanup	Sections 3.0
112.7(a)(3)(v)	Methods of disposal of recovered materials	Section 12.0
112.7(a)(3)(vi)	Contact lists and phone numbers	Section 12.2
112.7(a)(4)	Information and procedures for oil discharge reporting	Section 12.0
112.7(a)(5)	Plan organized so response procedures are readily usable	Refer to Table of Contents, Section 12.0
112.7(b)	Prediction of direction, rate of flow, and total quantity of oil where reasonable potential for equipment failure	Section 4.0 and Appendix B
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge; identify which are present	Appendix B
112.7(d)	Where secondary containment is impracticable	Not Applicable
112.7(e)	Inspections and tests and records signed by inspector	Section 9.0
112.7(f)(1)	Training of oil-handling personnel	Section 11.0
112.7(f)(2)	Person designated as accountable	Section 11.0

**Appendix F:
SPCC Plan – Regulatory Cross Reference**



Regulatory Citation	Requirement	SPCC Plan Section
112.7(f)(3)	Discharge prevention briefings conducted at least 1/year for oil handling personnel	Section 11.0
112.7(g)	Descriptions of security- access, out of service pipes and loading racks, lighting	Section 10.0
112.7(h)	Tank car and tanks truck loading racks present	Section 8.0
112.7(h)(1)	Loading rack containment system	Not Applicable
112.7(h)(2)	Loading rack - Interlocked warning light or physical barriers, warning signs, brake systems	Not Applicable
112.7(h)(3)	Loading rack – inspection of drains and outlets on tankers prior to filling and departure	Not Applicable
112.7(i)	Brittle fracture evaluation of field constructed aboveground containers	Not Applicable
112.7(j)	Conformance with applicable, more stringent state rules and regulations	Section 12.4
112.7(k)	Qualified oil-filled operational equipment present at the facility – secondary containment/alternative measures	Section 3.3
112.8(b) Facility Drainage		
112.8(b)(1)	Drainage from diked storage areas restrained by valves or manually activated pumps	Not Applicable
112.8(b)(2)	Diked storage drain valves are manual, open-and-closed design; retained storm water is inspected before discharged	Not Applicable
112.8(b)(3)	Undiked area drainage flow receptors (ponds, catchment basins, or returned), and located away from flood areas	Not Applicable
112.8(b)(4)	If not engineered as 112.(b)(3) facility is equipped with a diversion system to retain the oil in the facility	Section 5.0
112.8(b)(5)	Continuous treatment of facility drainage waters	Section 5.0
112.8(c) Bulk Storage Containers		
112.8(c)(1)	Bulk storage containers are compatible with material stored	Section 6.1
112.8(c)(2)	Secondary containment for bulk storage containers	Section 6.2

**Appendix F:
SPCC Plan – Regulatory Cross Reference**



Regulatory Citation	Requirement	SPCC Plan Section
112.8(c)(3)	Control of drainage of uncontaminated rainwater from diked areas	Not Applicable
112.8(c)(4)	Corrosion protection or leak testing of completely buried metal tanks installed after 1974	Section 6.3
112.8(c)(5)	Buried section of partially buried tanks protected from corrosion or cathodic protection	Section 6.3
112.8(c)(6)	Integrity testing of aboveground containers, criteria and recordkeeping	Section 6.4
112.8(c)(7)	Control of leakage through heating coils	Section 6.0
112.8(c)(8)	Liquid level sensing controls	Section 6.5
112.8(c)(9)	Observation of treatment facilities effluent	Section 6.6
112.8(c)(10)	Prompt correction and removal of visible discharges of oil	Section 6.7
112.8(c)(11)	Secondary containment and positioning of mobile or portable containers	Section 6.7
112.8(d) Facility Transfer Operations		
112.8(d)(1)	Buried piping	Section 7.1
112.8(d)(2)	Piping connections at transfer points and out-of-service piping	Section 7.2
112.8(d)(3)	Pipe supports	Section 7.3
112.8(d)(4)	Inspections of aboveground valves, piping and appurtenances; testing on buried piping	Section 7.3
112.8(d)(5)	Vehicle warnings	Section 7.0
112.20(f)	Facility Response Plan applicability	Appendix C