

# **SPCC & PPC Combined Facility Response Plan**



For the:

**Main Campus of Robert Morris University**  
6001 University Boulevard  
Moon Township, Pennsylvania, 15108

**July 2024**

**SEE TABLE 1 ON INSIDE COVER FOR FACILITY  
EMERGENCY CONTACT NUMBERS**

**TABLE 1 – LIST OF EMERGENCY CONTACTS**  
**(NAMES IDENTIFIED ON THIS LIST ARE TO BE CONTACTED BY THE PERSON IDENTIFIED)**

<b>Contacts</b>	<b>Contact Description</b>	<b>Contact Information</b>	<b>Hours of Operation</b>
<b>FACILITIES CHAIN-OF-COMMAND</b>			
Public Safety Department	<p style="text-align: center;"><b>CALL FIRST!!!</b></p> <p>In the event of a spill or emergency, first responders shall contact Public Safety as the first emergency contact.</p> <p>During the emergency operations, Public Safety or the Emergency Coordinator are responsible for making emergency contacts identified on this list.</p>	412-397-2424	24 Hours
Timothy Kirsch, CIH Senior Director, Capital Projects and Safety <b>(Emergency Coordinator)</b>	Public Safety (Campus Police) will contact the <b>Emergency Coordinator or Alternate Emergency Coordinator</b> in the event of a large fuel spill or leak. The Emergency Coordinator will communicate disaster incidents with Senior Administration.	Work: 412-397-6282 Mobile: 412-812-1134	24 Hours
Matt Hyatt, CEFP Senior Director, Maintenance and Plant Engineering <b>(Alternate Emergency Coordinator)</b>		Work: 412-397-6343 Mobile: 724-480-5290	24 Hours
<b>LOCAL OUTSIDE ASSISTANCE / EMERGENCY RESPONSE</b>			
Moon Township Police / Fire Department  1900 Beaver Grade Road, Moon Twp, PA 15108	<p>Call in the event that a fire or accident involves injury or if the emergency or spill impacts traffic.</p> <p>The emergency coordinator will contact if the release or spill is too large for facility personnel to contain and clean-up.</p> <p><b><u>Call 911 immediately following a hazardous materials release above the reportable quantity to satisfy LEPC notification requirements.</u></b></p>	<p><b>911 (emergency)</b></p> <p>Police: 412-262-5000 (non-emergency) Fire Dept: 412-262-5004 (non-emergency)</p>	24 Hours
PA State Police Troop B Pittsburgh Station Moon Township, PA	Provides traffic and crowd control.	412-299-1607 or 911	24 Hours
Valley Ambulance Authority	Provides medical assistance and transportation	<p><b>911 (emergency)</b></p> <p>412-262-2621 (non-emergency) 412-471-3875</p>	24 Hours
Duquesne Light Co.	Call in the event of a transformer spill	(Summary Account # 9001-262-217-001)	24 Hours
Peoples Gas	Call in the event of a gas leak or spill	1-800-764-0111 Say "Emergency" when prompted	24 Hours
<b>PRIVATE AGENCIES</b>			
CHEMTREC	Provides emergency response information	800-424-9300 800-255-3924	24 Hours
Poison Control Center	Pittsburgh Poison Center	800-222-1222	24 Hours
<b>EMERGENCY RESPONSE CONTRACTORS</b>			
Heritage Environmental	External spill response support, including inventory, collection, removal, and proper disposal of various wastes	800-487-7455	24 Hours
Clean Harbors	External spill response support, including inventory, collection, removal, and proper disposal of various wastes	1-800-645-8265	24 Hours

**TABLE 1 – LIST OF EMERGENCY CONTACTS CONT.**

<b>COUNTY AGENCIES</b>			
Allegheny County Emergency Services (HAZMAT / EMA)	Contact for technical guidance, information, or if assistance is needed regarding a spill or release.  Contact in the event of a large-scale incident with the potential to harm life or property.	<b>911 (emergency)</b>  412-473-2550 (non-emergency)	24 Hours
<b>STATE AGENCIES</b>			
PADEP	Call the PADEP hotline and notify the PADEP Regional Office of a spill or release of <b>regulated substances in excess of its reportable quantity, any release of a regulated substance not completely recovered or removed within 24 hours of the release, and 25 gallons or more of oil.</b>  Must also be notified <b>if a spill gets off the site and into a nearby stream or waterway or into the public sewer.</b>	<b>Emergency Response Hotline:</b> <b>1-800-541-2050</b>  Southwest Regional Office: 412-442-4000	24 Hours
PA Fish & Boat Commission	The Pollution Hotline should be used in the event of a spill or release on any waterway.	855-347-4545	24 Hours
PEMA	<b>MUST BE NOTIFIED WHEN ANY OF THE FOLLOWING OCCUR:</b> <ul style="list-style-type: none"> <li>• A large-scale incident with the potential to harm life or property.</li> <li>• A spill gets off the site and into a nearby stream or waterway or into the public sewer system.</li> </ul> PEMA will also notify PADEP of reported spills.	717-651-2001	24 Hours
<b>FEDERAL AGENCIES</b>			
TO BE NOTIFIED BY THE EMERGENCY COORDINATOR IN THE EVENT THAT AN OIL SPILL... <ul style="list-style-type: none"> <li>• Violates applicable water quality standards;</li> <li>• Causes a film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines; or</li> <li>• Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.</li> </ul>			
<b>EPA REGIONAL ADMINISTRATOR MUST ALSO BE NOTIFIED IN THE EVENT OF...</b> <ul style="list-style-type: none"> <li>• A single spill incident greater than 1,000 gallons of oil into navigable waters.</li> <li>• Two reportable oil spills of more than 42 gallons within any 12-month period.</li> </ul>			
National Response Center (NRC)	Reportable Spill Hotline  <b>Must also be contacted in that event that a spill or release of <u>any regulated substance exceeds its reportable quantity.</u></b>	800-424-8802	24 Hours
EPA Region III	Administers the EPA Region III Oil Program	<b>Regional Response Hotline:</b> <b>215-814-9016</b> Address: Four Penn Center 1600 JFK Blvd. Philadelphia, PA 19103-2029	24 hours

If the Emergency Coordinator (EC) determines that the facility has had a reportable release, as defined in **Table 1 or Section 1.2.4**, the EC must immediately notify the Local Emergency Planning Committee (via 911), the National Response Center (NRC), and the Pennsylvania Emergency Management Agency (PEMA) and provide the following information:

1. Your name, location, organization, and telephone number;
2. Name and address of the party responsible for the incident; or name of the carrier or vessel, the railcar/truck number, or other identifying information;
3. Date and time of the incident;
4. Location of the incident;
5. Source and cause of the release or spill;
6. Types of material(s) released or spilled;
7. Quantity of materials released or spilled;
8. Medium (e.g. land, water) affected by release or spill;
9. Danger or threat posed by the release or spill;
10. Number and types of injuries or fatalities (if any);
11. Weather conditions at the incident location;
12. Whether an evacuation has occurred;
13. Other agencies notified or about to be notified; and
14. Any other information that may help emergency personnel respond to the incident.

**PROFESSIONAL ENGINEER CERTIFICATION (40 CFR 112.3(d))**

By means of this certification the Professional Engineer attests:

- (i) That he/she is familiar with the requirements of this part;
- (ii) That he/she or his/her agent has visited and examined the facility;
- (iii) That the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part;
- (iv) That procedures for required inspections and testing have been established; and
- (v) That the Plan is adequate for the facility.

A site review was conducted at this facility and, anything found to be needing attention is listed in the Implementation Schedule in Section 7.4. Such certification shall in no way relieve the owner or operator of a facility of his duty to prepare and fully implement such Plan in accordance with the requirements of this part.



Megan M. Ponzo  
Megan M. Ponzo, P.E.

7/24/2024  
Date

PE089828  
Registration Number

Pennsylvania  
State

## MANAGEMENT CERTIFICATION

1. Facility and Owner Identification:

Robert Morris University  
Main Campus  
6001 University Boulevard  
Moon Township, PA 15108

2. Management Approval:

Full approval is extended by management at a level with authority to commit the necessary resources.

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

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

3. Management Certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who will manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

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

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

**CERTIFICATION OF THE APPLICABILITY OF  
THE SUBSTANTIAL HARM CRITERIA**

**Facility Name: Robert Morris University, 6001 University Blvd.  
Moon Township, Pennsylvania, 15108**

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

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 storage tank area?

Yes  No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes  No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula) such that a discharge from the facility would shut down a public drinking water intake?

Yes  No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes  No

**Certification:**

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

Signature:

Name (Please type or print):

\_\_\_\_\_

\_\_\_\_\_

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

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

**REGULATORY CROSS REFERENCE TABLE**

Applicable Regulatory Requirement	Regulatory Citation	SPCC Plan Section
<b>Spill Prevention, Control, and Countermeasures Plans (40 CFR Part 112)</b>		
Preparation and implementation of SPCC Plans	112.3	--
- professional engineer certification	112.3(d)	iv
- maintain plan on-site	112.3(e)	Section 1.0
- qualified Facilities	112.3(g)	N/A
- five-year plan review	112.5(b)	Appendix B
Amendment by EPA	112.4	Section 7.1
Amendment by owner/operator	112.5	Section 7.2
SPCC Plan guidelines	112.7	--
- Full approval of management	112.7	v
- Commitment of resources	112.7	v
- Regulatory Cross-Reference	112.7	vii
- Implementation of additional Facilities, Procedures, etc.	112.7	Section 7.4
- Discussion of conformance with this Part	112.7(a)(1)	Section 1.0
- Spill history	112.7	Section 1.2.4
- Description of equivalent environmental protection	112.7 (a)(2)	Section 1.0
- Description of physical layout of facility, including diagram	112.7 (a)(3)	Section 1.2 & Figures
• type of oil in each container and its storage capacity	112.7 (a)(3)(i)	Section 1.2 and Table 2
• discharge prevention measures including procedures for routine handling of products	112.7 (a)(3)(ii)	Section 3.0
• discharge or drainage controls	112.7 (a)(3)(iii)	Section 8.3.1
• countermeasures for discharge discovery, response, and cleanup	112.7(a)(3)(iv)	Section 5.0
• methods of disposal of recovered materials	112.7(a)(3)(v)	Section 5.3
• contact list and phone numbers	112.7(a)(3)(vi)	Table 1
- Discharge Contact list and reporting procedures	112.7 (a)(4)	Section 1.2.4 and Table 1
- Prediction of direction, rate, and quantity of oil which could be released	112.7(b)	Section 4.4
- Containment and/or diversionary devices (on-shore facilities)	112.7(c)	Section 8.1.1
- Demonstration of containment impracticability/contingency plan	112.7(d)	Section 8.2
Written inspection procedures and signed records	112.7(e)	Section 6.0
Training	112.7(f)	Section 3.6
- instruction of personnel	112.7(f)(1)	Section 3.6
- designated person for oil spill prevention	112.7(f)(2)	Table 1
- spill prevention briefings	112.7(f)(3)	Section 3.6
Security	112.7(g)	Section 1.2.2
Tank car and tank truck loading/unloading	112.7(h)	Section 8.3.4
- containment for truck loading/unloading	112.7(h)(1)	Section 8.3.4
- prevention of vehicle disconnection	112.7(h)(2)	Section 8.3.4
- examination of drain and outlets prior to filling and departure	112.7(h)(3)	Section 8.3.4
Brittle fracture evaluation of field constructed aboveground containers	112.7(i)	Section 6.4
Other applicable state rules, regulations, and guidelines	112.7(j)	Section 1.0
Qualified oil-filled operational equipment	112.7(k)1-2	Section 8.2
SPCC Requirements for Onshore Facilities	112.8	--
- Facility drainage	112.8(b)	Section 1.2.1



<b>Applicable Regulatory Requirement</b>	<b>Regulatory Citation</b>	<b>SPCC Plan Section</b>
• drainage from diked areas	112.8(b)(1)	Section 8.3.1
• inspection of retained stormwater prior to Discharge	112.8(b)(2)	Section 8.3.1
• drainage from undiked areas	112.8(b)(3)	Section 8.3.1
• diversion system for final discharge	112.8(b)(4)	Section 4.1
• use of lift pumps	112.8(b)(5)	N/A
- Bulk Storage Containers	112.8(c)	Section 8.3.1
• compatibility of storage tank with oil	112.8(c)(1)	Section 8.3.1
• secondary containment	112.8(c)(2)	Section 8.3.1
• rainwater bypass (inspection and recordkeeping)	112.8(c)(3)	N/A
• underground / partially buried tanks	112.8(c)(4) & (5)	N/A
• testing and inspections of aboveground tanks	112.8(c)(6)	Section 8.3.1
• control of leakage through internal heating coils	112.8(c)(7)	N/A
• fail-safe engineering for tanks	112.8(c)(8)	Section 8.3.1
• observation of effluent discharges to waters	112.8(c)(9)	N/A
• correction of visible oil leaks	112.8(c)(10)	Section 8.3.1
• positioning of mobile/portable oil storage tanks	112.8(c)(11)	N/A
- Transfer operations	112.8(d)	Section 8.3.3
• protection and inspection of buried piping	112.8(d)(1)	N/A
• capping of out-of-service pipeline	112.8(d)(2)	Section 8.3.3
• design of pipe supports	112.8(d)(3)	Section 8.3.3
• examination and testing of aboveground valves and pipelines	112.8(d)(4)	Section 8.3.3
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## 1.0 INTRODUCTION

This Combined Spill Prevention, Control and Countermeasure (SPCC) and Preparedness, Prevention, and Contingency (PPC) Plan (Combined Facility Response Plan) has been prepared to help prevent emergencies and accidents and to provide effective and efficient response to emergencies and accidents that may occur at Robert Morris University (RMU) facilities.

This Combined Facility Response Plan describes the practices, procedures, structures, and equipment utilized by site personnel to prevent spills at RMU facilities and to help eliminate or reduce harmful effects on human health and the environment. This Plan also documents and identifies personnel responsible for responding to a site spill, steps, and procedural measures to report a spill, site procedures to prevent spills, steps to prepare for a spill response, and countermeasures to contain, clean up, and mitigate the effects of a spill.

This Combined Facility Response Plan was developed to satisfy the combined applicable requirements of the federal SPCC Rule, in accordance with Title 40, Code of Federal Regulations (CFR), Part 112 (40 CFR 112), and the Pennsylvania Department of Environmental Protection (PADEP) August 6, 2005, *Guidelines for the Development and Implementation of Emergency Response Plans* which outlines the requirements for PPC Plans. It is noted that a facility-specific response plan for potential oil spills consistent with 40 CFR 112 Appendix F is not required, as demonstrated by the Certification of the Applicability of the Substantial Harm Criteria (page vi). The master copy of the Plan will be stored in the Emergency Coordinator's (EC) office.

The RMU Main Campus is a non-transportation-related facility that is subject to SPCC regulations due to the following:

- The location of the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States; and
- The total aboveground storage capacity for oil-related substances exceeds 1,320 gallons (calculated total of containers with a capacity of 55 gallons or more).

The Plan is not required to be filed with the United States Environmental Protection Agency (USEPA), but a copy must be maintained onsite and available for review during normal working hours. However, the Plan must be submitted to the USEPA Region III Administration and the Pennsylvania Department of Environmental Protection (PADEP) Southwest Regional Office along with other information specified in 40 CFR 112.4, if any of the following occur:

- The facility discharges more than 1,000 gallons of oil into or upon navigable waters of the United States or adjoining shorelines in a single event;
- The facility discharges more than 42 gallons of oil in each of two discharge events within any 12-month period; or
- Representatives from the USEPA and/or PADEP request copies of the Plan.

The Plan must be reviewed once every five years to include more effective prevention and control technology if such technology will significantly reduce the likelihood of a discharge event and has been proven in the field. Technical amendments to the Plan must be certified by a Professional Engineer.

## 1.1 Purpose and Objectives

The Combined Facility Response Plan will be used as a guideline for procedures to be followed when responding to discharges of oil or hazardous substances within the confines or originating from the RMU Main Campus. The Plan will also serve as a procedural guidebook for site personnel to follow to help prevent discharges of oil and hazardous substances, to respond to a site spill, procedures to follow in identifying and reporting a release, countermeasures to contain the release, and ultimately assist site personnel in cleaning up the waste and disposing of it.

The Plan will be kept current to reflect changes in operations or regulatory requirements. At a minimum, the Plan will be reviewed once every five years by the facility EC and updated as needed. The EC is the Senior Director, Capital Projects and Safety at the Main Campus. Updated sections will be incorporated into the Plan and signed by the EC.

The objectives of the Combined Facility Response Plan were developed in accordance with current EPA, PADEP, Occupational Safety and Health Administration (OSHA), and local government requirements when considering the prevention, containment, mitigation, and cleanup of oil and hazardous substance spills and releases. The Plan establishes the responsibilities, duties, and key resources to be employed in the event of an accidental release. The Plan will also define an organized, planned, and coordinated course of action to be followed in case of fire, explosion, or discharge of a hazardous substance that could threaten human health or the environment.

## 1.2 Site Description and Background Information [40 CFR 112.7(a)]

This section provides a brief background of the facility setting, activities and operations, security, spill history, identification of spill areas, and identification of drainage pathways and distance to navigable waterways.

### 1.2.1 Site Description and Location

The Main Campus of RMU is located at **6001 University Boulevard in Moon Township, Allegheny County, Pennsylvania**. The campus consists of classroom and administrative buildings and dormitories, athletic fields, and paved parking areas. No manufacturing processes are conducted at this facility.

**Figure 1 – Facility Location Map** includes a 7 ½ minute USGS Quadrangle Map that identifies the approximate location of the facility. **Figure 2 – Facility Layout and Surface Drainage Map** provides a facility layout and surface drainage map of the Main Campus of RMU.

Storm water originating from parking lots, roof drains, and storage areas flows into an underground storm water collection system and is subsequently discharged to several storm water detention ponds on the property, which ultimately drain to the storm water collection system for Moon Township. Building floor drains in the maintenance area connect with a sub-grade drainage system which also discharges to the Moon Township storm sewer system. The nearest water body to the RMU Main Campus is the Ohio River which is located approximately 1 mile northeast of the facility.

## 1.2.2 Site Security [40 CFR 112.7(g)]

Security cameras are staged in and around campus buildings. The campus police and Public Safety Department is located in the Barry Center, on the south side of the campus. Public Safety performs routine patrols throughout the campus. The facility maintains adequate lighting to assist in the discovery of releases from potential spill areas at night and to deter acts of vandalism.

## 1.2.3 Material Inventory [40 CFR 112.7(a)]

The RMU Main Campus has twelve (12), diesel-fueled, emergency generator units staged inside and outside throughout campus. The generators utilize a diesel fuel tank that is located within the unit. A 269-gallon diesel fuel tank is utilized for the Washington Hall generator unit. The generator unit located outside on the south side of Lafayette Center contains a 366-gallon diesel tank. The generator unit located in the Patrick Henry generator building utilizes a 194-gallon diesel tank. Additional emergency generator units are located at Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Rockwell School of Business, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, the Wheatley Center, and the John Jay/Scaife Building. Various chemicals, such as glues, adhesives, solvents, and paints, are stored in buildings throughout the campus, but are primarily found in the Facilities Service Center. Minimal quantities of chemicals are also stored in the science laboratories in the John Jay Building. Water treatment chemicals are stored within Patrick Henry Center and Washington Hall for descaling the building cooling systems and preventing corrosion to prolong the life of the system equipment. There are also sixteen (16) pad-mounted oil-filled transformer units, owned by Duquesne Light Co., located throughout the campus.

**Table 2 – Material and Waste Inventory** presents a material and waste inventory of oil and non-oil materials managed at the facility which have the potential for causing environmental degradation or endangerment of public health and safety through accidental release. Corresponding locations are presented in **Figure 2**. Hard copies of the Safety Data Sheets (SDS) are maintained by the departments and are available via the RMU Safety Services website ([Safety Services | Robert Morris University \(rmu.edu\)](https://www.rmu.edu/safety-services)). The RMU personnel who oversee and regularly inspect the facility's material and waste inventory will update the SDS master binder, located in the Facilities Operations Office, as changes are made to the facility's inventory. The designated Emergency Coordinators identified in **Table 1** will be responsible for the oversight of the material and waste inventory for this facility.



**TABLE 2 – MATERIAL AND WASTE INVENTORY**

<b>Material/Waste (Non-oils)</b>	<b>Storage Location</b>	<b>Normal Inventory</b>
Paint	Facilities Service Center	500 gallons
Athletic Field Line Paint	Facilities Service Center	75 gallons
Paint Thinner/Remover	Facilities Service Center	5 gallons
Acetylene	Facilities Service Center	5 cylinders (sizes vary)
Oxygen	Facilities Service Center	5 cylinders (sizes vary)
Propane	Facilities Service Center	5 cylinders (sizes vary)
Sodium (Salt)	Facilities Service Center	500 pounds
Portland Cement	Facilities Service Center	250 pounds
Water Treatment Chemicals	Patrick Henry Center	180 gallons
Water Treatment Chemicals	Washington Hall	180 gallons
<b>TOTAL</b>		940 Gallons/750 Lbs./ 15 Gas Cylinders

<b>Materials/Waste (Oils)</b>	<b>Storage Location</b>	<b>Normal Inventory</b>
Oils (Pad-mounted Transformer Units)	Throughout campus (see Figure 2 for locations)	(1) 150 KVA (1) 225 KVA (5) 300 KVA (6) 500 KVA (3) 750 KVA (no volumes available)
Hydraulic Fluid (Elevators)	Patrick Henry Center UPMC Events Center Massey Hall Nicholson Center Joe Walton Stadium Athletic/Student Rec Concord Hall John Jay Scaife Lexington Hall Salem Hall Wheatley Center Rockwell School of Business Yorktown Hall	165 gallons 165 gallons x 2 165 gallons 165 gallons x 3 165 gallons 165 gallons 165 gallons x 2 165 gallons x 2 165 gallons 165 gallons 165 gallons x 2 165 gallons 165 gallons 165 gallons Non-oil elevators
<b>TOTAL</b>		3,135 Gallons

**TABLE 2 – MATERIAL AND WASTE INVENTORY CONT.**

Materials/Waste (Oils)	Storage Location	Normal Inventory
Emergency Generator Units (associated diesel fuel tanks)	Tank 01 – within the Facilities Service Center generator unit	One 600-gallon tank
	Tank 02 – within Washington Hall generator unit	One 269-gallon tank
	Tank 03 – within Lafayette generator unit	One 366-gallon tank
	Tank 04 – within the Patrick Henry Center generator unit	One 194-gallon tank
	Tank 05 – within the Concord Hall generator unit	One 366-gallon tank
	Tank 06 – within the Salem Hall generator unit	One 1,700-gallon tank
	Tank 07 – within the Athletic Building/Joe Walton Stadium generator unit	One 145-gallon tank
	Tank 08 – within the Rockwell School of Business generator unit	One 126-gallon tank
	Tank 09 – within the Franklin Center generator unit	One 366-gallon tank
	Tank 10 – within the Hale Center generator unit	One 600-gallon tank
	Tank 11 – within the Wheatley Center generator unit	One 308-gallon tank
	Tank 12 – within the John Jay Center / Scaife generator unit	One 380-gallon tank
TOTAL		5,420 Gallons

**1.2.4 Spill History Information and Notifications**

According to a review of facility records and interviews with RMU personnel, there have been no recorded reportable spills or releases at this facility in the past three years. In the event of a spill, the EC will gather preliminary spill information and complete the required agency notifications as described below. Records of each spill event will be maintained.

In the event of an emergency, **Table 1** provides a list of the individuals that are qualified and have assumed the responsibility to act as EC for the facility. They are listed in the order to be contacted in the event of an emergency or spill. The primary EC is responsible for notifying all the following individuals of a reportable release incident.

**Reporting to the appropriate EPA regional office and the National Response Center (800-424-8802) is required immediately for discharges that:**

- Violate applicable water quality standards; or
- Cause a film or sheen upon or discoloration 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 EPA Regional Administrator must also be notified if there is a discharge of:**

- More than 1,000 gallons of oil in a single discharge to navigable waters or adjoining shorelines; or
- More than 42 gallons of oil in each of two discharges to navigable waters or adjoining shorelines occurring within any twelve-month period.

**If a spill gets off the site and into a nearby stream or waterway, or into the public sewer system, the Emergency Coordinator shall contact the agencies listed below:**

- National Response Center ..... 1-800-424-8802 (24 Hr.)
- Pennsylvania DEP – Southwest Regional Office..... (412) 442-4000 (24 Hr.)
- Pennsylvania Emergency Management Agency (PEMA).....(717) 651-2001 (24 Hr.)

Pennsylvania requires that spill notification be made as soon as possible but within 24 hours of discovery.

**Any release of regulated substances in excess of its reportable quantity, any release of a regulated substance not completely recovered or removed within 24 hours of the release, and 25 gallons or more of oil, must be reported to the Pennsylvania DEP at the number given above.**

In the event of a large-scale incident with the potential to harm life or property, the Emergency Coordinator should also notify the agencies listed below:

- Allegheny County Emergency Management Agency.....(412) 473-2550
- Pennsylvania Emergency Management Agency (PEMA).....(717) 651-2001 (24 Hr.)

When speaking to the above agencies, be prepared to supply the following information:

- **Time, location, and source of the spill;**
- **Type and quantity of material spilled;**
- **Cause and circumstances of the spill;**
- **Hazards associated with the spill;**
- **Personal injuries, if any;**
- **Corrective action taken or planned to be taken;**

- **Name and telephone number of the individual reporting the spill; and**
- **Any additional pertinent information.**

**Appendix B** provides the Verbal Incident Report Form, as a reference.

A written report of the incident must be reported to the PADEP within 14 days of the initial release or incident. The report shall contain the following information:

1. Name, address, and telephone number of the individual filing the report;
2. Name, address, and telephone number of the facility;
3. Date, time, and location of the incident;
4. A brief description of the circumstances causing the incident;
5. Description and estimated quantity by weight or volume of materials or wastes involved;
6. An assessment of any contamination of land, water, or air that has occurred due to the incident;
7. Estimated quantity and disposition of recovered materials or wastes that resulted from the incident; and
8. A description of what actions the facility intends to take to prevent a similar occurrence in the future.

A Written Follow-Up Incident Report Form is also provided in **Appendix B**.

Emergency contacts and circumstances that warrant their notification are also included in **Table 1 – List of Emergency Contacts**.

### **1.3 Existing Emergency Response Plans**

RMU currently has an Incident Command & Communications Plan that establishes responsibilities in the event of an emergency or disaster affecting the University, its students, faculty, or staff, including policies and procedures for managing communications during and immediately following such situations. This plan provides a framework for appropriate responses to various types and levels of emergency situations that may arise. Procedures and processes within the scope of this plan are intended to reduce risk to human life, protect the environment, preserve property, minimize danger, promote recovery, and restore University operations.

### **1.4 Identification of Potential Spill Areas**

A potential spill area is an area or storage location that could produce a given spill in excess of 55 gallons. Potential spill areas throughout the site are summarized in **Table 3** and include the diesel fuel tanks associated with emergency generator units located at:

- Washington Hall
- Lafayette Center
- Patrick Henry Center
- the Facilities Service Center
- Concord Hall
- Salem Hall
- the Athletic Building/Joe Walton Stadium,
- Franklin Center

- Rockwell School of Business
- Hale Center
- Wheatley Center
- John Jay Center / Scaife
- Paint and solvents storage area - Facilities Service Center
- 16 pad-mounted transformer units (owned by Duquesne Light Co., located throughout the campus)

See **Figure 2 – Facility Layout and Surface Drainage Map** for the location of potential spill areas. Flammable materials in storage cabinets are not included as potential spill areas because a spill of 55-gallons or more is not likely to occur.

Site-specific spill contingency procedures containing instructions for responding to spills have been prepared for each of these areas. **Table 3** lists the potential spill areas along with the page number where each site-specific contingency procedure can be found:

**TABLE 3 – POTENTIAL SPILL AREAS**

Potential Spill Areas	Substances Stored	Plan Page #
Emergency Generators (throughout campus)	Diesel fuel	19
Paint and Solvent Storage Area – Facilities Service Center	Paint and solvents in stock yard used by road painting crew	20
Pad & Pole-Mounted Transformers – Refer to Figure 2 – Facility Layout and Surface Drainage Map for specific location of drainage for each transformer	Transformer Oil (Non-PCB contaminated)	21
Elevator Hydraulics (throughout campus)	Hydraulic Fluids	22

If there is a spill at one of the sites listed in **Table 3**, go to the site-specific spill contingency procedures in Section 4.4 for response instructions.

Potential spill scenarios include:

- Spill/release due to equipment/container rupture, leakage, or failure; and
- Spill/release during oil-filled operational equipment maintenance.

Spill prevention and containment features include:

- No loose combustible material or empty or full drums are permitted in material storage, oil-filled operational equipment, or containment areas;
- Labeling or signage indicates the container contents;
- Routine inspections and maintenance of oil-filled operational equipment performed by outside contractors;
- Routine inspections and maintenance of transformers performed by Duquesne Light Co.;
- Spill response equipment (booms, sorbent pads, etc.) is stored throughout the Facilities Service Center;

- Spill kits are stored in the science labs;
- Water treatment chemicals are staged on spill containment pallets within buildings; and
- Spill containment pads are located at all elevator locations.

## **2.0 DESCRIPTION OF PLAN IMPLEMENTATION**

This section contains information on the organizational structure for implementation of the Combined Facility Response Plan, list of emergency contacts and chain-of-command information in the event of an emergency, and duties and responsibilities of the Emergency Coordinator.

### **2.1 Organizational Structure of Site for Plan Implementation**

RMU has designated certain individuals with the responsibility for implementing, maintaining, and updating the Combined Facility Response Plan. The Plan should be reviewed and updated routinely or as needed to reflect any changes at the facility but, at a minimum, will be reviewed and certified once every five (5) years by a Registered Professional Engineer.

*If the Plan fails in an emergency, the Plan will be reviewed and revised to meet the facility's need(s).*

### **2.2 List of Emergency Contacts and Chain-of-Command [40 CFR 112.7(a)(3)(vi)]**

In an emergency, contact the listed emergency contacts in the order shown in **Table 1 – List of Emergency Contacts**. The list is the order in which they will assume responsibility as alternates. One (1) of the listed persons will be on-site or on-call to act as the EC. This list will be posted on bulletin boards within the facility so that the EC can be contacted in the event of an emergency.

The Emergency Response Contractors and/or local municipality listed in **Table 1** may be contacted at the discretion of the EC if departmental forces cannot resolve the situation.

### **2.3 Duties and Responsibilities of the Emergency Coordinator [40 CFR 112.7(a)(4)]**

This section discusses the duties and responsibilities of personnel who are involved with the management and/or the implementation and oversight of the Combined Plan.

#### **2.3.1 Responsibilities of Site Personnel [40 CFR 112.7(f)(2)]**

##### **Emergency Coordinator (EC)**

The EC determines the human and equipment resources required to respond to a spill based on an assessment of the magnitude of the spill and coordinates spill response efforts between the PADEP and municipal first responders. The EC oversees and monitors the spill response to ensure that response teams take appropriate actions to prevent threats to human health or the environment.

The EC is responsible for identifying the character, source, amount, and the extent of the release, as well as other items needed for notification. The EC must determine the type and quantities released and must be able to implement certain actions to prevent further release and contain what has already been released.

The EC is responsible for activating internal alarms and hazard communications to notify all facility personnel of an emergency. The EC must assess the risk to human health and the environment. The EC should be a full-time employee with the training required to manage a spill or release.

The EC is responsible for coordinating the effort in the containment, control, and cleanup of a spill. The EC will be responsible for maintaining the Combined Plan and updating the Plan when there are changes to applicable federal, state, and local regulations regarding releases of oil and hazardous substances. This person will be responsible to review the plan at least once every five (5) years to verify if actions identified in the Plan are still applicable with activities conducted at the facility. Further, the EC will review and amend the Combined Plan whenever there is a change in facility design, construction, operation, or maintenance which materially affects the facility's potential for the discharge of chemicals into or upon navigable waters. As personnel are assigned a role or responsibility change, the EC will need to assign those responsibilities to new personnel and assure that the plan is updated accordingly.

### **Alternate EC**

The Alternate EC assumes all responsibilities of the EC if he/she is not readily available.

## **3.0 SPILL AND RELEASE PREVENTION**

### **3.1 Pre-Release Planning**

The primary sources of potential pollutants (including waste) are listed below with the pollution incident prevention practices also indicated.

#### **3.1.1 Emergency Generator Units**

**Figure 2 – Facility Layout and Surface Drainage Map** presents the location of the emergency generator units at this facility. The following summarizes the standard setup and maintenance of these units.

- All diesel fuel tanks are contained within a generator unit.
- Venting capacity suitable for fill and withdrawal rates when refilling generators.
- No loose combustible material or empty or full drums are permitted within designated containment areas or near the generators.
- Generator diesel fuel tanks are checked for capacity prior to being filled.

#### **3.1.2 Paints and Solvents**

- Paints and solvents are stored in the Paint Room of the Facilities Service Center.
- The line paint for athletic fields is water-based.

#### **3.1.3 Pad and Pole-Mounted Transformers**

- All transformers are owned and maintained by Duquesne Light Co.
- Oils associated with transformers are operated and maintained by Duquesne Light Co.
- Only authorized, trained, and knowledgeable personnel handle transformer oil.

### **3.1.4 Hydraulic Fluids for Elevators**

- All elevators are maintained by external elevator vendors.
- Hydraulic fluids associated with elevators are stored inside the elevator workings and single walled reservoir tanks for each elevator within buildings throughout the campus.
- Only authorized, trained, and knowledgeable personnel handle hydraulic fluids.

### **3.2 Material Compatibility**

All chemicals at the facility are stored in containers made of materials that are compatible with the material being stored. Ancillary equipment (i.e., elevators, generators, and transformers) is compatible with their contents. The ancillary equipment is suitable for the pressure and temperature conditions that each encounter.

The Emergency Coordinator is responsible for reviewing all materials utilized at the facility to ensure compatibility with respective storage containers and/or tanks to address potential safety concerns with the material.

Compatible waste materials are stored together in approved waste storage containers. Non-compatible wastes are to be segregated and not mixed (i.e., corrosive materials are stored separate from flammable materials) with other non-compatible waste materials.

### **3.3 Preventive Maintenance**

A preventive maintenance program is in place for equipment and storage containers containing environmentally sensitive materials. The maintenance and general operations checks pertaining to the elevators and emergency generators are conducted during the routine testing activities completed by approved RMU contractors. Any deficiencies noted during the check are to be identified and will be corrected. Completion of routine testing documentation by the RMU contractor will be used to document the routine inspections. Inspection forms and records are maintained by the RMU Maintenance Department. The operations and maintenance check shall include:

- A visual examination of equipment, storage containers, and containments for damage, defects, or deterioration.
- A check of vents (as applicable) for restrictions.
- A check of ancillary equipment for operational malfunctions.
- An investigation of conditions that may be a fire or safety hazard or pose an environmental hazard.
- Observation for evidence of a release of regulated substance.

Signs of deterioration, leaks which might cause a spill, and operational issues or defects identified during the monthly testing should be noted by the RMU contractor and brought to the attention of the EC and Senior Director, Maintenance and Plant Engineering.

Duquesne Light Co. conducts routine inspections of the transformers located on site and maintains associated inspection records.



### **3.4 Housekeeping Program**

- Small spills are quickly cleaned up with absorbent materials (pads, socks, pillows, loose absorbent, etc.) and collected for proper disposal.
- Specific areas of the facility have been designated for the storage of environmentally sensitive materials. Materials are stored in a neat, orderly fashion in approved containers which are compatible with the materials stored.
- Regular refuse pick-up and disposal is conducted.
- Regular inventory and disposal of hazardous or residual waste is conducted.

### **3.5 External Factors Planning**

Factors that could have serious impact on the public health and employees of the facility would be a fire or explosion. In the event of such an occurrence, the appropriate agencies would be immediately contacted. Flooding, power outages, or snowstorms would have minimal impact or effect on operations conducted at this facility.

### **3.6 Employee Training [40 CFR 112.7(f)(1)]**

Pertinent RMU personnel who are designated to act as the Emergency Coordinator and/or handle hazardous materials and related equipment will receive annual SPCC/PPC training and awareness training on this Plan. Annual training will provide a brief overview of general SPCC/PPC regulations, material handling procedures, spill response procedures, and routine inspections. The training will also include the contents of this Plan and the use, operation, and maintenance of spill prevention and response equipment. Spill response materials are located throughout the facility and personnel will receive training on the location and types of response materials that will be maintained in inventory by RMU.

Training records with adequate documentation are maintained for all employees. The Senior Director of Capital Projects and Safety will maintain copies of training records for a minimum of 3 years.

### **4.0 SPILL RESPONSE PROCEDURES [40 CFR 112.7(a)(3)(iv), (v)]**

This section provides spill response procedures for facility personnel to follow in the event of a small or large release, and information for containment, cleanup, and disposal practices that may apply in the event of a release. This section also provides site personnel with step-by-step site-specific spill contingency procedures to follow in the event of a spill or release at the facility.

#### 4.1 Spill Response Procedures

*When you discover a spill, determine whether the spill is small or large and whether you can respond to it.*

<b>A SMALL SPILL IS WHEN....</b>	<b>A LARGE SPILL IS WHEN....</b>
<p>Personnel can respond with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The EC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p> <p>Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p> <p><b><i>Follow the Small Spill Response Procedures on Page 14.</i></b></p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel and the environment. An example of this would be the rupture of an AST. This normally requires the assistance of an outside vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained for this and should not clean up large spills.</p> <p><b><i>Follow the Large Spill Response Procedures on Page 15.</i></b></p>

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## SMALL SPILL RESPONSE PROCEDURES

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### 4.1.1 Small Spill Response Procedures

If the spill is **SMALL** and **HAS NO OBVIOUS HEALTH THREATS** (fire, explosion, vapor, inhalation, etc.), then proceed as follows:

1. **STOP THE FLOW** of the spill or release immediately. Turn off all sources of ignition (e.g., motor vehicles, tractors, heaters, burners, electrical equipment). If you feel this action is too dangerous and may expose you to an obvious health threat (e.g., fire, explosion, and vapor inhalation), evacuate the area and report the spill as indicated below.
2. **NOTIFY THE EC** – See **Table 1** for notification protocol in the event of an emergency release.
3. **DETERMINE THE NECESSARY PROTECTIVE CLOTHING.** Always review the SDS sheets or NIOSH pocket guide to determine the necessary clothing to be worn prior to responding to a small spill. At a minimum, put on the following personal protective equipment:

- Safety Glasses
- Gloves
- Rubber Boots
- Protective Aprons.



4. **CONTAIN AND CONTROL THE VOLUME OF THE SPILL FROM SPREADING**
  - Place absorbent materials around the perimeter of the spill to prevent it from spreading.
  - Place absorbent materials on top of the spill to help reduce the volume.
5. **ABSORB THE REMAINDER OF THE SPILL**
6. **DISPOSE OF THE ABSORBED MATERIALS** in accordance with the RMU Waste Disposal Policy.
7. **COMPLETE and DOCUMENT THE RMU INCIDENT INVESTIGATION FORM** found on the **RMU SAFETY WEBSITE**.

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## **LARGE SPILL RESPONSE PROCEDURES**

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### **4.1.2 Large Spill Response Procedures**

If the spill is **LARGE** or **HAS OBVIOUS HEALTH THREATS** (fire, explosion, vapor, inhalation, etc.), then proceed as follows:

#### **8. EVACUATE THE AREA**

**9. NOTIFY THE EC.** See **Table 1** for notification protocol in the event of an emergency or release.

#### **10. CONTAIN THE SPILL**

In some situations, depending upon the nature and magnitude of the spill, it may be prudent to contain the spill before giving notification. If there is any potential of harm to human health from a fire, explosion, or vapor inhalation, evacuate the area and wait for the fire company and other emergency response members to show up. The following are steps to follow when trying to contain a spill:

- Immediately block off the entrance to storm/sewer inlets using sandbags, solid absorbent materials, soil, etc.
- Don PPE if coming in contact with or in the immediate area of the spill/release. Use absorbent materials to retard/stop flow of spill. Construct dikes around the area of spill using sand or soil if necessary.
- Establish fire-preventative measures in the vicinity of the spill.

#### **11. FURTHER INCIDENT NOTIFICATIONS**

The EC will determine the severity of the spill and, if necessary, will contact other agencies as identified on **Table 1**.

#### **12. COMPLETE and DOCUMENT THE RMU INCIDENT INVESTIGATION FORM found on the RMU SAFETY WEBSITE.**

### **4.2 Containment, Cleanup, and Disposal Practices for Spills**

A number of advanced response mechanisms are available for controlling oil and hazardous materials spills and minimizing their impacts on human health and the environment. The key to effectively combating spills is careful selection and proper use of the equipment and materials best suited to the type of spill and the conditions at the spill site.

#### **Containment**



**Only try to contain a spill if you can do so without placing yourself or others at risk for personal injury. USE PERSONAL PROTECTIVE EQUIPMENT.**

1. Attempt to stop or slow the source to prevent any further release:
  - Close valves and turn off power to pumps
  - Upright containers or roll them over so the hole is facing upward
  - Place leaking drums in compatible DOT-approved overpack drums
  - Patch holes or transfer material from a leaking container to another container
  - Move container to a location where it poses less of a threat.
  
2. Use absorbent materials or build a dike or dam to stop or slow the spread of the spill:
  - *Absorption* is a process in which sorbents such as sawdust, clays, charcoal, or synthetic products (i.e., pags, pillows, etc.) absorb or hold liquids. Sorbents can block or absorb a spill. The absorbent you select depends on the material spilled. Only use an absorbent that is marked as compatible with the hazard class of the spilled material (check the material's SDS for guidance).
  
  - *Dikes, dams, diversions, and retention* physically prevent or reduce the quantity of liquid flowing into the environment. Dikes or dams usually refer to earth, synthetic products (pags, pillows, etc.), or other barriers temporarily constructed to hold back the spill or leak. Booms, curtains, and skimmers are primarily used where a spill reaches water and divert (physically change) the direction in which the released materials flow. Sewers can also be blocked to keep materials from flowing into them.

### Cleanup



**You may be injured if you try to clean up a spill beyond your capability. Employees of the facility may follow the Small Spill Response Procedures on Page 14 of this Plan if the spill causes no obvious health threats (ex: leaking 55-gallon tank). The Emergency Coordinator must assess the threat and determine whether the cleanup can be performed in-house or if external contractor assistance is needed for a large spill (ex: rupture of a tank).**

Absorption, pumping, or industrial vacuuming can remove spills in secondary containment. If spills escape secondary containment, use one of the following methods to clean up the spilled material:

***Contaminant on or in Water:*** If material is floating on the surface of the water, use absorbents to skim it off. Store the waste in appropriate containers.



**Only attempt to clean contaminant out of water if it is a small, contained amount of water on an impervious surface. For larger amounts of water or if the contaminant is soluble in water, call a private contractor.**

***Contaminants on pervious surfaces (such as soil):*** Pump, drain, absorb, or scoop free-floating material into a container. Take care that flammable or combustible material is not processed in a manner that it can be ignited. Scoop or shovel contaminated media (soil, gravel, etc.) into a DOT-approved container for disposal, separating liquids from solids.

***Contaminants on impervious surfaces (such as concrete):*** Pump, drain, absorb, or scoop free-floating material into a container, separating liquids from solids. Take care that flammable or combustible material is not processed in a manner that it can be ignited. Soak up residual contaminants with absorbents and place them in a DOT-approved container for disposal.

- Outdoor cleanup – do not use wet cleaning methods (hot water or steam with or without detergent).
- Indoor cleanup – dry cleaning methods are preferred. Wastewater must be disposed by a contract vendor.

### **Disposal**

You must dispose of contaminated media, residue, and cleanup materials properly. All spill material is typically handled as waste, although in some instances recovered product can be reused. For hazardous waste, follow the facility handling, accumulation, and disposal requirements and/or consult with the EC.

#### **4.3 Disposal of Spill Residue**

The outcome of any spill cleanup is the disposal of the absorbent cleanup materials and/or soils contaminated from accidental spills. All cleanup materials should be handled as if it was a hazardous material.

Upon notification of a spill or release, cleanup operations also incorporate disposal as part of the procedure. Excavated soil may be stockpiled on plastic and covered securely until proper sample analysis can be completed to assist personnel in the classification and characterization for off-site disposal. Smaller amounts of contaminated soil, along with other sorbent materials may be placed into 55-gallon drums.

These drums may be disposed of by the external clean-up contractor or disposed through a contracted waste disposal company certified to handle and properly dispose of petroleum-contaminated waste materials.

The EC will direct site personnel to clean minor spills/releases caused through normal maintenance and facility operations. The EC will direct site personnel to clean up these small spills, using available absorbent materials rated for the type of material that has been spilled. Depending on the nature of spill and the amount of disposal residue generated, these absorbent materials may need to be disposed as a hazardous material. The contracted emergency response consultant will assist the EC on how the disposal residue should be handled.

If a minor spill or release occurs consisting of hazardous substances other than oil or petroleum products, disposal procedures will be the same as long as the substance can be absorbed quickly and efficiently without creating a risk to health or the environment. The EC will be responsible for notifying the external clean-up contractor for disposal of larger spills/releases cleanup residues.

#### 4.4 Spill Contingency Procedures for Potential Spill Areas

If there is a spill at a potential spill area described in Section 1.4 of this plan, go to the spill contingency procedure developed for that potential spill area and follow the directions.

Each of the following site-specific spill contingency procedures in combination with the Small and Large Spill Response Procedures beginning on page 14 of this Plan contains the following information:

- Spill response procedures.
- Name and phone number of the EC and Alternate EC.
- Diagram showing potential spill site and surface flow direction (see Figure 2 – Facility Layout and Surface Drainage Map).
- Secondary containment structures and drainage destinations.
- Types of materials present.
- Cleanup procedures.

If there is a spill at a location other than one of the identified potential spill sites, refer to the *General Spill Response Procedures* at the beginning of this section.

# Emergency Generators Spill Procedure

(Copy maintained at Maintenance Facility)

**CONTAINMENT:** The RMU Main Campus has twelve (12), diesel-fueled, emergency generator units staged inside and outside throughout campus. The generators utilize a diesel fuel tank that is located within the unit. A 269-gallon diesel fuel tank is utilized for the Washington Hall generator unit. The generator unit located outside on the south side of Lafayette Center contains a 366-gallon diesel tank. The generator unit located in the Patrick Henry generator building utilizes a 194-gallon diesel tank. Additional emergency generator units are located at Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Rockwell School of Business, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, the Wheatley Center, and the John Jay/Scaife Building.



**DRAINAGE:** If a spill were to occur at the tank within the generator unit behind Lafayette Center, the spill would most likely be contained within the unit but could possibly flow to the surrounding grassy area. If a spill were to occur at the tank within the generator units at Washington Hall, Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Rockwell School of Business, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, the Wheatley Center, or the John Jay Center/Scaife, the spill would most likely be contained within the unit but could possibly flow to the surrounding grassy area.



**TYPE OF MATERIAL PRESENT:**  
Diesel Fuel

*When you discover a spill, determine whether the spill is small or large and whether you can respond to it.*

A SMALL SPILL IS WHEN...	A LARGE SPILL IS WHEN...
<p>Personnel can respond with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The EC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel or the environment. This normally requires the assistance of an external vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained for this and should not clean up large spills.</p>



# Paints and Solvents Spill Procedure

(Copy maintained at the Facilities Service Center)

**CONTAINMENT:** The storage areas for paints and solvents are located inside the Facilities Service Center.

**DRAINAGE:** If a spill or release was to occur, it would be contained inside the buildings. No floor drains are located near the stored paint/solvents areas.

**TYPE OF MATERIAL PRESENT:**

- Paints
- Solvents

*When you discover a spill, determine whether the spill is small or large and whether you can respond to it.*

A SMALL SPILL IS WHEN...	A LARGE SPILL IS WHEN...
<p>Personnel can respond with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The EC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel or the environment. This normally requires the assistance of an external vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained for this and should not clean up large spills.</p>

# Transformers (Pad & Pole-Mounted) Spill Procedure

(Copy maintained at Facilities Service Center)

**CONTAINMENT:** The transformers are owned and maintained by Duquesne Light Co.

**DRAINAGE:** If a spill or release was to occur, a spill would flow to the concrete, asphalt, or grassy area surrounding the transformers depending on the location (refer to Figure 2 – Facility Layout and Surface Drainage Map for location of each transformer).

**TYPE OF MATERIAL PRESENT:**  
Transformer Oil (Non-PCB)

*When you discover a spill, determine whether the spill is small or large and whether you can respond to it. Immediately notify Duquesne Light Co. at 412-471-3875.*

<b>A SMALL SPILL IS WHEN...</b>	<b>A LARGE SPILL IS WHEN...</b>
<p>Personnel can respond with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The EC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel or the environment. This normally requires the assistance of an external vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained for this and should not clean up large spills.</p>

# Hydraulic Fluid for Elevators Spill Procedure

(Copy maintained at Facilities Service Center)

**CONTAINMENT:** The hydraulic fluid is stored inside elevator workings in each elevator shaft throughout the campus.

**DRAINAGE:** If a spill or release was to occur, a spill would be contained inside each elevator shaft or the surrounding concrete area.

**TYPE OF MATERIAL PRESENT:**  
Hydraulic Fluid

*When you discover a spill, determine whether the spill is small or large and whether you can respond to it.*

<b>A SMALL SPILL IS WHEN...</b>	<b>A LARGE SPILL IS WHEN...</b>
<p>Personnel can respond with available response equipment and personnel resources without endangering the welfare of personnel or endangering the environment. Personnel who use and handle such chemicals as part of their department operations are authorized to clean up small spills. The EC may identify personnel to clean up small spills, such as a spill in a lab or leak from a 55-gallon drum, that do not present any obvious health risks (fire, explosion, inhalation, etc.). Follow the small spill response procedures in this section.</p> <p>Site personnel can clean up small spills that do not present any obvious health risks (fire, explosion, inhalation, etc.).</p>	<p>Personnel cannot respond to a spill or release without endangering the welfare of personnel or the environment. This normally requires the assistance of an external vendor/contractor who is trained in responding to a large spill emergency.</p> <p>Most site personnel are not trained for this and should not clean up large spills.</p>

## **5.0 COUNTERMEASURES**

### **5.1 Countermeasures Undertaken by the Site**

- In the event of a spill or major leak of an environmentally sensitive material, the first priority is to attempt to stop the cause of the spill/release. This must be performed using the proper precautions and appropriate personal protective equipment. If the material is unknown, attempt to identify the material by labels, placards, other markings, etc.
- Once the material is identified, appropriate measures must be implemented (with proper protection for workers) to stop the spread of the spill and to prevent it from entering any drains or waterways. Use spill kits (pads, socks, pillows, blankets, and loose absorbent) to control smaller spills. Place absorbent materials in a fashion that will prevent the material from migrating any further. In the event of a large spill, use of equipment, shovels, and other appropriate tools to move sand or other material to construct a dike/containment structure will help to collect the material and prevent further spread or flow into any drainage system.
- If a material spills near a drain/inlet, use drain stopper mats to prevent the material from entering the drain/inlet.
- If material gets into a waterway, prevent the material from getting further downstream by placing booms across the entire width of the waterway (at a point downstream from the spilled material), preferably at a narrow point. Use absorbent pads to absorb material that may be floating on the surface of the water.
- If material spills in an area with secondary containment, ensure valves are closed on the containment structure and collect spilled material with absorbents. Once the material has been absorbed, collect used absorbents (pads, pillows, socks, blanket, etc.) and place in an empty, approved, 3-ringed, 55-gallon drum for appropriate waste inventory and proper disposal.
- After a spill has been contained and the immediate emergency has been brought under control, cleanup of the spill material should be initiated. Use appropriate equipment, as necessary, to complete cleanup. If material has spilled on soil, remove any stained soil. Use of proper personal protective equipment, such as protective suits, gloves, safety glasses, coveralls, etc., must be worn to protect the employee. After cleanup, decontamination of equipment must be completed. Spill kits and absorbent materials must be restocked.

### **5.2 Emergency Response Contractor(s)**

In the event of a spill/release that poses a threat to humans and/or the environment, the first emergency response contractor that should be contacted is Moon Township, by dialing 911.

The contractors for inventory, collection, removal, and proper disposal of the various wastes internally contained on the site, such as used oil, are identified below and in Table 1:

- |  |   |
|--|---|
| 1. Clean Harbors<br>1-800-645-8265 (24-hr) | 2. Heritage Environmental<br>330-385-7337 (24-hr) |
|--|---|

In the event that RMU personnel cannot resolve an emergency situation, the local emergency response team may be contacted by dialing 911. This is done at the discretion of the EC.

### **5.3 Internal and External Communication and Alarm Systems**

External and internal communications equipment made available for staff and students on campus include landline phones, cellular phones, two-way radios, and e-mail. Buildings are equipped with fire alarm systems, and duress alarms are located throughout campus.

### **5.4 Evacuation Plan for Site Personnel**

An audible alarm, such as a fire alarm or verbal communication, will be sounded in the event of an emergency requiring evacuation of the building. Portable fire extinguishers are located throughout the building. Diagrams of evacuation plans will be posted at every entrance/exit in the facility.

The Public Safety Department ensures that order is maintained during evacuations. Horizontal and/or vertical evacuation procedures will be followed as necessary in the event of an evacuation. Office personnel shall exit through the closest doors (if possible) or other appropriate exit and proceed to the designated safe area. After the building evacuation is completed, the Public Safety Department will give employees permission to return to their respective work areas.

### **5.5 Emergency Response Equipment**

The facility may have spill response equipment available to allow site personnel to respond safely and quickly to emergency situations. Some examples of spill response equipment are portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas, or dry chemicals), spill control equipment, decontamination equipment, and emergency tool and patching kits.

Spill response equipment and supplies are maintained for immediate use inside the Maintenance Facility and at select locations throughout campus.

All equipment is maintained as necessary to assure its proper operation in time of emergency. After an emergency, all equipment must be decontaminated, cleaned, and fit for its intended use before normal operations resume. Spill kits are to be restocked.

Reusable equipment used in an emergency will be decontaminated thoroughly on-site and placed back into service. Emergency equipment is periodically checked to ensure it is in operating condition is in place. Spill kits are periodically restocked, and absorbent materials are available at all times. The emergency equipment outlined in **Table 4** will be routinely inspected and maintained by facility personnel.

Examples of spill response equipment and supplies that should be available to personnel at the facility are listed in **Table 4 – Emergency Response Equipment and Supplies**.

**TABLE 4 - EMERGENCY RESPONSE EQUIPMENT AND SUPPLIES**

<i>Emergency Equipment</i>	<i>Equipment Storage Locations</i>
Spill Kit (absorbent material)	Laboratories and Facilities Service Center
Fire Extinguishers	In All Buildings
First Aid Kit	Laboratories and Facilities Service Center
Eye Wash Stations & Emergency Showers	Throughout Campus
Communication Equipment	Throughout Campus
Two-way Radios	Facilities Service Center
Hand Tools (Shovels, etc.)	Garage and Sheds
Emergency Generators	Throughout Campus
Air Compressor	Facilities Service Center
Chain Saw	Facilities Service Center
Chemical Neutralizers	Laboratories
Portable Lighting	Facilities Service Center

## **5.6 Emergency Assistance, Response, and Reporting**

The specific reporting time periods and the information required to be communicated when reporting a spill is contained within this section and Section 1.2.4. In addition, this section and Section 1.2.4 contain steps to follow for written notice requirements to the PADEP and the Moon Township Municipal Authority.

Refer to Section 2.2 for emergency assistance contacts you may use in the event of an emergency. The EC should familiarize themselves with **Table 1 – List of Emergency Contacts**, and the regulatory response requirements that are spelled out in this section.

### **5.6.1 Response and Reporting**

During an emergency, the EC must take all reasonable measures necessary to ensure that fire, explosion, emission, or discharge do not occur, reoccur, or spread to other materials or wastes at the facility. These measures shall include where applicable, stopping mechanical processes and operations, collecting and containing released materials or wastes, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, emission, or discharge, the EC must ensure that adequate monitoring is conducted for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

Immediately after a reportable spill/release, the EC, with the PADEP approval, must provide for treating, storing, or disposing of residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the facility.

The EC must insure that in the affected areas of the facility, no material or waste incompatible with the emitted or discharged residues is processed, stored, treated, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the Plan is cleaned and fit for its intended use before operations are resumed.

The EC will within 14 days of the initial reportable release, submit a written report on the incident to the PADEP. The report must include the following:

1. Name, address, and telephone number of the individual filing the report;
2. Name, address, and telephone number of the facility;
3. Date, time, and location of the incident;
4. A brief description of the circumstances causing the incident;
5. Description and estimated quantity by weight or volume of materials or wastes involved;
6. An assessment of any contamination of land, water, or air that has occurred due to the incident;
7. Estimated quantity and disposition of recovered materials or wastes that resulted from the incident; and
8. A description of what actions the installation intends to take to prevent a similar occurrence in the future.

#### **5.7 Downstream Notification Requirements for ASTs**

The downstream notification requirement is not applicable for this facility since the aggregate above-ground storage tank capacity of regulated substances does not exceed 21,000 gallons.

## **6.0 SITE INSPECTION AND OPERATIONAL PROCEDURES**

This section contains information on inspecting systems in areas identified as potential spill areas and corresponding standard operating procedures (SOPs) for inspecting these systems.

### **6.1 Site Inspection and Monitoring Program [40 CFR 112.7(e)]**

By focusing on site security and early detection of system failures, the inspection program detects and prevents system malfunctions, equipment deterioration, and operator errors. Inspections must occur frequently enough to alert site personnel before a serious problem develops. Engineering knowledge and operational experience with the systems and processes involved determine the exact inspection schedule.

General inspections of the tanks include monthly visual inspections for leaks and corrosion during the monthly emergency generator and elevator operational testing conducted by the approved RMU contractor. Paint/solvent storage areas are visually inspected on a regular basis for spills/leaks. Duquesne Light Co. inspects and maintains the pad-mounted transformers located throughout campus. If RMU identifies an issue with one of the transformers, the EC will contact Duquesne Light Co.

### **6.2 Bulk Storage Tank Testing and Inspections**

The facility has twelve emergency generators with built-in diesel fuel tanks associated with Washington Hall, Lafayette Center, Concord Hall, Salem Hall, the Athletic Building/Joe Walton Stadium, the Rockwell School of Business, the Facilities Service Center, Franklin Center, Hale Center, Patrick Henry Center, Wheatley Center, and the John Jay Center/Scaife. In addition to the regular visual inspection during the emergency generator testing, the generators will be serviced as needed when the visual inspections reveal repairs are needed. The servicing of the tanks will be done by an external contractor and will include integrity testing when material repairs are made. All testing will be completed according to the manufacturing specifications, industry standards, and good engineering practices.

### **6.3 Site Operational Procedures for Preventing Spills (SOPs) [40 CFR 112.7(e)]**

#### **6.3.1 Preventing Site Spills SOP**

These basic guidelines will be followed to prevent a release from occurring on-site:

##### **Store Chemicals Properly**

- Properly store and label chemicals in their appropriate containers.
- Keep containers of incompatible materials stored separately and orderly.
- Keep hazardous materials and hazardous waste accumulation areas clean and orderly and a safe distance from areas where there is common interaction with the general public.
- Post warning signs that are visible from 50 feet.



### **Use Secondary Containment**

- Place drip pans and absorbent pads under leaking vehicles.
- Ensure stored bulk chemicals have secondary containment.

### **Use Spill Kits**

- Maintain enough sorbent, equipment, and prevention tools for small spills.
- Maintain an SDS for each hazardous material and keep the Combined Plan readily available.

## **6.4 Additional Regulatory Requirements [40 CFR 112.7 and 8]**

The following regulatory requirements supplement the procedures and protocols detailed in this plan:

**40 CFR 112.7 (c)** - Appropriate containment and/or diversionary structures or equipment is provided to prevent a discharge. The entire containment system, including walls and floor, is capable of containing chemicals and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. This secondary containment is achieved by the use of dikes, berms, or retaining walls sufficiently impervious to contain chemicals and curbing/drip pans.

**40 CFR 112.7(i)** – Appropriate action will be taken as necessary if a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe or has discharged oil or failed due to brittle fracture failure or other catastrophe. The container will be evaluated for risk of discharge or failure due to brittle fracture or another catastrophe.

## **7.0 PLAN MANAGEMENT**

### **7.1 Amendments by EPA (40 CFR 112.4)**

This Plan will be amended if, after review by the EPA Regional Administrator, it is judged that the information contained herein does not meet the requirements of 40 CFR 112 or an amendment is necessary to prevent and contain discharges from the Facility. The University will make every effort to work in cooperation with state and federal agencies as part of their continued commitment to implement safeguards to protect the environment.

### **7.2 Amendments by Owner/Operator (40 CFR 112.5)**

If there are changes at the facility (either design, construction, operation, or maintenance) which affect the facility's potential for the discharge of oil or other regulated substances, this Plan will be amended within 6 months from the date of the review.

The reviews and updates are recorded in the Record of Reviews presented in Section 7.3.

### 7.3 Record of Reviews

The Senior Director of Capital Projects and Safety shall complete a review and evaluation of this Plan at least once every five (5) years, or when changes are made to the facility that affect this Plan. As a result of this review and evaluation, the Plan will be amended within six (6) months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. A Plan Review Tracking Log is provided in **Appendix B** of this Plan.

### 7.4 Implementation Schedule for Plan Elements

Action items are listed in the Implementation Schedule below. A column is provided for the facility’s Senior Director of Capital Projects and Safety to enter the date that each action item is completed. Completed action items will be removed from the list at the next Plan revision.

**TABLE 5  
ACTION ITEM IMPLEMENTATION SCHEDULE**

Action Item	Responsible Person	Projected Completion Date	Date Completed
When replacing elevators/elevator equipment, install double walled oil reservoirs/tanks or other containment system		As elevator upgrades are scheduled	

## **8.0 SUMMARY OF PLAN COMPLIANCE WITH EPA REGULATIONS**

This section contains information regarding RMU compliance with various EPA regulations regarding facility spill prevention programs.

### **8.1 Combined Plan Review**

#### **8.1.1 On-Shore Facilities – 112.7[c][1]**

RMU relies primarily on the facility building enclosures as secondary containment for bulk water treatment chemicals, hydraulic fluid for elevators, paints and solvents, and minimal quantities of chemicals in the science laboratories. Water treatment chemicals are predominantly staged on secondary containment pallets inside of Patrick Henry Center and Washington Hall. The diesel fuel tanks associated with the on-site generators are single walled and enclosed within each generator unit, which minimizes the likelihood of a release. **Table 5** includes an action item for secondary containment to be provided for the elevator hydraulic fluid reservoirs as elevator upgrades are scheduled.

#### **8.1.2 Off-Shore Facilities – 112.7[c][2]**

Not applicable.

### **8.2 Demonstration of Practicability – [40 CFR 112.7(d)]**

Section 8.3 details the engineering controls used to prevent spills of oil-containing materials or other pollutants from reaching navigable waters of the United States. RMU management has determined that the use of containment measures and diversionary structures or readily available response materials can be effective in preventing discharged oil from reaching navigable waters at this facility. However, secondary containment for the 12 emergency generators and 16 pad-mounted transformers at the facility was not considered practicable. Since the facility has not had discharges from any oil-filled operational equipment exceeding 1,000 gallons or two discharges from any oil-filled operational equipment exceeding 42 gallons within any twelve-month period in the last three years, the facility meets the requirements listed in 40 CFR 112.7(k)1 to implement the alternate requirements listed in 40 CFR 112.7(k)2 in lieu of general secondary containment.

The RMU Main Campus has established procedures for inspections and a monitoring program to detect equipment failure or discharge, an oil spill contingency plan, and a written commitment of manpower, equipment, and materials to expeditiously control and remove any quantity of oil discharged that may be harmful, as part of this Plan. **Section 9.0 of this Plan serves as the Oil Spill Contingency Plan for the facility.** Several outside sources (e.g., local fire and police departments) have also been identified to assist in spill response if needed. These outside sources are aware of facility activities and storage of oils and other chemicals through the RMU's Community Right-to-Know Plan, which is maintained separately.

### **8.3 Engineering Design and Operating Practices to Prevent Site Spills**

This section identifies various engineering controls and operating procedures incorporated to prevent spills.

### **8.3.1 Bulk Storage Tanks – [40 CFR 112.8(c)]**

The main campus of RMU has oil-containing operational equipment and other bulk material storage as detailed in **Table 2 – Material and Waste Inventory**.

#### **Compatibility of Bulk Storage Containers and Material Stored – 112.8[c][1]**

The facility does not have bulk storage containers. All oil-filled mechanical and electrical equipment at the facility have been designed to be compatible with the liquids that they contain. The emergency generator diesel fuel tanks have been designed with thermal and corrosion protection and are suitable for the pressure and temperature conditions that each encounter. All oil-containing operational equipment is operated within the temperature and pressure ranges specified by the manufacturer.

#### **Secondary Containment – 112.8[c][2]**

RMU relies primarily on the facility building enclosures as secondary containment for bulk water treatment chemicals, hydraulic fluid for elevators, paints and solvents, and minimal quantities of chemicals at the science laboratories. Emergency generator units located outside throughout campus utilize diesel fuel tanks enclosed within the units. As noted in Section 8.2, the emergency generators and pad-mounted oil-filled transformers (owned and maintained by Duquesne Light Co.) meet the qualification criteria in 40 CFR 112.7(k)1. Secondary containment for the emergency generators and pad-mounted transformers has been deemed impractical; therefore, RMU has opted to implement the alternate requirements listed in 40 CFR 112.7(k)2 in this Plan in lieu of general secondary containment.

#### **Buried Metallic Storage Tanks – 112.8[c][4]**

The facility does not contain any buried tanks.

#### **Partially Buried Metallic Storage Tanks – 112.8[c][5]**

The facility does not contain any partially buried tanks.

#### **Periodic Integrity Testing for ASTs – 112.8[c][6]**

All oil-containing tanks/reservoirs associated with the elevators and diesel generators will be visually inspected periodically and following any material repairs for signs of deterioration, discharges, or accumulation of material inside the building, elevator shaft, generator unit, or containment. Elevators and diesel generators are routinely inspected by external contractors that specialize in installation, repair, and maintenance of such equipment and regularly test and service the equipment. Inspection and test records are maintained by the Senior Director of Maintenance and Plant Engineering in the Facilities Operations Office.

Duquesne Light Co. inspects and maintains the pad-mounted transformers located throughout campus. If RMU identifies an issue with one of the transformers, the EC will contact Duquesne Light Co.

### **Internal Heating Coils – 112.8[c][7]**

Not applicable. The facility does not have internal heating coils.

### **Fail-Safe Engineering on ASTs – 112.8[c][8]**

Not applicable. The facility does not have bulk storage containers.

### **Water Discharge Facilities – 112.8[c][3]**

The facility does not have diked areas which accumulate rainwater and need to be periodically discharged to maintain full containment capacity. Should diked areas be permanently installed in the future or constructed temporarily, the facility will abide by the requirements of 40 CFR 112.8(c)(3).

### **Correction of Any Tank Deficiencies – 112.8[c][10]**

If the integrity of the elevator hydraulic fluid or generator diesel tanks are in jeopardy (e.g., visible leaks of tanks and piping associated with the equipment), the necessary steps will be taken to correct the problem. This would include removing the elevator or generator unit from service and contacting the appropriate external contractor to evaluate the deficiency and follow the necessary protocol to repair the equipment.

## **8.3.2 Hazardous Materials Storage Containers**

The facility does not routinely generate or store hazardous waste. Any hazardous waste items generated due to spill response/cleanup activities will be properly labeled, handled, and disposed by one of the external emergency response contractors listed in **Table 1**.

## **8.3.3 Buried Piping Protected Against Corrosion – 112.8[d][1]**

The facility does not have buried piping associated with bulk storage containers.

### **Out-of-Service Pipes Capped – 112.8[d][2]**

The EC will mark the origin of the piping in the event of any piping being capped or removed from service, as applicable.

### **Pipe Supports Design – 112.8[d][3]**

The facility does not have piping or pipe supports associated with bulk storage containers.

### **Inspection of Aboveground Piping and Valves – 112.8[d][4]**

Site inspection personnel will conduct regular inspection of all surface piping and drainage valves, as applicable.

### **Signs To Warn Vehicles About Piping – 112.8[d][5]**

Not applicable. The facility does not have piping associated with bulk storage containers.

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#### **8.3.4 Facility Tank Car and Tank Truck Loading/Unloading Rack – [40 CFR 112.7(h)]**

Not applicable. The facility does not perform tank car or tank truck loading/unloading activities.

#### **8.3.5 Site Inspections and Site Records of Potential Spill Areas – [40 CFR 112.7(e)]**

The facility has instituted a procedural inspection program for all potential spill areas. RMU's Main Campus will maintain written records of all inspections of potential spill areas for a minimum of three years. Records are located in the Facilities Maintenance Office. For protocol to follow regarding inspections of potential spill areas, refer to Section 6.0.

#### **8.3.6 Personnel Training and Spill Prevention Procedures – [40 CFR 112.7(f)]**

##### **Personnel Training – 112.7[f][1]**

Refer to Section 3.6 for training program details.

##### **Responsibilities – 112.7[f][2]**

Refer to Section 2.0 for information on responsibilities of personnel.

##### **Spill Plan Training – 112.7[f][3]**

Refer to Section 3.6 for training program details.

## **9.0 OIL SPILL CONTINGENCY PLAN**

### **9.1 Introduction**

This Oil Spill Contingency Plan is prepared in accordance with 40 CFR 112.7(d) and 40 CFR 109 to address oil releases where secondary containment is impracticable. Areas of the site where secondary containment is not practicable include the emergency generator units and Duquesne Light Co. transformer pads.

This Contingency Plan defines the procedures and tactics for responding to discharges of oil from the noted operations (above) into navigable waters or adjoining shorelines of the United States.

This Contingency Plan is implemented whenever a discharge of oil has reached or threatens, navigable waters or adjoining shorelines. Additionally, other substances used at the facility may have to be reported if a release of the substance is equal to, or greater than, the reportable quantity (RQ) for that substance.

This Contingency Plan generally follows the content and organization of 40 CFR 109 and describes the distribution of responsibilities and basic procedures for responding to an oil discharge and performing cleanup operations.

Utilizing facility resources and/or contracted resources, RMU is committed to provide the manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

#### **9.1.1 Resources at Risk**

Ohio River, which is located in proximity to this facility, has the potential to be impacted during a spill. Refer to Section 1.2.1 for a description of facility drainage.

The facility is located within proximity to various commercial/industrial facilities, public meeting locations, and other public resources which could be at risk during an incident. The facility will coordinate with the local fire department, police, and with its residential neighbors, to provide the appropriate warnings in the event of a discharge that could affect public health and safety.

#### **9.1.2 Risk Assessment**

Potential spill sources are outlined in **Table 2** and **Table 3**. Potential spill areas are further expanded upon in Section 4.4 of this Plan.

#### **9.1.3 Response Strategy**

Facility personnel and external contractors are equipped and trained to respond to spills confined at the facility. Section 5.0 outlines the countermeasures that will be taken by facility personnel in response to a spill.

This Plan addresses all discharge incidents, including those that affect navigable waters or during which oil cannot be safely controlled by facility personnel. Response to such incidents will likely require the assistance of outside contractors to contain and clean-up the released oil. Countermeasures to be undertaken by contractors are provided in Section 5.0 of this plan, and a

list of spill responders is located on **Table 1**. The key response strategy will be to limit migration of spilled oil to minimize offsite impacts and impacts to surface waters.

## **9.2 Spill Discovery and Response**

### **9.2.1 Distribution of Responsibilities**

RMU has the primary responsibility for providing for the initial response to oil discharge incidents originating from this facility. To accomplish this, RMU has designated the responsible Emergency Coordinator. Those qualified to perform the role of Emergency Coordinator are listed on **Table 1**.

The duties of the Emergency Coordinator during an emergency event are outlined in Section 2.3. The Emergency Coordinator has the authority to commit the necessary resources to respond to the discharge and to request assistance from local fire department, police department, contractors, or other responders, as appropriate.

### **9.2.2 Response Activities**

In the event of a discharge, the first priority is to stop the product flow and to shut off all ignition sources followed by the containment, control, and mitigation of the discharge. Section 4.0 provides a breakdown of the actions to be performed to respond to an oil discharge. Guidance is provided in Section 1.2.4 and **Table 1** to determine when notifications must be made.

## **9.3 Response Resources and Preparedness Activities**

### **9.3.1 Equipment, Supplies, Services, and Manpower**

Facility personnel and/or contractors will be able to respond to and contain most minor discharges (55 gallons or less) occurring at the facility, and initially mitigate a major discharge while waiting for additional material or support from outside contractors. Spill response equipment at the facility is listed in **Table 4**.

This Plan is designed to address releases from sources covered under 40 CFR 112.7, including potential spill areas outlined in **Table 3**. The most likely spill event from these spill sources is not anticipated to exceed 50 gallons. The response materials required to contain a “most-likely” release of 50 gallons or less would include those outlined in **Table 4**.

Facility personnel are trained on spill response procedures in accordance with this Plan. To respond to larger discharges and ensure the removal and disposal of cleanup debris, RMU has established working relationships with spill response contractors, as described in Section 5.0 and **Table 1**. These contractors have access to additional resources such as personnel, equipment, and materials.

### **9.3.2 Access to Receiving Water Bodies**

In the event of a spill, if the spilled material is not able to be contained it will likely migrate to one of the storm water catch basins located throughout the paved areas of the facility, which ultimately drain to the storm water collection system for Moon Township. Should oil make it to one of these inlets, the necessary notifications will be made, and response efforts will be coordinated to identify a point downstream to deploy containment materials to capture spilled material.



### **9.3.3 Communications and Control**

Procedures for spill notification are provided in Section 1.2.4 and **Table 1**. In the event of a spill, the person discovering the spill will notify the Emergency Coordinator. Spill notifications will be made in accordance with the procedures in Section 1.2.4.

### **9.3.4 Training Exercises and Updating Procedures**

RMU has established and maintains an on-going training program to ensure personnel responding to oil discharges are properly trained and that all necessary equipment is available. Section 3.6 of this Plan outlines the training procedures in accordance with 40 CFR 112.7. Following a response to an oil discharge, the Emergency Coordinator will evaluate the actions taken and identify procedural areas where improvements are needed. As necessary, the facility amends the Plan to reflect changes made to the facility equipment and procedures. A Professional Engineer will certify any technical amendment to the Plan.

## **FIGURES**









# ROBERT MORRIS UNIVERSITY

6001 UNIVERSITY BLVD.  
MOON TOWNSHIP, PA 15108

All visitors must visit the Police Department for parking information.

**POLICE / EMERGENCIES**  
412-397-2424

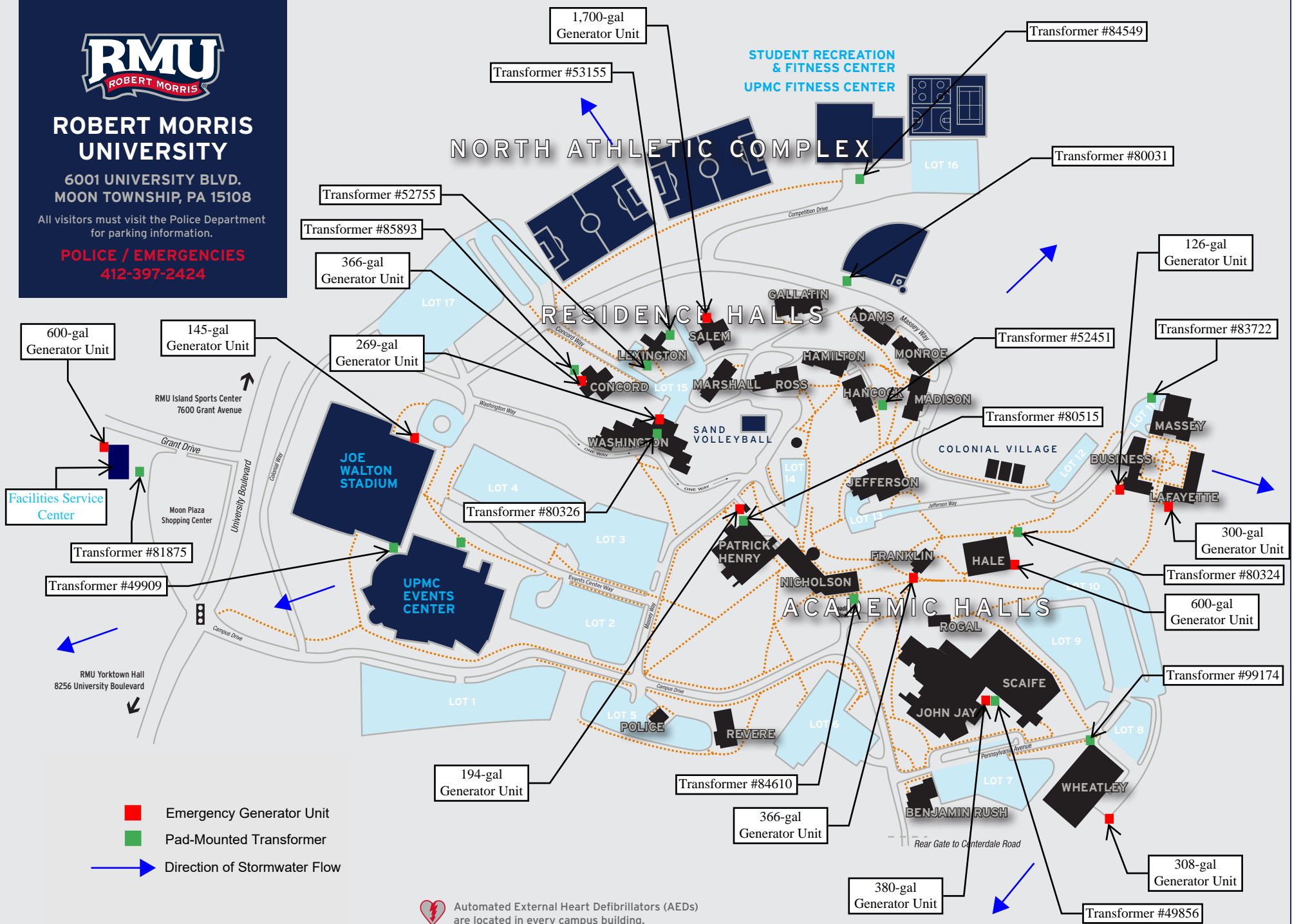


FIGURE 2. FACILITY LAYOUT AND SURFACE DRAINAGE MAP

Updated January 2024

## **APPENDIX A**

### **SAFETY DATA SHEETS**

**(SDS ARE MAINTAINED BY DEPARTMENTS & FACILITIES  
MANAGEMENT SAFETY AT RMU WEBSITE: [SAFETY SERVICES |  
ROBERT MORRIS UNIVERSITY \(RMU.EDU\)](http://www.rmuedu.edu/safety-services))**

**APPENDIX B**

**PLAN REVIEW TRACKING LOG**



**APPENDIX C**  
**DISCHARGE NOTIFICATION FORMS**





## VERBAL DISCHARGE NOTIFICATION FORM

Discharge Information (page 1 of 2)	
<b>General Information When Reporting a Spill to Outside Authorities:</b>	
<b>Name:</b>	Robert Morris University – Main Campus
<b>Address:</b>	6001 University Boulevard Moon Township, PA 15108
<b>Telephone:</b>	412-397-3000
<b>Owner/Operator:</b>	Robert Morris University 6001 University Boulevard Moon Township, PA 15108
<b>Primary Contact:</b>	Tim Kirsch Senior Director, Capital Projects and Safety Work – (412) 397-6282 Cell (24 hrs) – (412) 812-1134
<b>Type of Oil:</b>	<b>Discharge Date and Time:</b>
<b>Quantity Released:</b>	<b>Discovery Date and Time:</b>
<b>Quantity Released to a Water body:</b>	<b>Discharge Duration:</b>
<b>Location/Source:</b>	
<b>Actions taken to stop, remove, and mitigate impacts of the discharge:</b>	
<b>Affected Media:</b>	
<b>Notification Person:</b>	<b>Telephone Contact:</b> Business: 24 hr:
<b>Nature of discharges, environmental/health effects, and damages:</b>	
<b>Injuries/fatalities:</b>	
<b>Evacuation required?</b>	



<b>Notification Checklist (page 2 of 2)</b>		
	<i>Date &amp; Time</i>	<i>Name of Person Receiving Call</i>
<b>Discharge in Any Amount</b>		
Tim Kirsch Title: Senior Director, Capital Projects and Safety Work – (412) 397-6282 Cell – (412) 812-1134		
<b>Discharge more than 5 gallons and not affecting a water body or groundwater</b>		
Moon Township Fire Department: 911		
Allegheny County Emergency Services (412) 473-2550		
PADEP Environmental Emergency (800) 541-2050		
<b>Discharge in any amount affecting (or threatening to affect) a water body</b>		
National Response Center (800) 424-8802		
Moon Township Fire Department: 911		
PEMA (717) 651-2001		
Allegheny County Emergency Services (412) 473-2550		



WRITTEN FOLLOW-UP DISCHARGE NOTIFICATION

PENNSYLVANIA WRITTEN FOLLOW-UP DISCHARGE INFORMATION	
<b>1. WHO</b>	
<b>Facility Name:</b>	Robert Morris University – Main Campus
<b>Facility Address:</b>	6001 University Boulevard Moon Township, PA 15108
<b>Telephone:</b>	412-397-3000
<b>Owner/Operator:</b>	Robert Morris University 6001 University Boulevard Moon Township, PA 15108
<b>Primary Contact:</b>	Tim Kirsch Senior Director, Capital Projects and Safety Work – (412) 397-6282 Cell (24 hrs) – (412) 812-1134
<b>2. WHEN</b>	
<b>Date of discharge:</b>	<b>Time of Discharge:</b>
<b>Duration of Discharge:</b>	
<b>Date of Discovery of Discharge:</b>	<b>Time of Discovery of Discharge:</b>
<b>Actions taken to stop, remove, and mitigate impacts of the discharge:</b>	
<b>Spill Number assigned by PADEP:</b>	
<b>If National Response Center was notified; their case number:</b>	
<b>3. LOCATION</b>	
<b>Location of facility from which release or discharge occurred:</b> Robert Morris University – Main Campus – Allegheny County 6001 University Boulevard Moon Township, PA 15108	
<b>Latitude and Longitude of Release (if known):</b>	
<b>Distance and direction from nearest intersection (or milepost if transportation-related release):</b>	
<b>4. PRODUCT RELEASE</b>	
<b>Common and technical name of material released:</b>	
<b>Quantity of discharge:</b>	<b>Duration of discharge:</b>



<b>PENNSYLVANIA WRITTEN FOLLOW-UP DISCHARGE INFORMATION</b>
<b>5. ENVIRONMENTAL IMPACT</b>
<b>Affected Media:</b>
<b>Length of area of navigable waterway affected:</b>
<b>Ground surface area (ft<sup>2</sup>) and depth of soil contamination:</b>
<b>Damage to wildlife and vegetation:</b>
<b>Impact to human health and safety:</b>
<b>Medical advice provided for exposed individuals (and/or local medical personnel):</b>
<b>6. MONITORING AND DETECTION</b>
<b>If the release or discharge was monitored, indicate the method of detection and concentrations detected:</b>
<b>If the release was airborne, how was the wind direction and speed determined?</b>
<b>Was the public warned, and if so, how?</b>
<b>7. MITIGATION, CONTAINMENT ACTION</b>
<b>How much product or waste was recovered or neutralized?</b>
<b>How was the material recovered or neutralized?</b>
<b>Were there any other actions taken to reduce the impact of the discharge (containment, absorbents, on-site treatment, etc.)?</b>
<b>8. PREVENTION MEASURES</b>
<b>Provide plans to prevent recurrence of the discharge that may occur at this specific source. This may include employee training, replacement of equipment, construction, or security measures such as lighting, fencing of locks.</b>
<b>9. HEALTH RISKS</b>
<b>List known or anticipated acute or chronic health risks associated with the substances that were released.</b>