Spill Prevention, Control, and Countermeasure Plan

Kennesaw State University

Marietta Campus

1100 South Marietta Parkway

Marietta, Cobb County, Georgia

In case of emergency or spill, go to Section 5.4 for Spill Reporting Information and Appendix N for Emergency Contacts

June 8, 2023
Terracon Project No. 49237099

Prepared for:
Kennesaw State University
Marietta, Georgia

Prepared By:
Terracon Consultants, Inc.
Kennesaw, Georgia

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Kennesaw, Georgia 30144
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June 8, 2023

Kennesaw State University
1200 Chastain Road NW
Kennesaw, GA 30144

Attn: Mr. Terran Terrell, MPH
P: (470) 578-5026
E: tterrel7@kennesaw.edu

Re: Spill Prevention Control and Countermeasure Plan Update
Kennesaw State University
Marietta Campus
1100 South Marietta Pkwy
Marietta, GA 30060
Terracon Proposal No. 49237099

Dear Mr. Terrell:

Please find enclosed the updated Spill Prevention, Control, and Countermeasure (SPCC) Plan prepared by Terracon Consultants, Inc. (Terracon) for the Kennesaw State University Marietta Campus. This SPCC Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations,* Part 112 (40 CFR 112) and supersedes earlier SPCC Plans prepared for this campus. The purpose of this SPCC Plan is to describe measures implemented by Kennesaw State University (KSU) at the Marietta Campus to prevent oil discharges from occurring and to prepare the campus to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

SPCC Recommendations
Based on Terracon's site reconnaissance visit completed on March 31, 2023, the following was observed and is recommended. These items observed should not prevent the updated SPCC Plan from being signed and certified by a Professional Engineer (P.E.), however, it is recommended they be investigated further and/or followed up on.

- A spill kit containing sorbent materials, drain covers, diversion barriers, etc. should be placed near the bulk cooking oil tanks at the Stingers Dining Hall and accessible in the event of a spill from the tanks or the associated aboveground piping connecting the tanks to the fryers inside the kitchen.

- A stormwater inlet was observed approximately 20 feet downgradient from the two 650-gallon aboveground storage tanks (ASTs) located at the Facilities Grounds and Vehicle Shop. It is recommended that this inlet be protected during transfer activities from the tanker trucks into the ASTs to reduce the likelihood of oil entering the stormwater conveyance system in the event of a spill. Such protection could include placing absorbent pads in a semi-circle around the inlet, utilizing a magnetic inlet cover during transfer operations, etc.

Please review the SPCC Plan for other required procedures to verify that it is consistent with other campus plans and programs.

Oil Spill Contingency Plan
Qualified oil-filled operational equipment are associated with this facility (i.e. piping, cooking oil tanks, and transformers). Due to a lack of secondary containment structures for some of this equipment, an Oil Spill Contingency Plan was prepared. Elements of the Oil Spill Contingency Plan include a commitment of manpower and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful. A copy of the Oil Spill Contingency Plan for this facility may be found in Appendix P.

Signature Requirements
The SPCC Plan requires the approval of a manager with the authority necessary to implement the SPCC Plan. To comply with the requirements of 40 CFR 112, the appropriate manager will sign and date the Management Approval signature block in Section 1.1

The appropriate manager will also sign and date the 'Certification of the Applicability of the Substantial Harm Criteria Checklist' signature block in Appendix B.

General Comments
This SPCC Plan was developed in general accordance with the EPA's SPCC Regulation (40 CFR 112) and in accordance with generally accepted environmental engineering practices in the vicinity of the project at the time it was prepared. The limitations of this SPCC Plan should be recognized as KSU formulates conclusions on spill control measures at the campus.

The development of this SPCC Plan relied primarily upon readily available information, verbal and written reports of others, and visual observations from Terracon's site reconnaissance visit completed on March 31, 2023. The SPCC Plan is based on conditions and equipment observed at the Marietta campus at the time of the site visit, communications with campus staff, and information provided in the campuses previous SPCC plan dated May 2017. Terracon is not responsible for changes to systems and operations occurring after the site visit that may affect the SPCC Plan. It should be noted, existing transformers and hydraulic elevator reservoirs that were discussed in KSU Marietta's 2017 SPCC Plan were not observed during the site visit. Information on these units was obtained from the 2017 SPCC Plan. Terracon is also not responsible for the implementation and upkeep of the SPCC Plan or for addressing potential concerns. Terracon's review of the facility's programs is not intended to evaluate the adequacy of the program as it pertains to other requirements (i.e., National Fire

Protection Association requirements, NPDES Stormwater requirements, and the EPA's Underground Storage Tank regulation). Terracon does not warrant the work of third parties supplying information, which may have been used during the preparation of this report.

Terracon accepts no responsibility or liability to any person or organization for any claim, for loss or damage (including attorney's fees) caused, or believed to be caused, directly or indirectly by: conditions revealed or not revealed by the SPCC Plan; fines levied by regulatory agencies; and releases or spills of oils. No warranties, express or implied, are intended or made.

If you have comments or questions, please contact Terracon at (770) 924-9799.

Sincerely,

Ms. Ashley M. Ward
Environmental Staff Scientist

Mr. Christopher J. Hurst
Senior Environmental Consultant / Regional Manager Environmental Services

KENNESAW STATE UNIVERSITY

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1.0 SPCC PLAN ADMINISTRATION

1.1 Management Approval [40 CFR 112.7]

Kennesaw State University (KSU) is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining spill prevention, control, and countermeasures through the implementation and regular review/amendment of this SPCC Plan. This SPCC Plan has the full approval of KSU management. KSU has committed the necessary resources to implement the measures described in this SPCC Plan.

"I have personally reviewed the contents of this SPCC Plan and, to the best of my knowledge, find it to be accurate and representative of actual conditions of operation. I further attest that the plan has my approval and that in my current management capacity I have the commensurate authority to commit the necessary resources and manpower to implement and comply with the provisions of this SPCC Plan."

Management Authority: _____

Signature: _____

Title: _____

Date: _____

1.2 Designated Person [40 CFR 112.7(f)(2)]

The Designated Person and/or Responsible Individuals accountable for oil spill prevention at the facility with the authority to commit the necessary resources to implement this SPCC Plan are listed in the Emergency Contact table included in Appendix N and the Spill Response Team Table included in Appendix O.

1.3 Professional Engineer Certification [40 CFR 112.3(d)]

The undersigned licensed Professional Engineer (P.E.) is familiar with the requirements of 40 CFR 112 and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned P.E. attests that this SPCC Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR 112; that procedures for required inspections and testing have been established; and that this SPCC Plan is adequate for the facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112. This SPCC Plan is valid only to the extent that the facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this SPCC Plan.

Engineer: Christopher J. Hurst

Registration Number: PE034637

State: Georgia

Date: June 8, 2023

P.E. certification is required for the original SPCC Plan and SPCC Plan reviews and amendments that include a physical change that materially affects the oil spill potential. Non-physical changes (e.g., personnel names, titles, and phone numbers) do not require P.E. certification.

1.4 Location of SPCC Plan [40 CFR 112.3(e)]

The Kennesaw State University – Marietta Campus (hereafter, KSU - Marietta), Facilities Administration Building is attended at least eight hours a day; therefore, as required by 40 CFR 112.3(e), a copy of the SPCC Plan is maintained at the Facility and is available to the U.S. Environmental Protection Agency Regional Administrator (USEPA RA) or delegated USEPA representative for onsite review.

A copy of the certified SPCC Plan is located at the front desk in the Facilities Administration Building. Additional copies of the SPCC Plan are available through the EHS, Environmental Programs Manager or designated KSU employees.

1.5 SPCC Plan Review [40 CFR 112.5]

1.5.1 Changes in Facility Configuration [40 CFR 112.5(a)]

KSU will review and evaluate this SPCC Plan when there are changes in the KSU – Marietta Campus design, construction, operation, or maintenance that materially affect the campus' potential for an oil discharge, including, but not limited to:

- commissioning or decommissioning of containers;
- reconstruction, replacement, or movement of containers;

- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures;
- changes of product or service; or
- revisions to standard operation, modification of testing/inspection procedures, or use of new or modified industry standards or maintenance procedures.

Amendments to the SPCC Plan made to address changes of this nature are referred to as technical or major amendments, and must be certified by a P.E. Non-technical amendments can be performed by the facility owner and/or operator. Non-technical amendments include the following:

- change in the name or contact information of individuals responsible for the implementation of this SPCC Plan; or
- change in the name or contact information of spill response or cleanup contractors.

Technical and administrative amendments to the SPCC Plan will be documented on the SPCC Plan Review Log in Appendix I. KSU – Marietta will make the necessary revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The SPCC Plan must be implemented as soon as possible following a technical amendment, but no later than six months from the date of the amendment. The Designated Person is responsible for initiating and coordinating revisions to the SPCC Plan.

1.5.2 Scheduled SPCC Plan Reviews [40 CFR 112.5(b) and (c)]

KSU – Marietta will review this SPCC Plan at least once every five years. Revisions to the SPCC Plan, if needed, will be made within six months of the five-year review. A registered P.E. will certify technical amendments to the SPCC Plan in accordance with 40 CFR 112.3(d).

1.5.3 Record of SPCC Plan Reviews [40 CFR 112.5(b)]

Scheduled reviews and SPCC Plan amendments will be recorded in the SPCC Plan Review Log included in Appendix I. This log will be completed even if no amendment is made to the SPCC Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the SPCC Plan, the next scheduled review of this SPCC Plan must occur five years from the date of this SPCC Plan.

2.0 FACILITY INFORMATION

Name:	Kennesaw State University – Marietta Campus
Address:	1100 South Marietta Parkway Marietta, Cobb County, GA 30060
Latitude/Longitude:	33.93656 Latitude, -84.51516 Longitude
Type:	Onshore Nonproduction Facility
Owner/Operator:	Kennesaw State University
Primary Contact:	Terran Terrell, MPH – Environmental Programs Manager

2.1 Facility Description [40 CFR 112.7(a)(3)]

The KSU-Marietta campus is located at 1100 South Marietta Parkway, Marietta, Georgia 30060. KSU-Marietta is a public university with approximately 25,000 full time students located on approximately 230 acres of land in Marietta, Georgia. The facility is bounded by South Marietta Parkway SE to the north, Cobb Parkway SE to the east, South Cobb Drive on the west, Rottenwood Creek followed by Life University to the south. The properties surrounding KSU-Marietta are a mixture of commercial, educational, and residential properties. The surface of the facility consists of numerous buildings, concrete, asphalt, and maintained vegetation. Incident rain to the facility is conveyed through drainage channels to stormwater retention ponds and/or Rottenwood Creek. Bulk oil storage containers, oil-filled equipment, and transfer areas are further described in Section 2.2 and Appendices D and E.

Exhibit 1 shows the general location of the facility on a United States Geological Survey (USGS) topographic map. Exhibit 2 depicts a general layout of the facility, oil storage areas, piping, and the general direction of surface water flow. Exhibit 3 shows a campus map with each building identified by name. These Exhibits are included in Appendix A.

2.2 Oil Storage [40 CFR 112.7(a)(i)]

Oil storage containers with capacities of equal to or greater than 55 gallons are further described in Appendix D. Containers with a capacity of less than 55 gallons are not subject to the requirements of 40 CFR 112 and are not discussed in this plan.

It should be noted, transformers on site are owned, operated, and maintained by Marietta Power. As such, KSU Marietta is not responsible for the mitigation of oil spills associated with the transformers; however, KSU – Marietta staff will do what they can to contain a spill until Marietta Power can respond. The transformers on campus are addressed in this SPCC plan for reference purposes.

To qualify for exemption of an empty bulk storage container, the container not in use must be "permanently closed," as defined by the EPA, and/or removed from the facility. Permanent closure requires:

- Liquid and sludge to be removed from the container and connecting lines;
- Connecting lines and piping to be disconnected from the container and blanked off;
- Valves (except those for ventilation) are to be closed and locked; and
- Conspicuous signs are to be posted on the container stating that it is permanently closed with the closure date noted.

Once a bulk storage container is taken out of service in accordance with the above requirements, it will no longer be included in the facility's oil storage inventory and the requirements of 40 CFR 112 will no longer apply to that bulk storage container.

2.3 Wastewater Treatment [40 CFR 112.1(d)(6)]

The campus utilizes multiple subgrade grease traps sized at greater than 55-gallons which are associated with food preparation areas and dining halls on site. They include:

- Two 1,500-gallon grease traps (totaling 3,000 gallons) at the Stingers Dining Hall; and
- Two 1,500-gallon grease traps (totaling 3,000 gallons) at the Joe Mack Wilson Student Center (in the loading dock area).

Additional information on the units can be found in Appendix D.

The grease traps are cleaned by a professional service provider on a routine basis (at least quarterly). During these cleanings the units may be inspected to detect possible system upsets that could cause a discharge.

2.4 Distance to Navigable Waters and Adjoining Shorelines and Flow Paths

Based on review of the USGS topographic map of Marietta, Georgia (2020), the facility is located at an approximate elevation of 1000 to 1100 feet (NGVD). The campus is located at a high point and, in general, the western portion of the campus slopes to the west while the southern portion of the campus slopes to the south. Rottenwood Creek flows through the western portion of the campus from north to south before bending to the east after leaving the campus boundary and flowing adjacent to the southern portion of the campus.

There are three aboveground stormwater detention ponds on the western portion of the campus which receive stormwater from the Stingers and Hornet Village parking lots, as well as the University Columns residence area, before discharging to Rottenwood Creek. Additionally, there are two underground stormwater detention vaults located on the northern portion of the campus which collect stormwater from the Recreation and Wellness Center

Parking Lot and Lot P35, before entering the Cobb County Municipal stormwater system. The remainder of the site flows through channels and culverts that discharge directly to Rottenwood Creek. Stormwater flow for these areas is depicted on Exhibit 2 in Appendix A.

Releases associated with the ASTs at the Facilities Grounds and Vehicle Shop would likely flow to a nearby stormwater inlet located approximately 20 feet downgradient from the ASTs and discharge to a wooded portion of the campus to the southeast before entering Rottenwood Creek.

Releases from the bulk grease tanks at the Stingers building would likely flow to a drain located adjacent to the building near the storage closet and dumpster. It is believed this drain is directed to one of the detention ponds located in the area before discharging to Rottenwood Creek.

Releases associated with hydraulic reservoirs for elevator systems at the site are expected to be contained to the concrete-floored rooms containing the reservoirs. The rooms containing the elevator equipment do not contain floor drains.

Surface run-off is directed toward the storm drains. Releases that occur inside site buildings are expected to be contained within the buildings.

3.0 GENERAL REQUIREMENTS [40 CFR 112.7]

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees will receive training in the proper implementation of these measures.

3.1 Cross Reference with SPCC Provisions [40 CFR 112.7]

This SPCC Plan does not follow the exact order presented in 40 CFR 112. Section headings identify, where appropriate, the relevant section(s) of the SPCC regulation. Appendix C presents a cross-reference table of SPCC Plan sections relative to applicable parts of 40 CFR 112.

3.2 Compliance with Applicable Requirements [40 CFR 112.7(a)(1) and (2)]

In accordance with this SPCC Plan, the facility will be in compliance with applicable requirements of the regulation as further detailed in sections below.

3.3 Discharge Prevention Measures [40 CFR 112.7(a)(3)(ii)]

Transfer procedures and associated discharge prevention measures are further discussed in Section 4.14.

3.4 Potential Discharge Volumes and Direction of Flow [40 CFR 112.7(b)]

The table included in Appendix E presents expected volume, discharge rate, general direction of flow in the event of failure, and means of secondary containment for areas of the facility where oil is stored, used, or handled.

3.5 Containment and Diversionary Structures [40 CFR 112.7(c)]

Methods of secondary containment and/or active measures on campus to prevent oil from reaching navigable waters and adjoining shorelines include the following:

- **Double-Walled Steel:** Double-walled steel provides integrated containment for the two 650-gallon ASTs on site, as indicated in Appendix D. Releases from the inner shell would be detected via interstitial monitoring. Should a release occur from the outer shell, the leak would be detected during routine inspections of tanks and oil storage areas. Double-walled, shop-built ASTs satisfy the requirements of 40 CFR 112.7(c); therefore, calculations of additional secondary containment surrounding the double-walled, shop-built ASTs are not necessary.

- **Building Walls:** The hydraulic-oil-containing equipment associated with the hydraulic elevators on campus are located well within the interiors of each respective building, away from doors and drains leading outside. If a spill occurred from one of the hydraulic oil storage tanks, it would be contained within the building and is not believed to be able to reach a pathway to a navigable waterway.

- **Sorbent Material:** Spill cleanup kits that include absorbent material, booms, and other portable barriers are located near areas of oil storage for rapid deployment should a release occur. A large spill kit is located near the gasoline and diesel AST's at the Facilities Grounds and Vehicle Shop. For qualified oil-filled equipment (Section 3.10), the facility has provided active measures (e.g., sorbent material) of containment in the event of a discharge. For example, most elevator mechanical rooms are equipped with a small spill kit in addition to the building wall containment they have. Additionally, in the event of an outdoor release from a container or transformer KSU-Marietta will utilize absorbent pillows or pigs to block drains or drop inlets that are maintained in facility spill kits. A general response equipment inventory for the facility is listed in Appendix M of this SPCC Plan. Spill cleanup kits will be checked monthly to verify that used material is replenished.

- **Detention Ponds and Underground Stormwater Vaults:** There are three aboveground stormwater detention ponds on the western portion of the campus and two underground stormwater detention vaults on the northern portion of the campus. Portions of the stormwater drainage at the KSU-Marietta campus is

directed to each of these detention ponds/ vaults by channels, swales and/or sewers. Accumulated storm water in the detention ponds will be inspected for the presence of oils. In the event of an oil release onsite, response measures will be taken to contain and mitigate the oil spill prior to off-site discharge.

- **Diked Concrete Secondary Containment:** There is a concrete secondary containment basin located under the pole barn on the northern side of the Facilities Grounds and Vehicle Shop. At the time this plan was developed there were no qualifying mobile containers (i.e. 55-gallon drums or totes) storing oil on campus, therefore, the containment basin was not being utilized for spill containment measures. However, in the event a containment basin is needed, KSU-Marietta may utilize this unit. Secondary containment calculations including the 25-year Return Period, 24- hour precipitation event have been included in Appendix K for reference.

3.6 Practicability of Secondary Containment [40 CFR 112.7(d)]

KSU-Marietta management has determined that secondary containment for the 650-gallon diesel and gasoline ASTs, as well as the hydraulic reservoirs associated with the elevators is practicable at this facility.

However, KSU-Marietta management has determined that secondary containment for the bulk cooking oil containers located at Stingers Dining Hall is not practical or technically feasible. Due to the location of the tanks within a storage closest at the loading dock area for the building, additional containment measures are not practical without impeding the use of the loading dock. However, due to the semi-solid consistency of the food grease in the tank it is believed a leak or release will remain within close proximity to the tank.

Oil-filled operational equipment that is not equipped with secondary containment, such as the bulk cooking oil containers and the transformers (owned and operated by Marietta Power) are discussed in the Oil Spill Contingency Plan located in Appendix Q.

3.7 Inspections, Tests, and Records (40 CFR 112.7(e))

The facility performs monthly inspections as follows in Section 3.7.1. The schedule and frequency of inspection of bulk oil storage tanks and associated piping and containment are further described in Appendix F. Record of integrity and pressure testing, as applicable, will be maintained in Appendix G.

3.7.1 Monthly Inspection

Monthly visual inspections consist of a complete walk-through of the KSU-Marietta campus to cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning;
- Observing the exterior of portable containers, as applicable, for signs of deterioration or leaks;
- Observing portable containers for proper caps and seals when not in use;
- Observing ground and concrete surface under and around tanks for evidence of leaks;
- Observing tank level gauge for legibility and proper function;
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation;
- Observing secondary containment for evidence of cracks, corrosion, or poorly functional drain valves;
- Checking the inventory of discharge response equipment and restocking as needed;
- Observing the secondary containment structures for the presence of water and draining the containment if oil is not present; and
- Observing stormwater detention basins for the presence of oil or an oily sheen.

Issues regarding portable containers, secondary containment structures, or spill response equipment will immediately be reported to the Designated Person. Visible oil leaks will be repaired as soon as possible to prevent a larger spill or discharge. Pooled oil or oil-contaminated water will be removed and properly disposed of upon discovery.

The checklist provided in Appendix I will be used for monthly inspections by facility personnel and is available on the KSU website to be completed electronically according to the directions. These items covered in the inspection procedures are performed in accordance with good engineering practices.

This monthly report (checklist) is prepared on-line, reviewed, and signed by the Designated Person before being saved in archive files. The original electronic forms are saved and backed up for three years and then printed out and stored in archive for three years.

3.7.2 Annual Inspection

The annual inspections cover the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning;
- Observing the exterior of portable containers for signs of deterioration or leaks;
- Observing tank foundations, footings, and pad for settling, cracks, or other damage;
- Observing the tank fill and discharge valves and pipes for signs of poor connection that could cause a discharge;
- Observing grounding line between tank and foundation/support is in good condition;

- Tank shell, heads, and roof free of distortions, buckling, denting, and bulging;
- Signs of tank coating/painted surface failure;
- Normal and emergency vents free of obstructions;
- If interstitial leak detection is present is it in good condition; and
- If cathodic protection is in place is it in good working condition and been tested.

Issues regarding containers, secondary containment structures, or spill response equipment will immediately be reported to the Designated Person. Visible oil leaks will be repaired as soon as possible to prevent a larger spill or discharge. Pooled oil or oil-contaminated water will be removed and properly disposed of upon discovery.

The checklist provided in Appendix I will be used for annual inspections by facility personnel and is available on the KSU website to be completed electronically. These items covered in the inspection procedures are performed in accordance with good engineering practices.

This annual report (checklist) is prepared on-line, reviewed, and signed by the Designated Person before being saved in archive files. The original electronic forms are saved and backed up for three years and then printed out and stored in archive for three years.

3.8 Personnel, Training, and Discharge Prevention Procedures [40 CFR 112.7(f)(1) and (3)]

KSU-Marietta provides new employee Environmental Health and Safety (EHS) training, including oil handling safety, for appropriate personnel. KSU-Marietta contractors and vendors are responsible for providing oil-handling training to their own personnel.

Facility personnel responsible for discharge prevention will receive training in the operation and maintenance of equipment to prevent a discharge; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the content of this SPCC Plan. The training will be aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan.

The training will also consist of spill prevention briefings for oil-handling personnel. Such briefings highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Additional spill prevention briefings will be conducted if significant changes in oil storage, transfer, delivery or personnel occur. Facility operators and other personnel will have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

The Designated Person identified in Section 1.2 of this SPCC Plan is responsible for arranging oil discharge prevention, control, and response preparedness activities at this campus. Attendance and records of training and spill prevention briefings will be kept on the forms

shown in Appendix L and maintained with this SPCC Plan and/ or online for a period of three years.

3.9 Security [40 CFR 112.7(g)]

KSU – Marietta implements various measures of security on campus including:

3.9.1 Fencing [40 CFR 112.7 (G)(1)]

Fencing is utilized as a security measure on campus; however, the fencing is limited to certain sections of the KSU-Marietta Campus near sloped areas and Rottenwood River areas.

Access to the KSU-Marietta parking lots, classroom buildings, dormitories, facilities docks, storage buildings and waste storage areas is controlled and restricted by the University Police Department that provides 24 hours, seven days per week coverage.

3.9.2 Valves and Controls [40 CFR 112.7 (G)(2)]

The ASTs at KSU - Marietta have visual gauges to determine the amount of liquid in the tanks and are equipped with overfill level alarms that will notify the operator of the condition. Electrical transformers are closed and secured. All elevator controls and hydraulic fluid areas are locked and only accessible by KSU-Marietta authorized maintenance personnel and outside authorized contractors.

The fuel tanks are secured and access is limited and controlled. The distribution of fuel is performed or overseen by only authorized and trained KSU-Marietta personnel.

3.9.3 Electric Starter Controls [40 CFR 112.7 (G)(3)]

There are no electric starter controls in use on campus. All the emergency generators at KSU-Marietta use natural gas and are on standby status for automatic operation in the event of a power failure.

3.9.4 Loading And Unloading Connections [40 CFR 112.7 (G)(4)]

The unloading (filling) connections for the storage tanks are securely capped when not in use.

3.9.5 Lighting [40 CFR 112.7 (G)(5)]

There is adequate lighting in the oil handling and storage areas, emergency electrical generator, elevator equipment areas and electrical transformer areas. The lighting is sufficient to allow detection of spills or releases both by operating and security personnel, also limits potential vandalism.

3.10 Tank Car and Tank Truck Loading/Unloading Rack [40 CFR 112.7(h)]

There are no loading/unloading racks at this facility; therefore, this section is not applicable.

3.11 Field-Constructed Aboveground Containers [40 CFR 112.7(i)]

The facility does not operate field-constructed bulk storage tanks; therefore, this section is not applicable.

3.12 Conformance with State and Local Applicable Requirements [40 CFR 112.7(j)]

The State of Georgia does not maintain more stringent SPCC regulations than the US EPA.

A spill or discharge of oil in an unknown amount or an amount that creates a significant sheen on top of state waters or creates an emulsion or sludge under state waters must be reported immediately. The party with control over or knowledge of the spill must immediately (within 15 minutes) report it to the Georgia Emergency Management Agency and the Georgia Environmental Protection Division (EPD) Emergency Operations Center. Spills should also be reported to the nearest Georgia Environmental Protection Division (GEPD) Field Office. GEPD field offices are open during normal business hours (8 a.m. to 4:30 p.m.), while the state emergency response line is manned 24 hours a day. The Designated Person will notify the following:

- Georgia Emergency Management Agency (404-635-7000);
- Georgia Environmental Protection Division (EPD) Emergency Operations Center (800-241-4113); and
- GEPD Mountain District Field Office (404-362-2671 or 404-362-2712).

Depending on the severity of the spill or accidental discharge, the GEPD may require the owner or operator to:

- Take immediate remedial measures;
- Determine the extent of pollution to waters of the state;
- Provide alternate water sources to water users impacted by the spill or accidental discharge; or
- Other actions necessary to protect human health and the environment.

A list of Emergency Contacts is included in Appendix N. A Standard Notification and Reporting Form (Appendix P) will be completed immediately upon detection of a reportable discharge and can be used to report a spill. Additional notification and reporting requirements are addressed in Section 5.4.

3.13 Qualified Oil-Filled Operational Equipment [40 CFR 112.7(k)]

Qualified oil-filled operational equipment located at the facility includes the following:

- Hydraulic oil reservoirs for elevators; and
- Coolant oil reservoirs for electrical transformers.

Additional information on the number and oil storage capacity of the equipment can be found in Appendix D.

The campus provides secondary containment for the hydraulic oil reservoirs for the elevators, as identified in Section 3.5; however, there is no secondary containment provided for the transformers on campus. The transformers are owned, operated, and maintained by Marietta Power. If a leak of transformer oil occurs, the impacted electrical service area will be turned off and the Designated Person or designated Alternate will be notified. The Designated Person or designated Alternate will notify Marietta Power of the incident.

Marietta Power's emergency response team will deploy personnel to the KSU-Marietta campus to respond to the spill. Designated Person or designated Alternate or trained and authorized employee will monitor but will not mitigate (clean-up) the spill pending the arrival of the Marietta Power response team.

The facility has not had a single discharge from oil-filled operational equipment exceeding 1,000 gallons nor has the facility had two discharges from oil-filled operational equipment each exceeding 42 U.S. gallons within a twelve-month period in the three years prior; therefore, alternative requirements may be implemented in lieu of secondary containment for the oil-filled operational equipment at the facility. These requirements are as follows:

- Implement and document facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and
- Preparation of a contingency plan for oil spills, with a commitment of manpower, equipment and materials required to expeditiously control and remove quantities of oil discharged that may be harmful.

The facility does not provide secondary containment for all oil-filled equipment; therefore, an Oil Spill Contingency Plan has been prepared and is included in Appendix Q.

4.0 REQUIREMENTS FOR ONSHORE FACILITIES (EXCLUDING PRODUCTION FACILITIES) [40 CFR 112.8]

4.1 General Requirements [40 CFR 112.8(a)]

In accordance with this SPCC Plan, the facility will meet the general requirements for the SPCC Plan per 40 CFR 112.7 (Section 3.0) and the specific discharge prevention and containment procedures listed in this section.

4.2 Facility Drainage [40 CFR 112.8(b)]

Based on the layout of the facility and the locations of oil storage and associated containment systems at the site, there are no diked oil storage areas. Fueling of vehicles at the facility does not take place within a containment area. Fuel is discharged from the ASTs located at the Facilities Grounds and Vehicle Shop directly into vehicles. Additionally, the loading and unloading of diesel fuel and gasoline into ASTs, and new and used cooking oils into bulk cooking oil tanks do not take place in a containment area. Gasoline and diesel are transferred from the truck directly into the ASTs. New cooking oil is transferred directly from the truck into the bulk cooking oil tank and used cooking oil is pumped from the bulk cooking oil tank and removed by a contracted waste hauler.

Campus drainage systems from undiked areas are designed to discharge to ponds, lagoons, catchment basins, or wooded areas on site designed to retain oil before water enters Rottenwood Creek.

Releases associated with the ASTs at the Facilities Grounds and Vehicle Shop would likely flow to a nearby stormwater inlet located approximately 20 feet downgradient from the ASTs and discharge to a wooded portion of the campus to the southeast before entering Rottenwood Creek.

Releases from the bulk cooking oil tanks at the Stinger Dining Hall would likely flow to a drain located adjacent to the building near the storage closet and dumpster. It is believed this drain is directed to one of the detention ponds located in the area before discharging to Rottenwood Creek.

Should the facility utilize diked storage areas in the future those areas will be restrained by valves of manual, open-and-closed design to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by manually operated pumps or ejectors after visual observation of accumulated precipitation to ensure no oil will be discharged. If the facility drains directly into a watercourse and not into an on-site wastewater treatment plant, the facility must inspect drainage for indications of contamination prior to discharge.

Discharges from oil-filled operational equipment located inside buildings on campus (i.e. the hydraulic reservoirs) will be contained within the building walls and are not believed to be able to drain to a navigable waterway.

4.3 Bulk Storage Containers [40 CFR 112.8(c)(1)]

Bulk oil storage containers are constructed of materials in accordance with industry specifications. The design and construction of the bulk storage containers are compatible with the characteristics of the oil product they contain, and with temperature and pressure conditions. Appendix D summarizes the construction, volume, and content of bulk storage containers at the facility.

4.4 Secondary Containment [40 CFR 112.8(c)(2)]

The SPCC regulation requires that secondary containment structures for bulk storage containers be adequately sized to contain the volume of the largest container (or multiple containers, if equalized) and precipitation, or available freeboard, for a predicted storm event using the EPA-recommended 25-year, 24-hour storm event for the locale, if exposed to precipitation (https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html). Containment capacity should also account for displacement of other containers located within the containment (as applicable).

The bulk storage containers on the KSU – Marietta Campus are either double-walled or located within a closet or building interior, therefore, would not be exposed to precipitation. Should future containment structures be utilized, they will be capable of containing oil until cleanup occurs. Drainage from undiked areas will be confined in a catchment basin, holding pond, other system designed to retain oil on-site and/or return it to the facility.

Although not currently utilized as such, there is a concrete containment basin located under a pole barn structure at the Facilities Grounds and Vehicle Shop. The dimensions of the concrete containment basin were measured during Terracon's site visit completed on March 31, 2023. Based on the measured dimensions of the containment basin, secondary containment calculations were completed and are included in Appendix K for future reference should the containment basin be needed for spill prevention. Secondary containment calculations are based on level ground assumption inside the containment area using the highest elevation grade of the basin.

4.5 Drainage of Diked Areas [40 CFR 112.8(c)(3)]

The diesel and gasoline ASTs on site are double walled. Due to the design of the ASTs, accumulation of precipitation within the containment structures is not expected. However, should drainage events of the secondary containment structures be required, they will be recorded on the form included in Appendix J of this SPCC Plan and be maintained with the SPCC Plan for at least three years.

The hydraulic oil reservoirs for elevator equipment at the facility are located well within the interiors of site buildings, away from doors and drains leading outside. If a spill occurred from one of the hydraulic oil storage tanks, it would be contained within the respective building and is not believed to be able to reach a pathway to a navigable waterway.

Although the concrete secondary containment basin at the Facilities Grounds and Vehicle Shop is located under a pole barn roof, small amounts of precipitation could accumulate within the basin, depending on the rainfall event. Should this containment basin be utilized as a spill prevention measure again or additional outdoor diked areas be added to the campus, accumulated precipitation will be drained under direct supervision of facility personnel. The accumulated precipitation will be observed for signs of oil (e.g., sheen on the surface) prior to draining. The containment areas will be kept secure to prevent a direct discharge in the event of a precipitation event. Should oil be observed among the accumulated precipitation, the containment structure will be pumped into a separate container via a pump such that the affected precipitation can be properly treated and/or disposed of off-site. Drainage events will be recorded on the form included in Appendix J of this SPCC Plan and maintained with the SPCC Plan for at least three years.

4.6 Completely Buried Metallic Storage Tanks [40 CFR 112.8(c)(4)]

The facility does not maintain partially completely buried storage tanks; therefore, this section is not applicable.

4.7 Partially Buried or Bunkered Storage Tanks [40 CFR 112.8(c)(5)]

The facility does not maintain partially buried or bunkered storage tanks; therefore, this section is not applicable.

4.8 Inspections and Tests [40 CFR 112.8(c)(6)]

In addition to monthly and annual inspections and following material repairs, facility bulk oil storage containers will be tested or inspected following the Steel Tank Institute (STI) *Standard for the Inspection of Aboveground Storage Tanks*, SP-001, 2018 version. Records of inspections and/or tests will be maintained under usual and customary business practices for a period of three years. Records may be kept with this SPCC Plan, maintained electronically (i.e. through an electronic inspection platform, digital uploads), etc. Shell test comparison records will be retained for the life of the tanks, if applicable.

The following table summarizes inspections and tests to be performed on bulk storage containers. The information depicted in this table is derived from STI Standard SP-001 Table 5.5. The frequency of inspections for the bulk ASTs located at the facility follows the guidelines for a Category 1, shop-fabricated AST with a capacity of between 0 - 1100 gallons. To be considered a Category 1 tank, the AST must have spill control measures and a Continuous Release Detention Method (CRDM).

Inspection/Test	ASTs[1] (0-1100 gallons)
Visual inspection by site personnel (as per checklist of Appendix I)	M A†
External inspection by certified inspector (as per STI Standard SP-001)	OPT*
Internal inspection by certified inspector (as per STI Standard SP-001)	OPT*
Tank tightness test meeting requirements of 40 CFR 280	OPT*

Legend:

[1] Shop-fabricated ASTs with a storage capacity ranging from 0-1100 gallons. This includes the 650-gallon diesel and gasoline ASTs at the Facilities Grounds and Vehicle Shop.
M: Monthly
A: Annual
OPT: Optional per the Steel Tank Institute (STI)
* Or earlier, as recommended by the certified inspector based on findings from an external inspection if performed
† Internal inspection may be recommended by the certified inspector based on findings from the external inspection.

Oil-filled operational equipment is not considered a bulk storage container and is not subject to the integrity testing requirements of the SPCC rule; however, it is a good engineering practice to conduct monthly visual inspections as an effective means of verifying container integrity and to detect discharges as part of the facility's countermeasures for discharge discovery.

Records of inspections and tests will be maintained for at least three years and shell test comparison records will be retained for the life of the tanks, if applicable. Copies of results will be kept under usual and customary business practices and may be kept with this SPCC Plan, maintained electronically (i.e. through an electronic inspection platform, digital uploads), etc.

4.9 Heating Coils [40 CFR 112.8(c)(7)]

The facility does not maintain bulk storage containers with internal heating coils; therefore, this section is not applicable.

4.10 Overfill Prevention [40 CFR 112.8(c)(8)]

Each bulk storage container must be engineered or updated in accordance with good engineering practice to avoid discharges. Each oil storage container must provide at least one of the following devices:

- High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities, an audible air vent may suffice;
- High liquid level pump cutoff devices set to stop flow at a predetermined container content level;
- Direct audible or code signal communication between the container gauger and the pumping station;
- A fast response system for determining the liquid level of each bulk storage container such as digital computers, "telepulse", or direct vision gauges. If this alternative is utilized, the facility must be present to monitor gauges and the overall filling of bulk storage containers; and
- Regularly test liquid level sensing devices to ensure proper operation.

The gasoline and diesel ASTs on site are equipped with direct-reading level gauges, liquid level pump cutoff devices, and overflow alarms. Facility personnel and/or the tank truck driver will be present throughout the filling operations to monitor the product level in the tanks. Tank volumes will be observed prior to and during filling to prevent overfills.

The bulk cooking oil tanks utilized at the dining halls on campus are designed to capture potential overflow from one tank within the second tank. The tanks are connected to Wi-Fi for direct level readings and are equipped with liquid level sensing devices that are regularly testing by the hauling company.

4.11 Effluent Treatment Facilities [40 CFR 112.8(c)(9)]

There is an inactive, aboveground oil/water separator located between the Facilities Grounds and Vehicle Shop and Facilities Cart and Archive File Storage buildings. The unit is no longer being utilized as an oil/ water separator and KSU – Marietta has no plans of reinstating it. Should oil be observed among the accumulated precipitation within the oil/ water separator, the oily water in the unit will be pumped into a separate container for treatment and/or disposal of off-site.

4.12 Visible Discharges [40 CFR 112.8(c)(10)]

Visible discharges from a container or appurtenance – including seams, gaskets, piping, pumps, valves, rivets, and bolts – will be promptly corrected upon discovery.

A minor discharge will be cleaned up by facility personnel, whereas a major discharge would be controlled and cleaned up by a contractor. In the event of a minor or major discharge, accumulated free liquid is recovered whenever possible and properly disposed. Impacted soils from a minor release will be handled as waste, as described in Section 5.3 of this SPCC Plan.

4.13 Mobile and Portable Containers [40 CFR 112.8(c)(11)]

At the time of this SPCC Plan, the campus does not utilize mobile or portable containers of 55-gallons or greater for oil storage. Should mobile and portable containers be utilized at a later date, they will be positioned or located in designated areas, away from traffic and provided adequate secondary containment. This SPCC Plan will be updated accordingly to reflect any changes in oil storage quantities, containment, drainage, etc. on site.

4.14 Transfer Operations, Pumping, and In-Plant Processes [40 CFR 112.8(d)]

Oil transfer operations at the facility include the following:

- Transferring diesel or gasoline into the respective ASTs;
- Transfer of diesel or gasoline during fueling operations;
- Transferring new and used cooking oil between the bulk cooking oil tanks and the kitchen fryers;
- Loading and unloading cooking oil into and out of the bulk cooking oil tanks from the waste hauler truck; and
- Transfer of oils to applicable oil-filled equipment (i.e. hydraulic units).

To minimize the potential for release during transfer, the campus will verify that the transport driver(s) and/or operators understand the facility layout, know the protocol for entering the campus and loading product, and have the necessary equipment to respond to a discharge from the vehicle or oil delivery hose. Truck hoses and valves will be examined prior to transfer operations to assess their condition. Transfer operations for trucks are performed according to the procedures outlined in Appendix H. As a line of defense to capture a major release during transfer, sorbent booms may be placed down gradient of the transfer area, arranged in a semicircle, with additional sorbent materials located nearby during transfer activities. Inlet covers may also be utilized on stormwater inlets downgradient from transfer activities (i.e. at the Facilities Grounds and Vehicle Shop). Tanker truck and/or facility personnel observing transfer operations will be trained in how to shut off the flow at the tank if an unexpected release occurs during transfer operations.

It should be noted that the hydraulic units at the site are located inside buildings and would not be exposed to stormwater.

The facility does not maintain buried piping, however, aboveground piping is utilized to transfer cooking oil between the bulk cooking oil tanks and the kitchen fryers. Terminal connections are capped or blank-flanged (e.g., sealed) at the transfer point and marked to its origin when piping is not in service or is in standby service for an extended time. Pipe supports are properly designed to minimize abrasion and corrosion and also allow for expansion and contraction.

Aboveground piping, hoses, and valves will be examined routinely to assess their condition. Inspection includes aboveground valves, piping, appurtenances, expansion joints, valve glands and bodies, pipeline supports, locking of valves, and metal surfaces. Observations will be noted on the facility inspection checklist provided in Appendix I.

Aboveground piping for the cooking oil tanks is mounted to the side of the Stingers Dining Hall, above the line of traffic, therefore, is not accessible to vehicular traffic. The piping is single walled. Due to its location on campus, secondary containment is not practicable; therefore, is discussed in the Oil Spill Contingency Plan prepared for the campus and included in Appendix Q.

5.0 DISCHARGE DISCOVERY, RESPONSE, AND CLEANUP

The uncontrolled discharge of oil to land or water is prohibited by federal and state laws. Spills are typically discovered by on-site personnel during normal business hours. Immediate action must be taken to control, contain, and recover discharged oil. In general, the following steps will be taken in the event of a discharge or spill:

1.) KSU – Marietta personnel discovers or is notified of a spill or an alarm condition. The person discovering the spill must immediately:
   a. Eliminate potential spark sources;
   b. If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
   c. Contain the discharge with active spill response measures;
   d. Contact the Designated Person or Responsible Individual(s);

   The person discovering the spill must provide the following information or answers to the Designated Person or Responsible Individual(s):

- Nature of the spill and emergency;
- Location of spill or release (building number, specific area; waste shed, etc.)
- Size and extent of the spill or release;
- Hazardous materials spilled or released (if any);
- Provide information on any injured personnel (if any); and

- Any additional information regarding the emergency (fire, oil or chemical spill or release).

2.) The Designated Person or designated Alternate will assess the situation and determine who to notify and what action to take using standard response procedures that are the control, contain, cleanup and restore contingency plan process.

3.) The Designated Person will determine whether the spill may be cleaned up without assistance from outside resources. The Spill Response Team members will dike, contain and absorb any spilled oil products and clean up waste residues into a clean drum.

4.) The Designated Person will evacuate the release area, if required.

5.) The Designated Person will manage spill response actions at the scene, as appropriate, if not already done. These actions include: stopping the source of the release, mitigate the spill release area, cleaning up the spill and ensuring appropriate immediate repairs are initiated.

The Designated Person will request the assistance of clean up contractors, if necessary. The capabilities of the Emergency Response Contractor are included as Appendix B (SWS Environmental Services, 877-742-4215).

6.) The Designated Person will determine whether the spill is reportable to the Georgia Environmental Protection Division (GAEPD) and/or the USEPA based upon information in the following "External Agency Spill Notification" requirements paragraphs.

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released, as described in Sections 5.1 and 5.2.

A list of Emergency Contacts and a breakdown of the Spill Response Team responsibilities is provided in Appendix N and O, respectively. The lists are also posted at prominent locations throughout the KSU – Marietta campus. A general list of discharge response materials is maintained in Appendix M. Specific discharge response material inventories are maintained on or near each spill response kit.

5.1 Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (i.e., less than 10 gallons of oil);

- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material does not reach the water;
- There is little risk to human health or safety; and
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by trained facility personnel. The following general guidelines apply:

- Immediately notify the Designated Person;
- Under the direction of the Designated Person, contain the discharge with active spill response measures;
- Collect used spill response materials in properly labeled waste containers;
- Complete the Standard Notification and Reporting Form (Appendix P) and attach a copy to this SPCC Plan; and
- Notify and/or report to appropriate local, state, and/or federal agencies, as appropriate, in accordance with requirements discussed in Sections 3.12 and 5.4.

If the Designated Person is unavailable, a Responsible Individual should be contacted (Appendix N).

5.2 Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharge is to water or appears likely to enter water, including ditches or intermittent streams;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following general guidelines apply:

- Persons must immediately evacuate the discharge area;
- Immediately notify the Designated Person;
- Call for medical assistance if person(s) are injured;
- Notify local emergency agencies (e.g., fire department) and contracted emergency responders (Appendix N);

- Notify and/or report to appropriate local, state, and/or federal agencies, as appropriate, in accordance with requirements discussed in Sections 3.12 and 5.4;
- Record details and response measures on the Standard Notification and Reporting Form in Appendix P and attach a copy to this SPCC Plan; and
- Report to local, state, and/or federal agencies, as appropriate, in accordance with requirements discussed in Section 5.4.2.

If the Designated Person is unavailable, a Responsible Individual should be contacted (Section 1.2).

5.3 Waste Disposal [40 CFR 112.7(a)(3)(v)]

Wastes resulting from a minor or major discharge response will be containerized in impervious bags, drums, buckets, or other suitable containers as necessary. The Designated Person will be responsible for the characterization of the waste for proper disposal and verify that it is removed from campus by a licensed waste hauler.

5.4 Discharge Notification and Reporting

Upon notification of a spill, the Designated Person will determine if the oil spill requires notification and/or reporting to regulatory agencies as follows:

5.4.1 Notification Requirements [40 CFR 112.7(a)(4)]

A discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (NRC). The NRC is staffed 24-hours a day. State and/or local notification requirements are included in Section 3.12.

The person notifying the agency/agencies of the discharge must provide the following information:

- Name, location, organization, and telephone number of the person making the notification;
- Name, location, and telephone number of the facility;
- If different from the person making the notification, the name, address, and telephone number of the party responsible for the incident and contact person at the location of the discharge or spill;
- Date, time, and location of the discharge or spill;
- Specific description or identification of the oil, petroleum product, or other substances discharged or spilled;
- Estimated quantity of materials discharged or spilled;

- Duration of the incident;
- Source and cause of the discharge or spill;
- Description of media affected or threatened by the discharge (i.e., water, land, air);
- Damages or injuries caused by the discharge;
- Description of actions that have been taken, are being taken, and will be taken to stop, remove, and mitigate the effects of the discharge or spill;
- Whether an evacuation is needed;
- Identify governmental representatives, including local authorities or third parties, who have been contacted and/or are responding to the discharge or spill; and
- Other information that may help emergency personnel respond to the incident.

Contact information for the appropriate authorities is included in Appendix N and is also posted in prominent locations throughout campus.

A Standard Notification and Reporting Form is included in Appendix P of this SPCC Plan. Only those portions pertaining to notification of applicable agencies (see above) are required to be completed.

5.4.2 Reporting Requirements [40 CFR 112.4(a)]

A discharge of oil must be reported to the EPA Regional Administrator and to the appropriate state agencies when 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 in a 12-month period.

The following information must be submitted to the EPA Regional Administrator and to the appropriate state agencies within 60 days of the discharge:

- Name of the facility;
- Name of the owner/operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Description of facility, including maps, flow diagrams, and topographical maps (as necessary);
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system or subsystem in which the failure occurred;
- Corrective action and countermeasures taken, including a description of equipment repairs and/or replacements;

- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the EPA Regional Administrator.

Contact information for the appropriate authorities is included in Appendix N and is also posted in prominent locations throughout campus.

State and/or local reporting requirements are included in Section 3.12. A Standard Notification and Reporting Form is included in Appendix P of this SPCC Plan. Only those portions pertaining to reporting to applicable agencies (see above) are required to be completed.

5.5 Cleanup Contractors and Equipment Suppliers

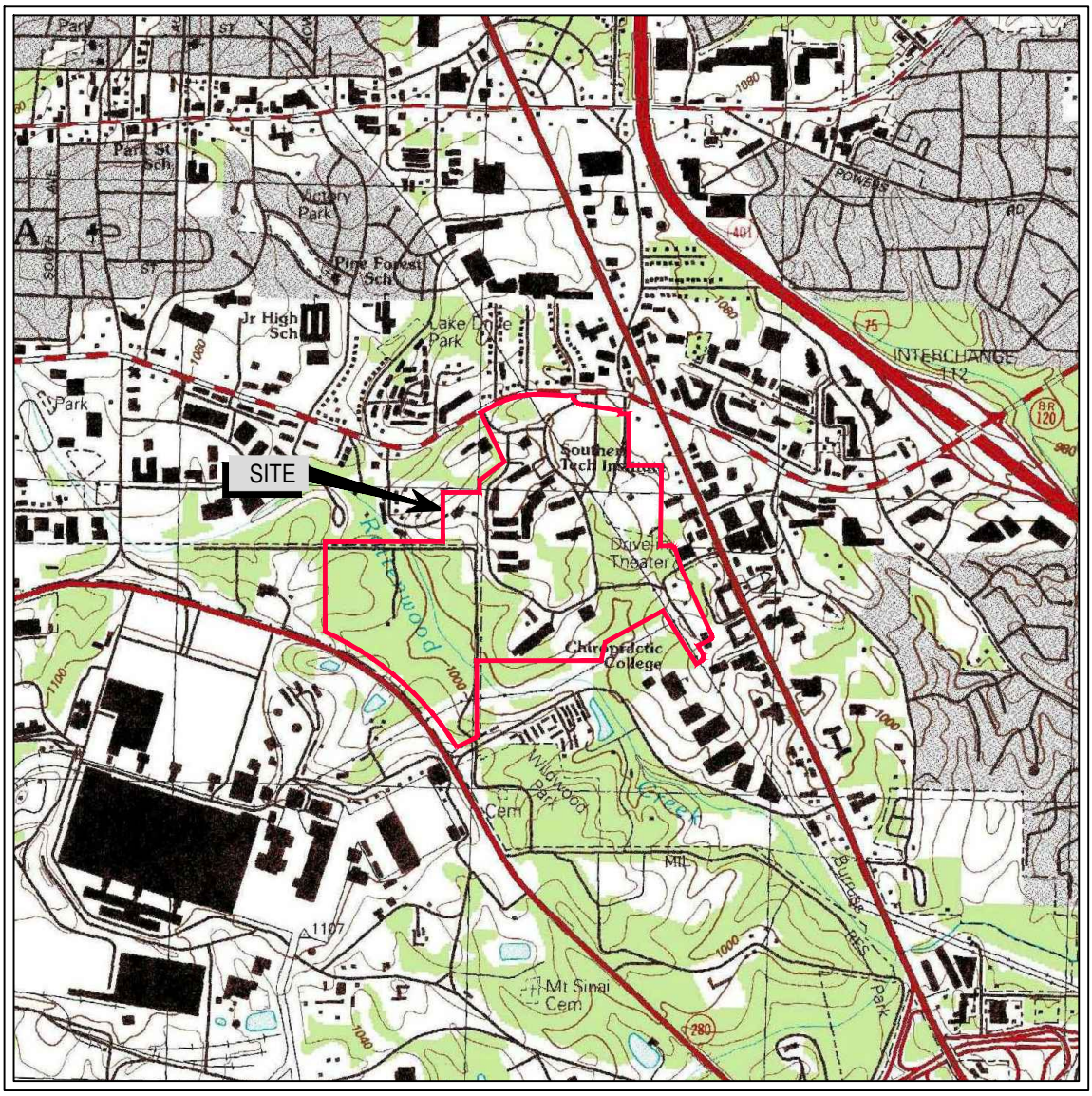
The campus utilizes a cleanup contractor with the necessary equipment to respond to a major discharge of oil and/or a discharge that affects the nearest navigable water or adjoining shorelines. Contractor information is available in Appendix N.

Spill kits are located near areas of oil storage. There is one stored near the two AST's at the Facilities Grounds and Vehicle Shop and smaller spill kits located within the mechanical rooms housing the hydraulic elevator oil tanks. A general, suggested inventory of response supplies and equipment is provided in Appendix M of this SPCC Plan. Spill kit inventories will be verified during facility inspections. Additional supplies and equipment may be ordered from contractors provided in Appendix N.

Appendix A

Exhibits

UNITED STATES – DEPARTMENT OF THE INTERIOR – GEOLOGICAL SURVEY



SCALE 1:24 000

1 .5 0 KILOMETERS 1 2

1000 0 METERS 1000 2000

1 .5 0 1

MILES

1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10 000

FEET

CONTOUR INTERVAL 20 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

N

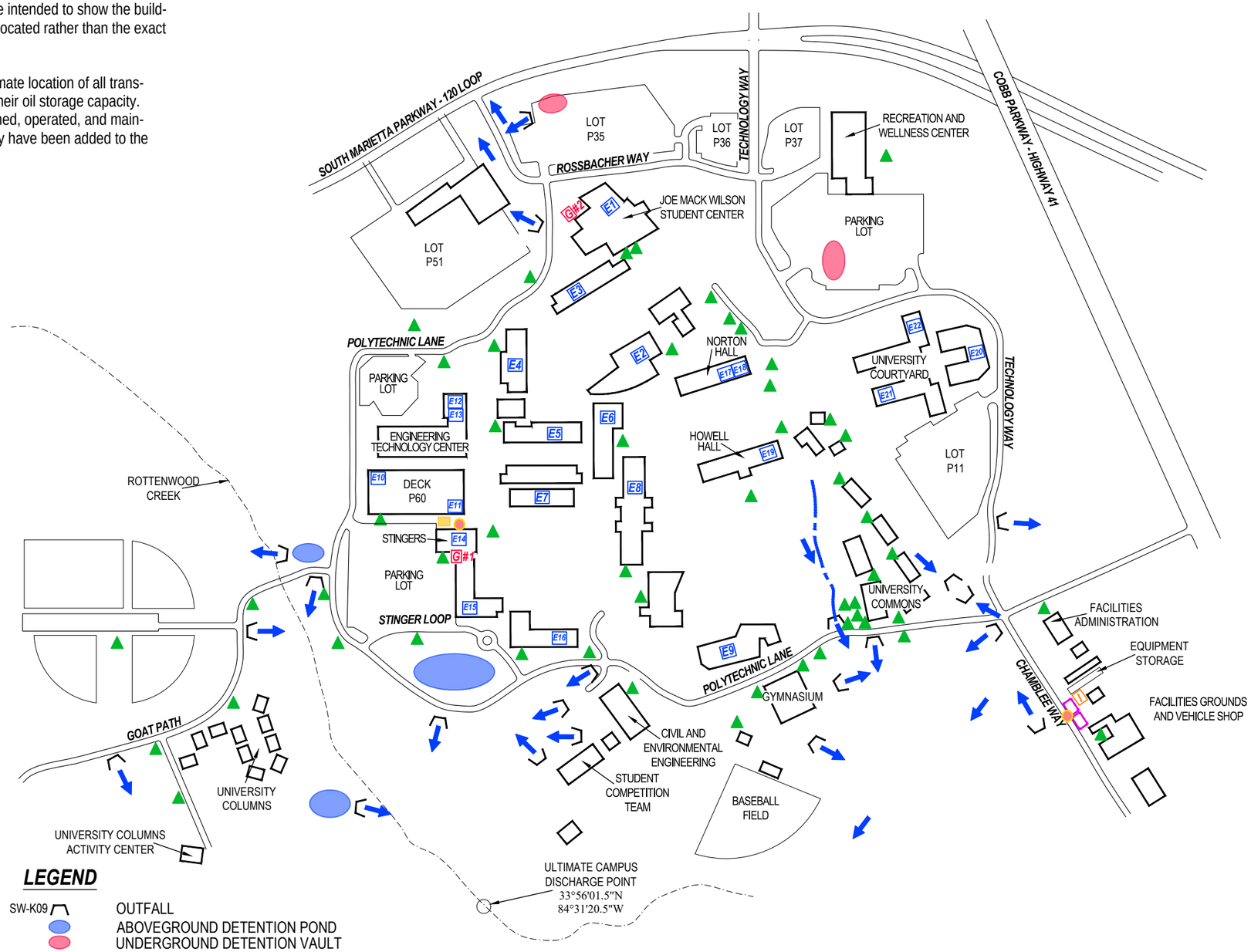
QUADRANGLE
KENNESAW, GA
1992
7.5 MINUTE SERIES (TOPOGRAPHIC)

*INDICATES WHICH MAP SITE IS LOCATED ON

Project Mngr: AMW	Project No. 49237099	Terracon Consulting Engineers and Scientists	TOPOGRAPHIC VICINITY MAP	EXHIBIT
Drawn By: RLW	Scale: AS SHOWN		SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN KSU - MARIETTA 1100 SOUTH MARIETTA PARKWAY MARIETTA, GA	4
Checked By: AMW/MRF	File No. 49237099-1			
Approved By: AMW	Date: APRIL 2023	2105 Newpoint Place, Ste. 600 Lawrenceville, GA 30043 (770) 623-0755 (770) 623-9628		

Notes:
- The depicted locations of the hydraulic elevator reservoirs are approximate. the labels are intended to show the building in which the reservoirs are located rather than the exact location within the building.

- This map depicts the approximate location of all transformers on site, regardless of their oil storage capacity. However, transformers are owned, operated, and maintained by Marietta Power. They have been added to the map for reference only.



N

0 460

Approximate Scale (Feet)

LEGEND

- SW-K09 — OUTFALL
- ABOVEGROUND DETENTION POND
- UNDERGROUND DETENTION VAULT
- STORMWATER DRAINAGE
- ABOVEGROUND STORAGE TANK
- FLOW
- TRANSFORMERS
- I — STORMWATER INLET
- G — GREASE INTERCEPTOR
- E# — HYDRAULIC ELEVATOR
- COOKING OIL #1
- SPIL KIT

THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Mngr:	AMW
Drawn By:	RLW
Checked By:	AMW/MRF
Approved By:	AMW
Project No.	49237099
Scale:	AS SHOWN
File No.	49237099-2
Date:	APRIL 2023

Terracon
Consulting Engineers and Scientists
2105 Newpoint Place, Ste. 600 Lawrenceville, GA 30043
(770) 623-0755 (770) 623-9628

SITE DIAGRAM

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
KSU - MARIETTA
1100 SOUTH MARIETTA PARKWAY
MARIETTA, GA

EXHIBIT 2

THIS DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Mngr:	AMW
Drawn By:	RLW
Checked By:	AMW/MRF
Approved By:	AMW

Project No.	49237099
Scale:	AS SHOWN
File No.	49237099-3
Date:	APRIL 2023

Terracon
Consulting Engineers and Scientists
2105 Newpoint Place, Ste. 600 Lawrenceville, GA 30043
(770) 623-0755 (770) 623-9628

BUILDING LOCATION DIAGRAM

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN
KSU - MARIETTA
1100 SOUTH MARIETTA PARKWAY
MARIETTA, GA

EXHIBIT 3

Appendix B

Criteria of Substantial Harm Determination

Facility Name: Kennesaw State University – Marietta Campus
Facility Address: 1100 S. Marietta Pkwy, Marietta, Cobb County, Georgia 30060

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 in 40 CFR part 112 Appendix C, Attachment C-III or a comparable 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 in 40 CFR part 112 Appendix C, Attachment C-III or a comparable 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.

Name: _____ Title: _____

Signature: _____

KENNESAW STATE UNIVERSITY

APPENDIX C

SPCC Plan Cross Reference Table

Provision	SPCC Plan Section	Location
112.3(d)	Professional Engineer Certification	Section 1.3
112.3(d)(6)	Wastewater Treatment	Section 2.3
112.3(e)(1), (2)	Location of SPCC Plan	Section 1.4
112.4(a)	Reporting Requirements Standard Notification and Reporting Form	Sections 3.15, 5.4.2 Appendix O
112.5	SPCC Plan Review	Section 1.5
112.5(a)	Changes in Facility Configuration	Section 1.5.1
112.5(b), (c)	Scheduled SPCC Plan Reviews SPCC Plan Review Log	Section 1.5.2 Appendix I
112.7	Management Approval	Section 1.1
112.7	Cross-Reference with SPCC Provisions SPCC Plan Cross-Reference Table	Section 3.1 Appendix C
112.7(a)(1), (2)	Compliance with Applicable Requirements	Section 3.2
112.7(a)(3)	Facility Description Exhibits	Section 2.1 Appendix A
112.7(a)(3)(i)	Oil Storage Bulk Oil Storage Containers and Equipment	Section 2.2 Appendix D
112.7(a)(3)(ii)	Discharge Prevention Measures	Section 3.3
112(a)(3)(iii)	Containment and Diversionary Structures	Section 3.5
112.7(a)(3)(iv)	Discharge Response	Sections 5.1, 5.2
112.7(a)(3)(v)	Waste Disposal	Section 5.3
112.7(a)(3)(vi)	Emergency Contacts	Appendix N
112.7(a)(4)	Notification Requirements Standard Notification and Reporting Form	Section 3.12, 5.4.1 Appendix O
112.7(a)(5)	SPCC Plan Organization	Section 3.1
112.7(b)	Potential Discharge Volumes and Direction of Flow	Section 3.4, Appendix E
112.7(c)	Containment and Diversionary Structures	Section 3.5
112.7(d)	Practicability of Secondary Containment	Section 3.6
112.7(e)	Inspections, Tests, and Records Inspection and Testing Program Logs and Inspection Checklists	Section 3.7 Appendix F Appendix I
112.7(f)(1), (3)	Personnel, Training, and Discharge Prevention Procedures Record of Annual Discharge Prevention Briefings and Training	Section 3.8 Appendix L
112.7(f)(2)	Designated Person	Section 1.2
112.7(g)	Security	Section 3.9
112.7(h)	Tank Truck Loading/Unloading Rack Requirements	Section 3.10

Provision	SPCC Plan Section	Location
112.7(i)	Field-Constructed Aboveground Containers	Section 3.11
112.7(j)	Conformance with Applicable State and Local Requirements	Section 3.12
112.7(k)	Qualified Oil-Filled Operational Equipment	Section 3.13
112.8(a)	General Requirements	Section 4.1
112.8(b)(1)	Facility Drainage	Section 4.2
112.8(b)(2)	Valve Design	Section 4.2
112.8(b)(3)	Drainage from Undiked Areas	Section 4.2
112.8(b)(4)	Diversion Systems	Section 4.2
112.8(b)(5)	Drainage Treatment Units	Section 4.2
112.8(c)(1)	Bulk Storage Containers	Section 4.3
112.8(c)(2)	Secondary Containment	Section 4.4
112.8(c)(3)	Drainage of Diked Areas	Section 4.5
112.8(c)(4)	Completely Buried Metallic Storage Tanks	Section 4.6
121.8(c)(5)	Partially Buried or Bunkered Storage Tanks	Section 4.7
112.8(c)(6)	Inspections and Tests	Section 4.8
112.8(c)(7)	Heating Coils	Section 4.9
112.8(c)(8)	Overfill Prevention	Section 4.10
112.8(c)(9)	Effluent Treatment Facilities	Section 4.11
112.8(c)(10)	Visible Discharges	Section 4.12
112.8(c)(11)	Mobile and Portable Containers	Section 4.13
112.8(c)(d)	Transfer Operations, Pumping, and In-Plant Processes	Section 4.14
112.20(e)	Criteria of Substantial Harm Determination	Appendix B

* Only selected excerpts of relevant rule text are provided. For a complete list of SPCC requirements, refer to the full text of 40 CFR 112.

APPENDIX D

Bulk Oil Storage Containers and Equipment

Total Oil Storage on Campus (including transformers): 19,838 Gallons
The total oil storage breakdown includes:

Table D-1: Kennesaw State University – Marietta Campus
Summary of Bulk Oil Storage

Fig ID	Tank ID	Storage Capacity (gallons)	Content	Description	Location	Discharge Prevention & Containment
Bulk Oil Storage Containers						
AST #1	Diesel AST	650	Diesel	Double-walled AST	Facilities Grounds and Vehicle Shop	Double-walled
AST #2	Gasoline AST	650	Gasoline	Double-walled AST	Facilities Grounds and Vehicle Shop	Double-walled
Cooking Oil #1	Cooking Oil Tank #1	210	New Cooking Oil	Vertical, plastic AST	Stingers Dining Hall	Active Spill Response/ Oil Contingency Plan
Cooking Oil #1	Cooking Oil Tank #2	210	Used Cooking Oil	Vertical, plastic AST	Stingers Dining Hall	Active Spill Response/ Oil Contingency Plan
Mobile or Portable Oil Storage Containers						
N/A						

Fig ID	Tank ID	Storage Capacity (gallons)	Content	Description	Location	Discharge Prevention & Containment
Oil-Filled Equipment (except hydraulic elevators and transformers)						
GI 1	Grease Interceptor #1	3,000	Used Cooking Oil	Subsurface Grease Interceptor	Stingers Dining Hall	N/A
GI 2	Grease Interceptor #2	3,000	Used Cooking Oil	Subsurface Grease Interceptor	Joe Mack Wilson Student Center (Loading Dock)	N/A
Total Non-Elevator, Non-Transformer Oil Storage: 7,720 gallons						

Notes:

1. Emergency generators are located throughout the campus, however, they are natural gas powered and therefore, are not subject to the SPCC regulation.
2. The capacity of the cooking oil tanks were provided in pounds of oil stored. Each tank is designed to hold 1,600 Ibs of cooking oil. Pounds of oil was converted to gallons using the assumption that cooking oil weighs approximately 7.6 Ibs./ gallon.

Table D-2: Kennesaw State University – Marietta Campus
Elevator Mechanical Rooms
Hydraulic Oil Tanks

Fig ID	Elevator Lift Station Location	Height (inches)	Length (inches)	Depth (inches)	Maximum Capacity (gallons)	Operating Oil Depth (inches)	Typical Oil Volume (gallons)
E1	Joe Mack Wilson Student Center	36	20.5	44	140.6	19	60.7
E2	Lawrence V. Johnson Library	36	20.5	44	140.6	24	76.7
E3	Mathematics Building	32.5	20	33.5	94.3	22	61.9
E4	Crawford Lab	32.5	20.5	33.5	96.6	21	60.6
E5	Engineering Lab	36.5	24	26.5	100.5	Unknown	Unknown
E6	Academic Building	32.5	20.5	33.5	96.6	22	63.5
E7	Design 2 Building	36	20.5	44	140.6	34	108.6
E8	Atrium Building	44.5	21	44	178.0	20	80.9
E9	Architecture	56.5	29.5	52.5	378.8	36	259.8

Fig ID	Elevator Lift Station Location	Height (inches)	Length (inches)	Depth (inches)	Maximum Capacity (gallons)	Operating Oil Depth (inches)	Typical Oil Volume (gallons)
E10	Parking Deck 1	48	24	57	284.3	28	139.6
E11	Parking Deck 2	48	24	57	284.3	43.5	216.9
E12	Engineering Technology Center	56	30	52	378.2	34	247.3
E13	Engineering Technology Center	56	32.5	52.5	413.6	23	181.2
E14	Stingers Dining Hall	48	24	57	284.3	38	189.5
E15	Hornet Village 100	48	24	57	284.3	36	179.5
E16	Hornet Village 200	48	24	57	284.3	44.5	221.9
E17	Norton Hall	44.5	20.5	44	173.8	32	126.4
E18	Norton Hall	36	20.5	44	140.6	32	102.2
E19	Howell Hall	44.5	20.5	44	173.8	32	126.4
E20	Courtyard 1000	32.5	20.5	33.5	96.6	19	54.8

Fig ID	Elevator Lift Station Location	Height (inches)	Length (inches)	Depth (inches)	Maximum Capacity (gallons)	Operating Oil Depth (inches)	Typical Oil Volume (gallons)
E21	Courtyard 2000	32	20.5	33.5	95.1	22	62.5
E22	Courtyard 3000	32	20.5	34.5	98.0	19	54.0
Total Oil Storage – 22 Elevators:		**Maximum Capacity = 4,357.8 gallons**				**Typical Capacity = 2,675 gallons**	

Notes:

1. Elevator hydraulic oil tank volumes are based on data provided in previous SPCC plans. KSU Marietta had previously provided the elevator hydraulic oil tank volumes based on supplier's information and maintenance records.

2. The hydraulic reservoirs are located well within the interiors of each respective building, away from doors and drains leading outside. If a spill occurred from one of the hydraulic oil storage tanks, it would be contained within the building and is not believed to be able to reach a pathway to a navigable waterway.

3. Terracon did not observe all of the elevators identified in this SPCC. Observations were limited to oil storage areas added after the previous SPCC plan was prepared. As such, remaining information was collected from the client-provided 2017 SPCC for the facility.

Table D-3: Kennesaw State University – Marietta Campus Electrical Transformers [1, 2]

Transformer No. [3]	Location Description [4]	Storage Capacity (gallons)	Content
3271	Lawrence V. Johnson Library	210	Coolant Oil
5187	Norton Hall	222	Coolant Oil
3238	Administration Building/ Lot 4	430	Coolant Oil
2612	Mathematics Building	125	Coolant Oil
4048	Joe Mack Wilson Student Center	290	Coolant Oil
4358	Recreation and Wellness Center	215	Coolant Oil
5539	2000 Courtyard Apartments	305	Coolant Oil
5581	3000 Courtyard Apartments	305	Coolant Oil
5467	1000 Courtyard Apartments	305	Coolant Oil
6013	Howell Hall	140	Coolant Oil
4097	Soccer & Recreation Storage Building	210	Coolant Oil
5168	Facilities Maintenance Shop and Facilities Grounds and Vehicle Shop	220	Coolant Oil
5177	Facilities Administration and Facilities Cart and Archive File Storage	215	Coolant Oil

Transformer No. [3]	Location Description [4]	Storage Capacity (gallons)	Content
5092	Architecture Building	460	Coolant Oil
5169	Gymnasium (S2)	200	Coolant Oil
2617	Wilder Communications Building	120	Coolant Oil
5602	Student Competition Team	164	Coolant Oil
4548	Civil Engineering Tech	215	Coolant Oil
3542	W. Claire Harris Textile Center	232	Coolant Oil
4901	Atrium Building	265	Coolant Oil
6852	200 Commons Residences	263	Coolant Oil
6853	100 Commons Residences	263	Coolant Oil
6821	Stingers Dining Hall	162	Coolant Oil
6586	Parking Deck	149	Coolant Oil
6854	Engineering Technology Center	392	Coolant Oil
3277	Crawford Lab	430	Coolant Oil
6754	Design 1 Building	205	Coolant Oil
4897	Engineering Lab	220	Coolant Oil

Transformer No. [3]	Location Description [4]	Storage Capacity (gallons)	Content
6800	Eastern Side of Stingers Dining Hall	149	Coolant Oil
3311	K Field (Between Atrium Building and Stingers Dining Hall)	450	Coolant Oil
2512	Academic Building	230	Coolant Oil

Total Oil Storage - Transformers: 7,761 gallons

Notes:

1. Marietta Power owns and maintains all electrical transformers on campus. KSU contacted Mr. Jeremiah Fields, Electrical Engineer at Marietta Power, and requested a list of the transformers currently on site, along with their oil storage capacities and locations. Mr. Fields responded with a list of the transformer names, however, stated they do not have a record of the amount of oil in each transformer. No information was provided as to the location corresponding to each transformer name. However, based on the information provided, there are 56 transformers located on the KSU Marietta Campus. 31 are understood to contain 55-gallons or more of oil.

2. Transformer information was obtained from the 2017 SPCC Plan. There have reportedly been no new transformers added to the campus since the previous SPCC plan was developed.

3. Transformer No.'s were marked on each of the transformers on the list. Numbering was implemented by Marietta Power.

4. The location descriptions are based on the locations described in the 2017 SPCC Plan and the updated campus map on KSU's website.

APPENDIX E

Potential Discharge Volume and Direction of Flow

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Bulk Storage Area – Gasoline and Diesel AST's at Facilities Grounds and Vehicle Shop				
Failure of aboveground tank (collapse or puncture below product level)	650 (1)	Gradual to instantaneous	Into interstitial space of double-walled containment or into adjacent concrete secondary containment basin	Double-walled tank or Active Response/Sorbent Material(4)
Tank overfill	1-300 (2)	60 gal/min	Onto concrete surrounding tank before flowing to nearby stormwater inlet approx. 20 feet downgradient	Active Response/Sorbent Material(4)
Leaking hose or valve packing	5 (2)	1 gal/min		
Hose leak during transfer	5 (2)	1 gal/min		
Bulk Storage Area – Cooking Oil Grease Tanks				
Failure of aboveground tank (collapse or puncture below product level)	210 (1)	Gradual to instantaneous	Into storage closet housing tanks before flowing into loading dock area	Active Response/Sorbent Material(4)
Tank overfill	1-50 (2)	10 gal/min		
Leaking hose or valve packing	5 (2)	1 gal/min	Into storage closet housing tanks and/or into loading dock area	
Hose leak during transfer	5 (2)	1 gal/min		

Potential Event	Maximum volume released (gallons)	Maximum discharge rate	Direction of Flow	Secondary Containment
Oil-filled Equipment – Elevator Hydraulic Reservoirs				
Failure of vessel	Up to 284 (1)	Instantaneous	Varies – contained within buildings (elevator equipment)	Building Walls / Active Spill Response/ Sorbent Material(4)
Corrosion of vessel	Up to 210(2)	Up to 42 gallons/min(3)		
Leaking pipe or other associated equipment (7)	Up to 25(2)	Up to 5 gallons/min(3)		
Portable Container Area				
N/A				
Aboveground Piping(5)				
Rupture/failure due to corrosion	Up to 25(2)	Up to 5 gallons/min(3)	Onto ground between Stingers Dining Hall and Parking Deck	Active Response/Sorbent Material(4)
Rupture/failure due to impact	N/A – piping is located above vehicle traffic			
Leaks	Up to 25(2)	Up to 5 gallons/min(3)	Onto ground between Stingers Dining Hall and Parking Deck	Active Response/Sorbent Material(4)
Transfers and Loading Operations (Diesel AST)				
Rupture of transport truck loading hose	Up to 1,250(2)	~250 gal/min(3)	Varies	Active Response/Sorbent Material(4)
Leak of offload line, connection	Up to 1,250(2)	~250 gal/min(3)	Varies	
Over-topping during tank truck loading	Up to 1,250(2)	~250 gal/min(3)	Varies	
Rupture, leak of valve packing of transfer valve	Up to 1,250(2)	~250 gal/min(3)	Varies	

(1) Based upon release of largest bulk storage tank.
(2) Maximum volume released calculated based on 5 minutes of discharge at the maximum discharge rate.
(3) Dependent on extent of damage or detection of leaks/spills.
(4) It is assumed that containment/absorbent materials will be sufficient to contain discharges to the property.
(5) Equipment utilizing aboveground piping consists of the bulk cooking oil tanks. Elevator equipment, which is located inside facility buildings, also utilizes aboveground piping, however, a release to building exteriors is not believed to be possible.

APPENDIX F

Inspection and Testing Program

Facility Component	Section(s)	Action	Method, Circumstance, and Required Action
General Requirements Applicable to All Facilities			
Bulk storage containers with no secondary containment and for which an impracticability determination has been made.	**112.7(d)**	**Test**	Integrity testing will be required for bulk storage containers for which secondary containment is not practicable. *In accordance with a prescribed integrity standard in Appendix G.*
Valves and piping associated with bulk storage containers with no secondary containment and for which an impracticability determination has been made.	**112.7(d)**	**Test**	Integrity and leak testing of valves and piping associated with containers that have no secondary containment as described in 112.7(c). *In accordance with a prescribed integrity standard in Appendix G.*
Recordkeeping Requirement	**112.7(e)**	**Record**	Keep written procedures and a signed record of inspections and tests for a period of three years. Records kept under usual and customary business practices will suffice. *For each action.*
Onshore Facilities (Excluding Oil Production Facilities)			
Diked areas	**112.8(b)(1) and 112.8(b)(2)**	**Inspect Record**	Visually inspect content for presence of oil when draining into a watercourse. *Prior to draining.* Keep adequate records of such events.
Aboveground bulk storage container	**112.8(c)(4)**	**Test or Inspect**	Test or inspect each container for integrity. *Following a regularly schedule and whenever material repairs are made.*
Aboveground bulk storage container	**112.8(c)(6)**	**Inspect**	Inspect outside of container for signs of deterioration and discharges. *Monthly visual inspections.*
Aboveground bulk storage container supports and foundations	**112.8(c)(6)**	**Inspect**	Inspect container's supports and foundations. *Monthly and annual visual inspections.*
Liquid level sensing devices	**112.8(c)(8)**	**Test**	Test for proper operation. *Annual Inspections and performed According to manufacturer's specifications.*
Bulk storage containers	**112.8(c)(10)**	**Corrective Action**	Correct visible discharges which result in a loss of oil from the container, including seams, gaskets, piping, pumps, valves, rivets, and bolts. Remove accumulations of oil in diked areas. *Promptly.*
All aboveground valves, piping, and appurtances	**112.8(d)(4)**	**Inspect**	During the inspection, assess general condition of items such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. *Monthly and Annual visual inspections.*

APPENDIX G

Records of Inspection and Integrity Testing

A Periodic Inspection is a visual, documented inspection conducted by the tank owner or an owner's inspector to assess the general tank conditions, as best as possible, without suspending tank operations or removing the tank from service. Periodic Inspections will be conducted at the facility as part of the monthly facility inspection and documented using the inspection checklists provided in Appendix I.

A Formal External Inspection is a documented external inspection conducted by a certified or periodic preventative inspector to assess the condition of the tank and determine its suitability for continued service without entry into the tank interior. The external inspection may include ultrasonic testing of the shell, as specified in the standard, to assess the integrity of the tank for continued oil storage.

A Formal Internal Inspection is a documented internal inspection conducted by a certified or periodic preventative inspector to assess the internal and external condition of the tank and determine its suitability for continued service. This includes the inspection requirements of a Formal External Inspection. A Formal Internal Inspection satisfies the requirements of a Formal External Inspection and is considered equivalent to or better than a Formal External Inspection for the purposes of scheduling.

A certified integrity tank and vessel inspection will be performed in accordance with the (STI) Standard for the Inspection of Aboveground Storage Tanks, SP-001, FTPI RP 2007-1, or if evidence of material stress appears, tank or vessel leaks occur, there is a change in service, or a tank or vessel is relocated.

A leak test is a documented test of the tank to determine if the tank is leaking.

APPENDIX H

Oil Transfer Procedures

Stage	Tasks
Prior to transfer	☐ Visually check hoses for leaks and wet spots.
	☐ Verify that sufficient volume is available in the storage tank or truck.
	☐ Lock in the closed position drainage valves of the secondary containment structure.
	☐ Secure the tank vehicle with wheel chocks and/or interlocks.
	☐ Verify that the vehicle's parking brakes are set.
	☐ Verify proper alignment of valves and proper functioning of the pumping system.
	☐ If filling a tank truck, inspect the lowermost drain and outlets.
	☐ Establish adequate bonding/grounding prior to connecting to the oil transfer point.
	☐ Turn off cell phone.
During transfer	☐ Driver and/or facility personnel must stay with the vehicle during transfer activities.
	☐ Periodically inspect systems, hoses, and connections.
	☐ When loading, keep internal and external valves on the receiving tank open along with the pressure relief valves.
	☐ When making a connection, shut off the vehicle engine. When transferring oil, shut off the vehicle engine unless it is used to operate a pump.
	☐ Monitor the liquid level in the receiving tank to prevent overflow.
	☐ Monitor flow meters to determine rate of flow.
	☐ When topping off the tank, reduce flow rate to prevent overflow.
After transfer	☐ Make sure the transfer operation is completed.
	☐ Close tank and loading valves before disconnecting.
	☐ Securely close vehicle internal, external, and dome cover valves before disconnecting.
	☐ Secure hatches.
	☐ Disconnect grounding/bonding wires.
	☐ Make sure the hoses are drained to remove the remaining oil before moving them away from the connection. Use a drip pan.
	☐ Cap the end of the hose and other connecting devices before moving them to prevent uncontrolled leakage.
	☐ Remove wheel chocks and/or interlocks.
	☐ Inspect the lowermost drain and outlets on tank truck prior to departure. If necessary, tighten, adjust, or replace caps, valves, or other equipment to prevent oil leaking while in transit.

APPENDIX I

Logs and Inspection Checklists

SPCC Plan Review and Amendment Log

Scheduled reviews and SPCC Plan amendments will be recorded in the SPCC Plan Review Log below. This log will be completed even if no amendment is made to the SPCC Plan as a result of the review.

By	Date	Amendment Description	P.E. certification required?	P.E. Name	Licensing State: Registration No.
AMEC (formerly MACTEC)	August 2011	Initial Development	Yes	S. Scott Keesling, P.E.	
Bureau Veritas North America, Inc.	May 30, 2017	Major Revision – based on more recent and current information regarding campus and personnel	Yes	Kenneth L. Brooke, P.E.	26609
Terracon Consultants	June 8, 2023	5-Year Update	Yes	Chris Hurst	PE034637

KENNESAW STATE UNIVERSITY

FACILITY MONTHLY INSPECTION FORM

*This inspection record must be completed each month. Provide further description and comments, if necessary, on an attached piece of paper. *An item that receives "yes" as an answer must be described and addressed immediately.*

This Inspection Form is electronic and is contained in the KSU environmental management system. This system can be accessed 24 hours per day and seven days per week.

INSPECTOR: _____ DATE: _____ TIME: _____

The Inspection Form contents are for Aboveground Storage Tanks (ASTs) that contain oil:

Are the egress pathways at the tank clear?	Y/N/NA
There is no evidence of tank or container settlement or foundation deterioration?	Y/N/NA
There is no significant cracking or spilling of secondary containment?	Y/N/NA
Are tank or container supports in satisfactory condition?	Y/N/NA
Are external tank or container surface are not in contact with water?	Y/N/NA
Grounding straps are secured and in good condition?	Y/N/NA
Is the interstitial space of the double wall tank free of liquid?	Y/N/NA
Is the tank or container coating in good condition?	Y/N/NA
There are no noticeable tank shell/head distortions, buckling, denting or bulging?	Y/N/NA
Are the tank vents free of obstruction?	Y/N/NA
Tank liquid level sensing devices have been tested to ensure proper operation (annually)?	Y/N/NA
No evidence of spills or releases (pooling, staining, etc.)?	Y/N/NA
Unloading procedures are in place and have been communicated to the appropriate personnel and haulers?	Y/N/NA
Lighting is sufficient for nighttime spill release detection?	Y/N/NA

Required spill response equipment is present, in good condition and not expired? Y/N/NA

Loading/unloading areas free of spills or staining? Y/N/NA

The questions for Electrical Transformers are as follows:

Transformer structural supports and foundation are in satisfactory condition? Y/N/NA

Is the transformer paint in good condition? Y/N/NA

No visible signs of stress, leakage, corrosion, or other potentially significant degradation? Y/N/NA

No evidence of spills or releases (pooling, staining)? Y/N/NA

Necessary spill response equipment is present nearby? Y/N/NA

The F4 Area 55-gallon drums are in good condition? Y/N/NA

(This form is on the KSU-Marietta website)

Additional Remarks:

Date: _____ Signature: _____

KENNESAW STATE UNIVERSITY

FACILITY ANNUAL INSPECTION FORM

INSPECTOR: _____ DATE: _____ TIME: _____

Instructions: This check sheet is to be used during program review process of the SPCC.

	Drainage		ASTs
	Pipelines		**Oil-Filled Electrical Equipment**
	Drums and Containment Pallets		
	Security		**Training**

NOTES:

A “0” answer to any item will require corrective action. Initial and date the follow-up actions.

√=Satisfactory, N/A=Not Applicable; 0=Repair/Correction Necessary; C=See comment section

Remarks/Comments/Recommendations/ and Record of Corrective Actions

The inspections required by the SPCC Plan are conducted at the frequencies listed below.

Issues Inspected	Frequency	Responsible Party

APPENDIX J

Record of Containment Drainage

Date	Diked Area	Presence of Oil (Y/N)	Approximate Quantity Removed (Gallons)	Time	Signature / Comments

APPENDIX K

Calculation of Secondary Containment Capacity

The two 650-gallon ASTs containing diesel and gasoline fuel on site are double-walled, shop-built ASTs which satisfy the requirements of 40 CFR 112.7(c); therefore, calculations of additional secondary containment surrounding the double-walled ASTs are not necessary.

There is a concrete secondary containment basin located under the pole barn on the northern side of the Facilities Grounds and Vehicle Shop. At the time this plan was developed there were no qualifying mobile containers (i.e. 55-gallon drums or totes) storing oil on campus, therefore, the containment basin was not being utilized for spill containment measures. However, in the event a containment basin is needed, KSU-Marietta may utilize this measure. Secondary containment calculations for this system have been provided below for reference. Calculations are based on the understanding that the basin will be cleared of all debris and equipment prior to use. Additionally, based on its location under a roofed structure precipitation is not expected to accumulate within the basin.

Secondary Containment Structure at Facilities Grounds and Vehicle Shop

Containment Dimensions:
Containment Area = 13.75 ft x 13.58 ft = 186.73 ft^2
Containment Height = 0.67 ft
Total Containment Volume = 186.73 ft^2 x 0.67 ft = 125.11 ft^3 x 7.48 gal/ ft^3 = 935.79 gallons

Volume Displaced By Drums/ Containers:
TBD

Total Available Volume (before displacement) = 935.79 gallons

APPENDIX L

SPCC Training Session Records and Briefing Documentation

The undersigned have been given training in:

1) Inspection of equipment to prevent oil discharge
2) Applicable pollution control laws, rules, and regulations
3) Spill containment and cleanup procedures

Attendee	Signature	Date	Instructor

RECORD OF SPILL PREVENTION BRIEFINGS

Instructions: Briefings will be scheduled and conducted by facility management for responsible personnel at intervals frequent enough to assure adequate understanding of this SPCC Plan.

These briefings should also highlight and describe known spill events or failures, malfunctioning components and recently developed precautionary measures.

Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control laws, rules and regulations. During these briefings, there will be an opportunity for all personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility.

Date:_____

Attendees:

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Subject & Issue:

_____

_____

_____

Recommendations & Suggestions:

_____

_____

_____

_____

APPENDIX M

Discharge Response Equipment Inventory

Spill kit discharge response equipment inventories will be verified during facility inspections and will be replenished as needed. An individual inventory for each specific spill kit should be maintained on or near the spill kit itself. The following inventory is a general inventory to be used as guidance when stocking and/or replenishing spill kits.

- ☐ Empty 55-gallons drums to hold contaminated material
- ☐ Loose absorbent material
- ☐ Absorbent pads
- ☐ Nitrile gloves
- ☐ Neoprene gloves
- ☐ Vinyl/PVC pull-on overboots
- ☐ Non-sparking shovels
- ☐ Brooms

APPENDIX N

Emergency Contacts

Designated Person responsible for spill prevention: Terran Terrell
Environmental Programs Manager
(470) 578-5026

Emergency Contacts

Facility	
Team Leader – Terran Terrell, Environmental Programs Manager	M: 470-578-5026
Alternative – Gary Paoletta, Director MEP Operations	M: 770-658-8491
Local Emergency Response	
KSU Marietta Police	470-578-6206
Campus Emergency	470-578-6666
Campus Non-Emergency	470-578-6206
Marietta Fire Department Emergencies	911
Marietta Power (Electrical)	Emergency:770-794-5160 Non-Emergency: 770-794-5150
Local Water Supply – Cobb County Water System	770-419-6200
State Emergency Response	
Georgia Environmental Protection Division (EPD) – Mountain District Office	770-387-4900
Georgia Environmental Protection Division (EPD) – 24 Hour Spill Hotline	800-241-4113
State Emergency Response Commission (SERC) – Anita Mathis	(470) 225-3829
National Emergency Response	
National Response Center	800-424-8802
United States EPA, Region 4 24-Hour Spill Reporting	404-562-8700
United States EPA, Region 4 Office	404-562-9900
Emergency Response/Cleanup Contractor	
Full Circle Restoration	Emergency: 770-232-9797 Non-Emergency:877-238-5524
Environmental Consultant	
Terracon Consultants	770-924-9799

APPENDIX O

Spill Response Team

The members of the Spill Response Team are delegated specific tasks for the development, implementation, and revision of the SPCC.

The members consist of KSU-Marietta maintenance personnel and management. The following tasks have been assigned to SPCC team members.

1) Plan Implementation
2) Best Management Practice Selections
3) Spill Response
4) Inspection and Annual Evaluations
5) Employee Training
6) Record Keeping and Plan Revision
7) Signature Authority

The following individuals, who have been identified by KSU-Marietta, make up the SPCC Team. Assigned tasks are indicated by number:

Team Member	Name/ Title	Assigned Tasks
Designated Person	Terran Terrell, Environmental Programs Manager	1 through 7
First Alternate	Gary Paoletta, Director MEP Operations	1 through 6
Team Member	KSU – Marietta Police	1 through 5
Trained Emergency Response Personnel	Full Circle Restoration	1 and 3

Concerted efforts may be made to involve various facets of the university including administration, faculty, and facility maintenance to aid in the implementation of the SPCC Plan and/ or spill response activities. Provided in the table below are additional members of the KSU staff that may partake in activities associated with this plan.

SPCC Program Contacts

Program Element	Name	Title	Contact Number
Designated Person/ Team Leader	Terran Terrell	Environmental Programs Manager	470-578-5026
First Alternate	Gary Paoletta	Director MEP Operations	770-658-8491
Overall Program	Stephen Ndiritu	Director, Environmental Health & Safety	470-578-2410
Storm Water System Design	Richard Rhodes	Director, Design and Construction	470-578-3046
Hazardous Materials and Lab Safety	Rodrick Esaw	Senior Research Safety & Biosafety Compliance Officer	470-578-4803
Hazardous Materials	Joe Clinton	Hazardous Materials Specialist	470-578-2089
Facilities – Plant Operations	Donald Spencer	Campus Maintenance Manager	470-578-7943
Ground Keeping Operations	John Hofelich	Grounds Superintendent	470-578-6224
Waste Management	Fola Teru	Director of Building Services	470-578-6224
Commercial Kitchen Operations	Jenifer Duggan	Executive Director, University Dining	470-578-2981
Vehicle/equipment Maintenance	Aimee Wiederhold	Fleet Services Coordinator	470-578-6224
Covered Vehicle Parking	Dr. Tyrone Smiley	Director of Parking Operations	470-578-6506

APPENDIX P

Standard Notification and Reporting Form (Note - Use any state or local required forms that may exist)

Facility:	Kennesaw State University – Marietta Campus 1100 South Marietta Parkway Marietta, Cobb County, GA 30060
Owner/operator:	Kennesaw State University – Marietta Campus 1100 South Marietta Parkway Marietta, Cobb County, GA 30060
Maximum storage/handling capacity of the facility:	19,838 - gallons
Name, address, and telephone number of person filing report:	
Date and time of discharge:	
Specific location of discharge:	
Description of the substance discharged:	
Estimated quantity discharged:	
Duration of the incident:	
Weather conditions at the incident location:	
Name of surface water or description of water affected or threatened by discharge:	

Source of the discharge:	
Cause of discharge and failure analysis:	
Description of actual or potential environmental pollution or impacts:	
Name, address, and telephone number of Designated Person or Responsible Individual at the location of the discharge:	
Response actions taken, being taken, or which should be taken to contain or respond to the discharge:	
Known or anticipated health risks:	
Number and types of injuries (if applicable):	
Identity of regulatory agencies responding to the discharge:	
Additional preventive measures taken or contemplated to minimize possibility of recurrence:	
Additional pertinent information:	

The Georgia Environmental Protection Division (GAEPD) defines a "reportable release" as either a spill of an unknown amount and/or an amount that creates a significant sheen on top of state waters or creates an emulsion or sludge under state waters.

The GAEPD must be notified of a reportable release immediately upon having knowledge of a spill/release. The United States Environmental Protection Agency defines immediately to mean within 15 minutes.

APPENDIX Q

Oil Spill Contingency Plan

1.0 OIL SPILL CONTINGNECY PLAN

In the absence of adequate secondary containment for oil-filled equipment, aboveground flowlines and intra-facility gathering lines, this Oil Spill Contingency Plan (Contingency Plan) has been prepared following the provisions of 40 CFR Part 112.9(d)(3) and 40 CFR 109 and provides a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful. The purpose of this Contingency Plan is to minimize damage resulting from such discharges by providing timely, efficient, coordinated, and effective response actions.

The spill response team, comprised of trained facility employees, will initiate, support, or completely implement the spill response activities. The degree of involvement from internal personnel will depend on the magnitude of the release. Assuming the release can be handled by internal personnel, below summarizes the proper actions to be taken immediately for each spill situation.

- **Containment of Spills on Land:** If oil or oil-based products are released to the ground surface, then appropriate containment facilities will be constructed. A simple, easily field constructed type of containment device is an earthen dam. If the spill is small, then absorbent material will be spread and collected for proper disposal. Response measures preventing the flow of the release to stormwater collection points should be implemented as soon as possible.

- **Containment of Spills in Shallow Water:** Absorbent booms will be used to contain spills in shallow waters. The size and type of boom will be determined based on the depth of water and amount of product spilled. Oil layers on water would be recovered using vacuum trucks, portable skimmers, or other appropriate methods depending on the amount of oil present.

- **Recovery of Spills on Land:** Free product trapped in containment devices will be removed using a vacuum truck and properly recycled, recovered, or disposed. Residual thin layers of oil will be cleaned by using sorbents, emulsifying agents, or bioremediation techniques. Spills that affect only shallow soils, will be excavated and removed as appropriate.

2.0 RESPONSIBILITIES

The authorities, responsibilities, and duties of personnel, organizations, or agencies which may be involved in the direction and implementation of this Contingency Plan are operationally defined in the following subsections. Additional information is also presented in the SPCC Plan.

2.1 Planned Response Action/ Emergency Action Checklist

An emergency action checklist below contains alert procedures which become effective immediately upon the observance of or hearing of an oil spill from the site. KSU - Marietta personnel observing or receiving knowledge of an oil spill must immediately take actions to minimize injuries and damage and notify the Designated Person. Steps on the action checklist should be taken in accordance with good safety practices. The priority in all circumstances will be to protect life. An operator will forward

emergency situation information to the appropriate company employee. The first nine action steps will be as outlined below.

Emergency Action Checklist:

- Evaluate situation for personnel safety hazards. Provide safe rescue of personnel and provide first aid as required.
- Shut down the operation in progress following pre-established procedures to prevent further damage. Obtain positive product identification.
- Conduct investigation to determine the source, utilizing appropriate personnel protection equipment (PPE).
- Secure the source or minimize the potential discharge by transferring or isolating product.
- Conduct containment activities, as appropriate, to minimize the spread of oil.
- Contact facility person in charge. Transmit the information as shown below.
- Simultaneously with other activities, contact emergency response officials (Federal, State, and Local)
- Contact previously identified entities that could be impacted by the spill.
- Begin preparation for product recovery and remediation activities.

3.0 INTERNAL ALERT PROCEDURES

In general, KSU - Marietta will be responsible to provide immediate response to a spill. As outlined below, the following conditions will be assessed and reported to the Designated Person:

- Damages or injuries caused by the spill;
- Actions being used to stop, remove and mitigate the effects of the discharge;
- Whether an evacuation may be needed;
- The spill date and time;
- The type of material spilled;
- Estimates of the total quantity spilled;
- Estimates of the quantity spilled into navigable waters;
- The source and cause of the spill; and
- A description of the affected medium (air, water, and soil).

The person observing or receiving a spill notice will notify one of the following people:

- Person in Charge: See Appendix N of the SPCC Plan for the Designated Person(s) accountable and for prioritized call list.
- Other Company Personnel: Other personnel may be designated by the Person in Charge in the event they are unable to respond.

4.0 EXTERNAL ALERT PROCEDURES

Georgia has not established any state-specific requirements for spill prevention and control or spill reporting requirements in addition to those required by 40 CFR 112. In the event of a spill or discharge of hazardous substances or oil KSU - Marietta is required to notify the Georgia Emergency Management Agency (404-635-7000) and the Georgia Environmental Protection Division (EPD) Emergency

Operations Center (800-241-4113), as well as the appropriate GEPD Field Office (Mountain District Field Office at 404-362-2671 or 404-362-2712).

KSU - Marietta is responsible for the notification and reporting of applicable releases to the appropriate agencies as soon as possible to provide relevant information about the spill. Notification may be made in any reasonable manner including telephone, in person, or by other agency-approved method.

KSU - Marietta will also notify appropriate agencies as soon as possible whenever necessary to provide information that would trigger a change in the response to the spill or discharge. If the discharge or spill creates an imminent health threat, the Designated Person must immediately notify and coordinate with local emergency authorities (fire department, fire marshal, law enforcement, health authority, or Local Emergency Planning Committee [LEPC], as appropriate).

A list of Emergency Contacts is included in Appendix N. A Standard Notification and Reporting Form (Appendix O) will be completed immediately upon detection of a discharge and can be used to report a spill. Additional notification and reporting requirements are addressed in Section 5.4 of the SPCC Plan.

5.0 SPILL MANAGEMENT TEAM

Responsibilities of members of the team are listed below. A person may perform more than one task and may assume the duties of other team members. Members of the Spill Management Team include but are not limited to:

Responsibility	Name	Contact Number
Designated Person	Environmental Programs Manager – Terran Terrell	470-578-5026
Operations (Alternate Qualified Individual)	Director MEP Operations - Gary Paoletta	770-658-8491
On-the-Scene Coordinator/ Qualified Individual Safety Regulatory and Ecological Evaluation Field Communications Investigations Logistics	Environmental Programs Manager – Terran Terrell	470-578-5026

Financial		
Non-supervisory Field Personnel	Varies	Varies

Responsibilities of the Spill Management Team are outlined below.

Non-Supervisory Field Personnel

- Shut off the source of the spill and secure operations to prevent safety or fire hazards from developing.
- Begin containment and cleanup operations as directed by the Facility Operator/On-the-Scene Coordinator.

On-the-Scene Coordinator/Qualified Individual

- Ensure that proper notifications have been made.
- Ensure that the source of the spill and ignition sources have been secured, to prevent additional contamination.
- Conduct initial safety meeting.
- Assess the size and impact (environmental and economic) of the spill.
- Authorize and request mobilization of additional personnel and equipment as needed.
- Convene planning meeting as soon as possible after initial mitigation steps have been completed.
- Prepare site specific response plan for the containment and cleanup of the spill.
- Ensure that liaison is established and maintained with federal and state on-scene-commanders.
- Ensure that all spill-related activities are documented.

Operations (Alternate Qualified Individual)

- Receive the report of the spill from the Facility Operator and give directions as needed.
- Contact appropriate agencies if an uncontrolled spill has occurred into water.

Safety

- Establish as needed a security zone around the spill site and control access into the operations area.
- Ensure all company and contract personnel responding to the spill are properly trained and certified.
- Conduct safety meetings as needed to insure all personnel understand the company safety plan.

Logistics

- Arrange for sanitary facilities, transportation, food and lodging as needed for the spill work force.
- Determine the availability/location of cleanup equipment and personnel.
- Provide transportation for moving personnel and equipment from the central receiving location to the spill site.
- As needed, provide transportation services at the spill site for operations such as wildlife rescue, surveillance, salvage, waste disposal, etc.

Financial

- Maintain a daily accounting for all costs related to the spill response.
- Establish an accounting to verify contractor commitment of manpower, equipment and materials.
- Prepare a report on total response costs that includes company and contract costs.

Field Communications

- Ensure adequate communication nets for operations in the field are properly staffed and equipment is maintained.

Regulatory and Ecological Evaluation

- Keep the appropriate environmental regulatory agencies notified and informed on the status of response operations and their impact on the environment.
- Prepare permit applications and obtain necessary government agency approvals or environmentally related permits.
- Evaluate and recommend the need for additional support in terms of environmental consultants and contractor services.
- Assist with post-spill evaluation of cleanup and recovery techniques.
- Obtain all necessary permits and approvals to manage the oil and oily waste.

Investigations

- Investigate, report, and record safety-related accidents that occur during response operations, and develop remedial actions to avoid future occurrences.

6.0 COMMUNICATIONS

The following communication networks will be established:

Communications with Designated Person:
Environmental Programs Manager: Terran Terrell (470-578-5026)

Communications with Safety and Medical:
KSU Marietta Police (470-578-6206)
Campus Emergency (470-578-6666)
Marietta Fire Department (911)
Wellstar Kennestone Hospital at 677 Church St., Marietta, GA (770-793-5000)

Response crews and On-the-Scene Coordinator:
Environmental Programs Manager: Terran Terrell (470-578-5026)
Marietta Power (transformers): Emergency line (770-794-5160)

Potential Emergency Response/ Cleanup Contractors:

- Full Circle Restoration (770-232-9797)
- Remtech Engineers – Marietta (not under contract) (800-377-3648)
- Georgia Environmental Protection Division (EPD) – 24 Hour Spill Hotline (800-241-4113)

7.0 PLANS FOR SAMPLING, TESTING, AND MEASURING THE VOLUME OF SUBSTANCES DISCHARGED

Delineation of the contaminated area will follow guidelines established by the local and/or state agency, Georgia Environmental Protection Division (EPD).

7.1 Plans for the Recovery, Storage, Separation, Transportation, and Disposal of Waste

Vacuum trucks will remove accumulated liquids and return the liquids to the production system for recycling and recovery of any oil or will haul the liquids to an approved disposal facility. Only carriers who are in compliance with federal, state and local regulations will be utilized to transport liquids. The liquids will be hauled to sites that are also in compliance with federal, state and local regulations. Manifests (run tickets) will be obtained on the liquids hauled. This manifest must include the following information:

- Facility source of fluids.
- Name and address of transporter.
- Volume, in barrels, of fluids hauled.
- Disposal point identification by name, location, and current state regulatory disposal number.
- Disposal point National Pollutant Discharge Elimination System number, if applicable.

Soil remediation, if needed, will follow appropriate regulatory guidelines.

KENNESAW STATE UNIVERSITY

APPENDIX R

SPCC Deficiencies and Corrective Actions

SPCC Concern	Recommendation	Responsible Person	Correction Date