

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES (SPCC) PLAN



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LIST OF ATTACHMENTS

1.0 Introduction

1.1 Preparation Requirements ±40 CFR 112.3

This Spill Prevention, Control, and Countermeasures (SPCC) Plan has been prepared and LPSOHPHQWHG IRU 2OG 'RPLQLRQ 8QLYHUVLW\ 2'8 LQ 1RUIRON Environmental Protection Agency (EPA) regulations contained in Title 40 *Code of Federal Regulations* Part 112 (40 CFR 112). ODU is a non-transportation, non-oil production on-shore facility and is subject to SPCC regulations if:

- 1) Due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters of the United States;
- 2) The total aboveground storage capacity exceeds 1,320 gallons (calculated as a total of tanks and containers with capacity of 55 gallons or more); and/or
- 3) The completely buried storage capacity of non-regulated tanks exceeds 42,000 gallons.

The SPCC plan is not required to be filed with EPA, but a copy must be available for on-site review by the Regional Administrator during normal working hours if the subject facility is attended at least 4 hours a day. The SPCC plan must be submitted to the EPA Region III Regional Administrator and the state agency in charge of oil pollution control (the Department of Environmental Quality ±DEQ) along with the other information specified in 40 CFR 112.4 if either of the following occurs:

- f* The facility discharges more than 1,000 gallons of oil into or upon navigable waters of the United States or adjoining shorelines in a single event; or
- f* The facility discharges more than 42 gallons of oil more than twice within any 12-month period.

Sections of the SPCC Regulations that were not applicable to this facility are not included in this document.

1.2 Reporting Requirements ±40 CFR 112.4

Discharge information must be reported to EPA Region III and DEQ within 60 days if either of the above thresholds is exceeded. The report is to contain the following information:

1. Name of the facility;
2. Name of the owner or operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility;
5. Corrective actions and/or countermeasures taken, including a description of equipment repairs and/or replacements;
6. An adequate description of the facility, including maps, as necessary;
7. The cause of such discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;

8. Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and
9. Such other information the Regional Administrator may require pertinent to the Plan or discharge.

2.0 SPCC Plan Review and Amendment ±40 CFR 112.5

The SPCC Plan shall be amended within 6 months whenever there is a change in facility design, FRQ V W U X F W L R Q R S H U D W L R Q R U P D L Q W H Q D Q F H W K D W P D W H U L Amendments must be implemented as soon as possible, but no later than six months following the preparation of the amendment.

The plan must be reviewed once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a discharge event and has been proven in the field. The SPCC review must be documented and the statement located in Attachment E of this document must be signed. All technical amendments must be certified by a registered professional engineer.

3.0 General Requirements - 40 CFR 112.7

Old Dominion University is a state-assisted educational institution located in the city of Norfolk, Virginia. This institution is comprised of various buildings and parking lots and operates as a higher education institute for on-site and commuter students. The University campus currently handles and stores petroleum products in the form of #2 fuel oil and gasoline. The figures in Attachment A show the property, drainage structures, buildings on site, and oil storage locations.

3.1 Container Descriptions

Table 1: AST Capacity Details.			
Building	Contents	Size	Location
Constant Hall	#2 oil	221	East side of building attached to generator
Ted Constant Convocation Center	#2 oil	850	South side of building attached to generator
Ireland	#2 oil	425	South eastern side of building attached to generator
Scotland	#2 oil	425	North side of building
Virginia	#2 oil	425	South side of building attached to generator
England House	#2 oil	425	South side of the building
France House	#2 oil	425	North side of the building
Diehn Fine and Performing Arts	#2 oil	150	West side of building in fenced/locked area
E.V. Williams Engineering and Computational Sciences	#2 oil	5,000	Northeast end of building attached to generator
Dragas & Hughes Hall	#2 oil	800	West side of building
Oceanography and Physics	#2 oil	300	South side near loading dock attached to generator
Perry Library	#2 oil	300	South side near loading dock attached to generator
VBHEC	#2 oil	173	North side of building
Orchid Conservatory	#2 oil	145	North side of building
Tri-Cities	#2 oil	305	North side of building
Game day	#2 oil	250	West side of stadium west near lot 6
VMASC	#2 oil	950	Northeast side of building
Stadium East	Diesel	200	Southeast corner of Koch Hall
Stadium West	#2 oil	500	West side near lot 6
Facilities Management	Diesel	1000	SE side near the building

Total AST Storage: 13,269 gallons.

Table 2: UST Capacity Details.			
Building	Contents	Size	Location

3.2 Discharge Prevention and Control Measures

- f* Aboveground storage tanks, drums, and containers will all be located within secondary containment (even those indoors). Those which a

3.5 Emergency Phone Numbers

The following is a prioritized list of contacts in the event of a discharge or substantial threat of a discharge.

- a. ODU Public Safety (757) 683-4000
- b. City of Norfolk Haz-Mat Response Team through ODU Public Safety
- c.

3.9 Inspections, Tests, and Records

All records, inspections, and tests described in this report must be signed by the appropriate supervisor and kept with the SPCC Plan for a period of three years.

3.10 Personnel Training

ODU personnel are trained in the operation and maintenance of equipment used to prevent discharges, discharge procedure protocols, applicable pollution control laws, rules and regulations; general facility operations, and the contents of this plan. The Director of Environmental Health and Safety is designated to be accountable for discharge prevention. This person reports directly to management.

Discharge prevention briefings are conducted annually for all oil-handling personnel. This training is to ensure that personnel have an adequate understanding of the SPCC Plan. The briefing also highlights known discharges or failures (if applicable), malfunctioning components, and any new precautionary measures.

Records of briefings are kept in Appendix C.

3.11 Security

1. All ASTs are locked within buildings and/or fencing at all times.
2. All ASTs are located within well illuminated areas of the campus.

4.0 Requirements for Onshore Facilities ±40 CFR 112.8

4.1 Drainage

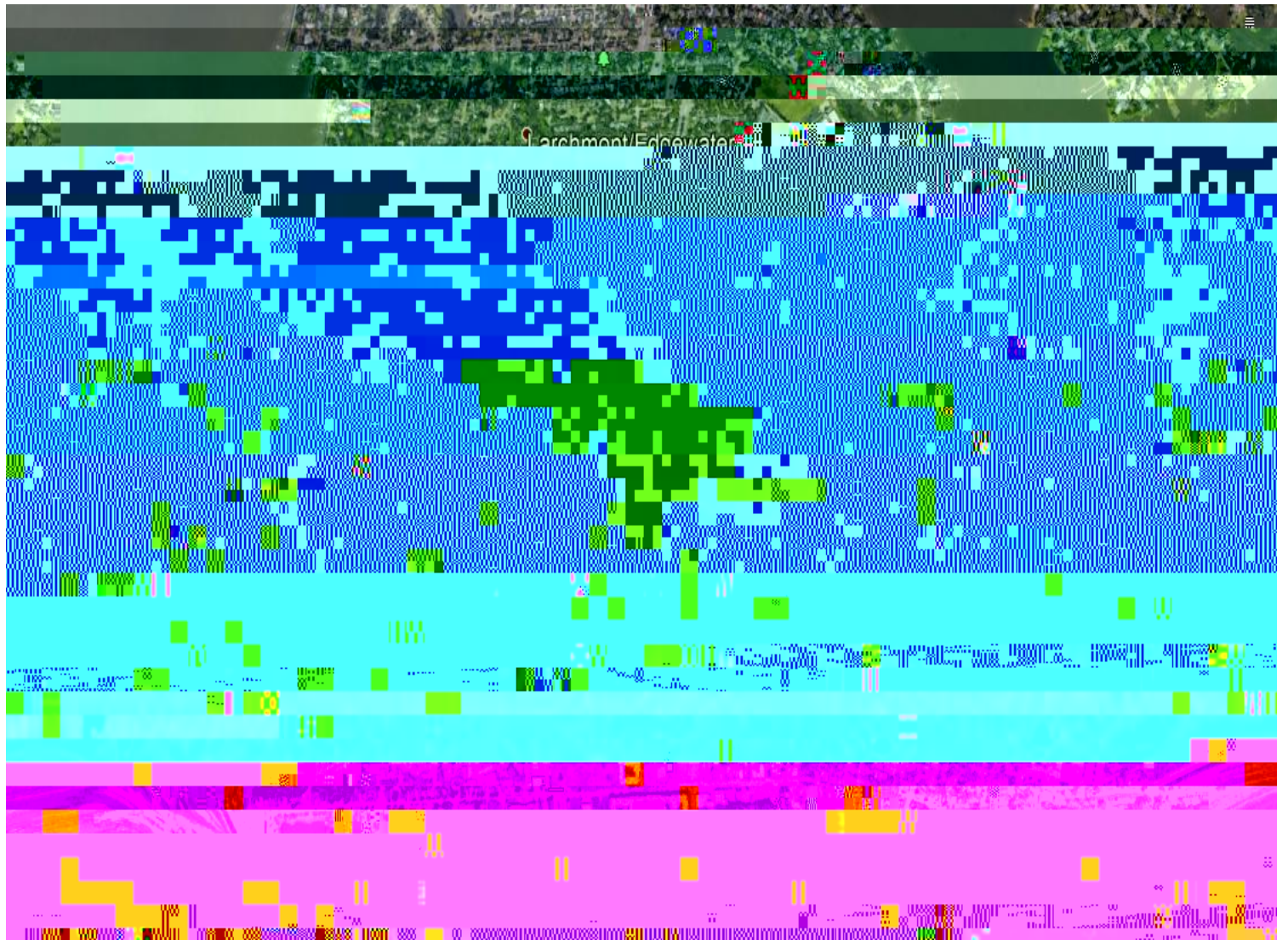
destructive shell thickness testing, including inspection of container supports and foundations. Comparison records are maintained.

f There are no non-internal heating coils at this facility.

f Oil leaks that result in a loss of oil from container seams, gaskets, rivets, and bolts are promptly corrected.

4.3 Facility Transfer Operations

All aboveground valves, piping (lines), and appurtenances should be inspected regularly. The general condition of these items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces should be assessed.



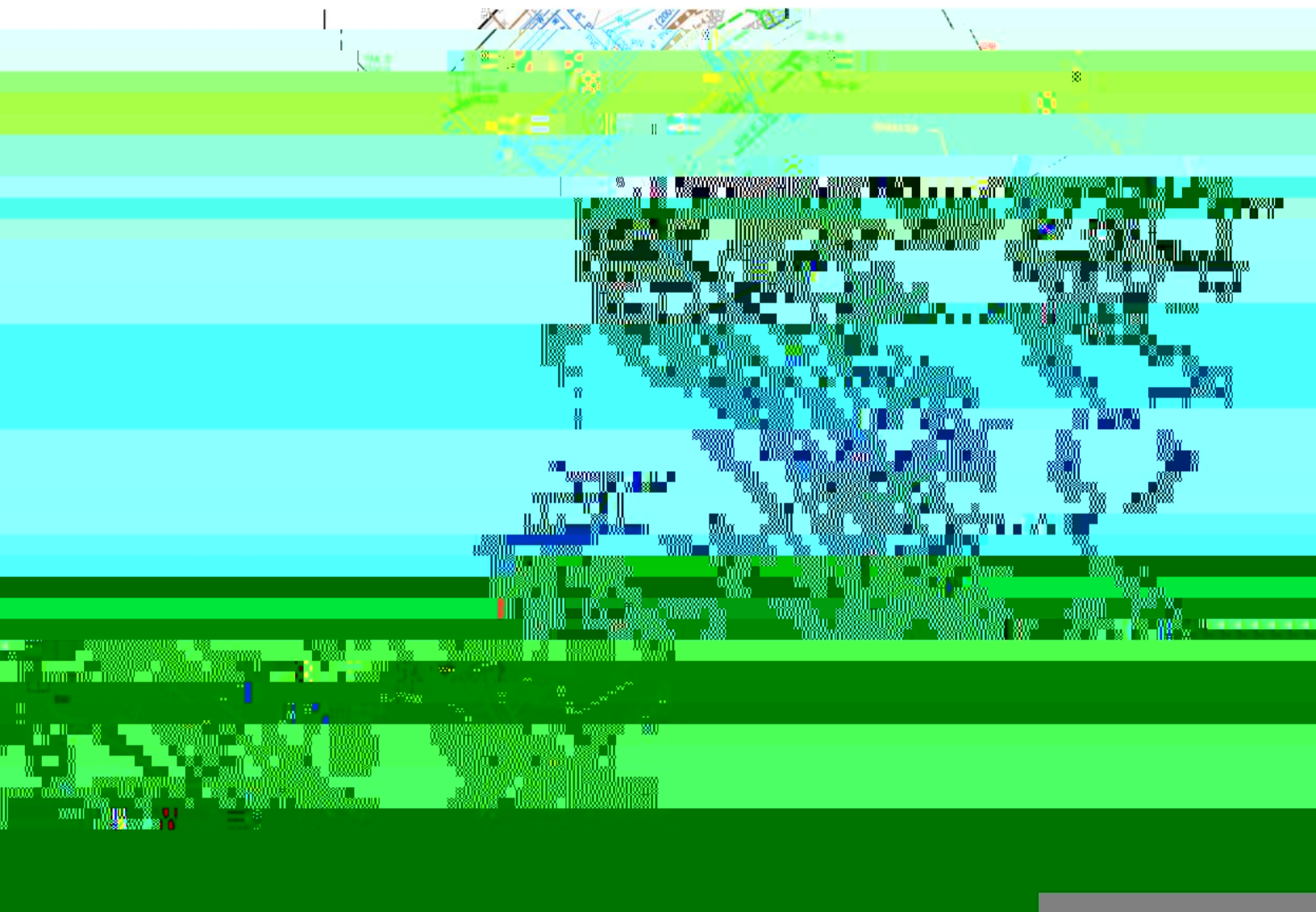



Figure 2

Figure 3

NOT TO SCALE



Figure 4

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Diehn Fine & Performing Arts Center & Webb University Center</p> <p>Old Dominion University Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (UST) </p>
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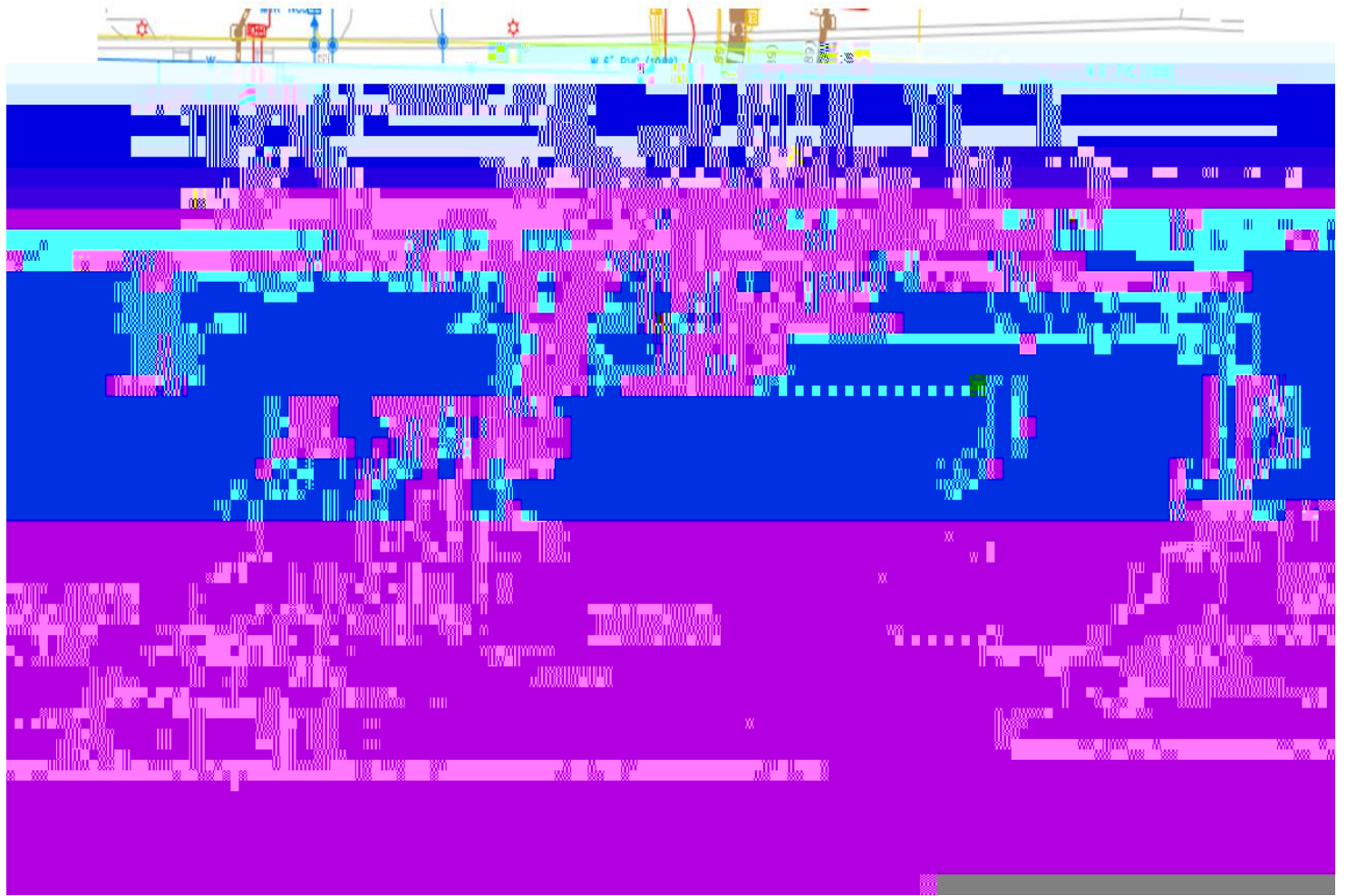


Figure 5

NOT TO SCALE


Date: 02/19/2021

Office of Environmental
Health & Safety

Visual Arts & Dragas Hall

Old Dominion University
Norfolk, Virginia

Legend:

Fuel tank (AST) 


Fuel tank (UST) 

Figure 6

NOT TO SCALE

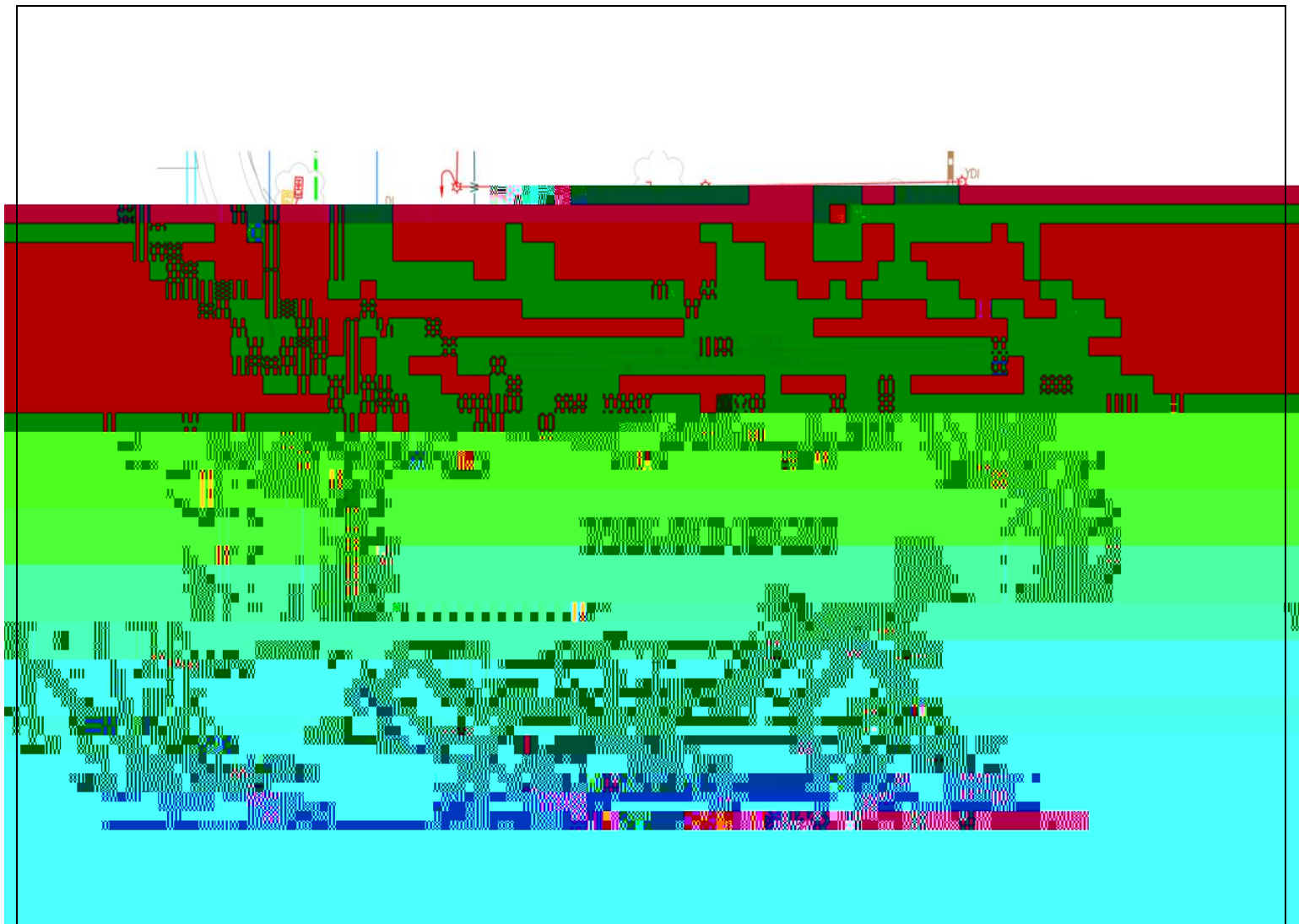



Figure 7

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>England House</p> <p>Old Dominion University</p> <p>Norfolk, Virginia</p>	<p>Legend:</p> <p>Fuel tank (AST) </p>
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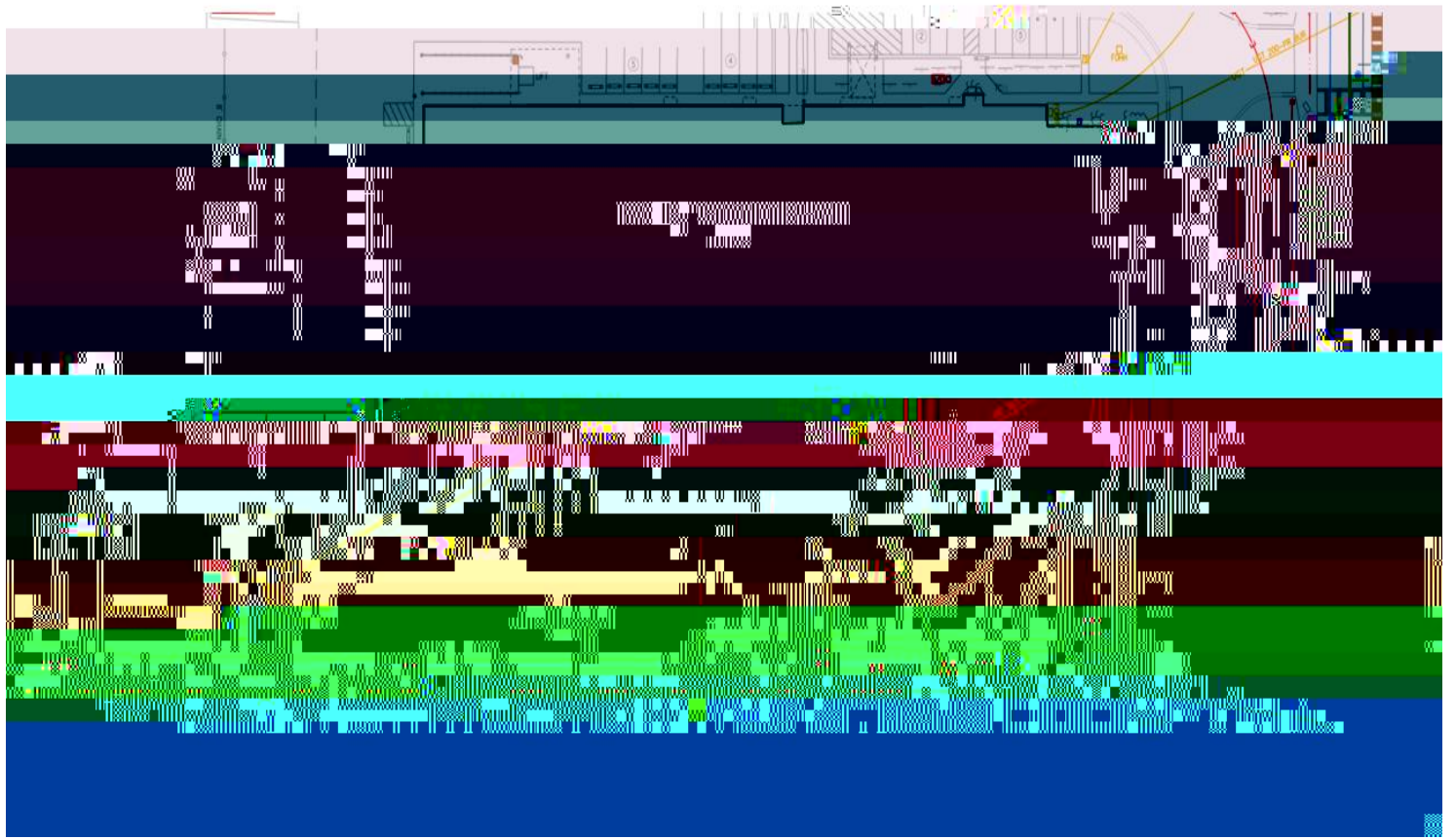




Figure 8

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Facilities Management</p> <p>Old Dominion University</p> <p>Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (AST) </p> <p>Fuel tank (UST) </p>
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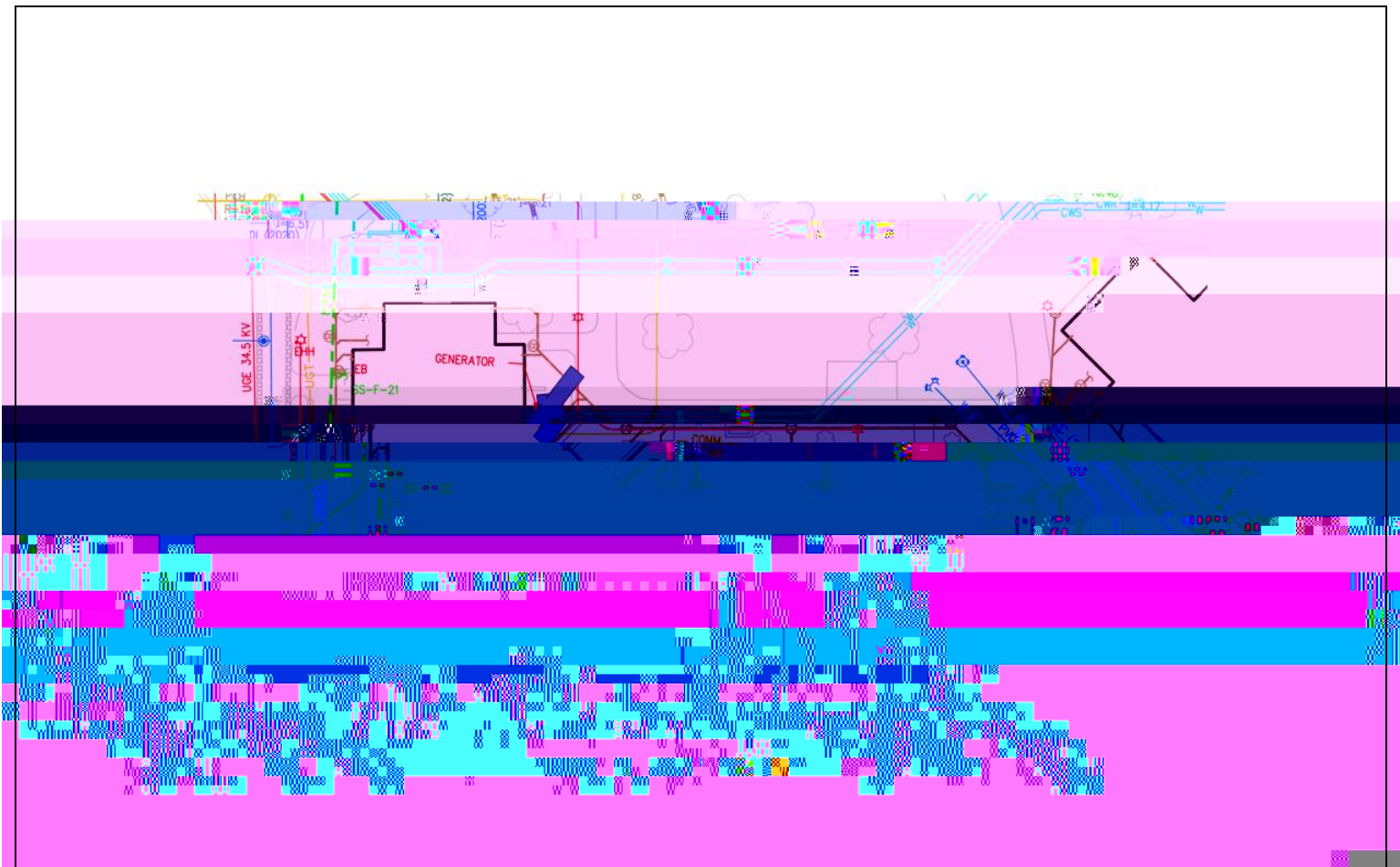



Figure 9

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>France House</p> <p>Old Dominion University</p> <p>Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (AST) </p>
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Perry Library

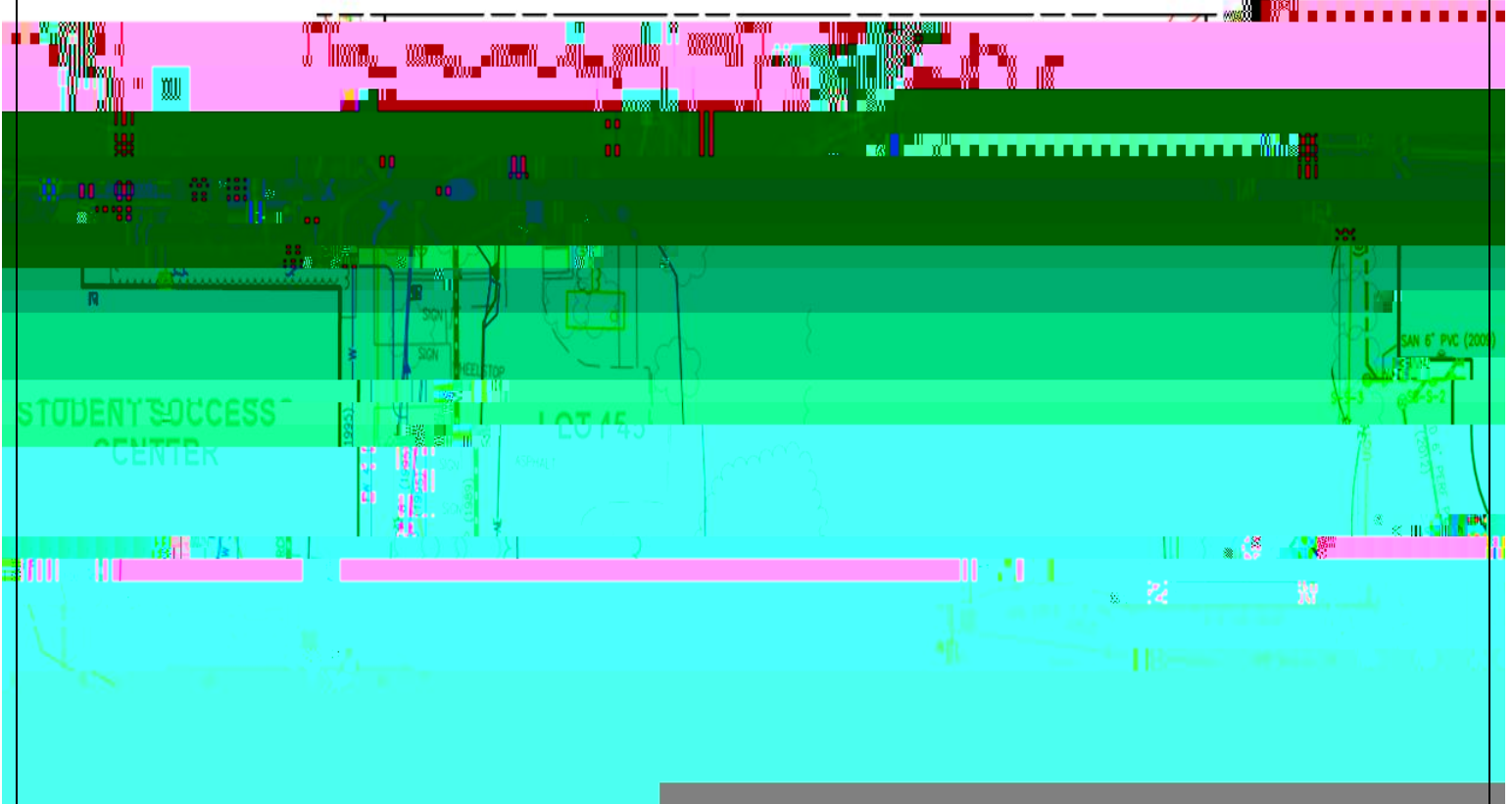


Figure 10

NOT TO SCALE

Date: 02/19/2021

Office of Environmental
Health & Safety

Perry Library & Student Success Center

Old Dominion University
Norfolk, Virginia

Legend:

Fuel tank (AST) 



Figure 11


<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Rollins Hall & Spong Hall</p> <p>Old Dominion University Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (UST) </p>
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Figure 12

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Oceanography & Physical Sciences</p> <p>Old Dominion University Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (AST)</p>
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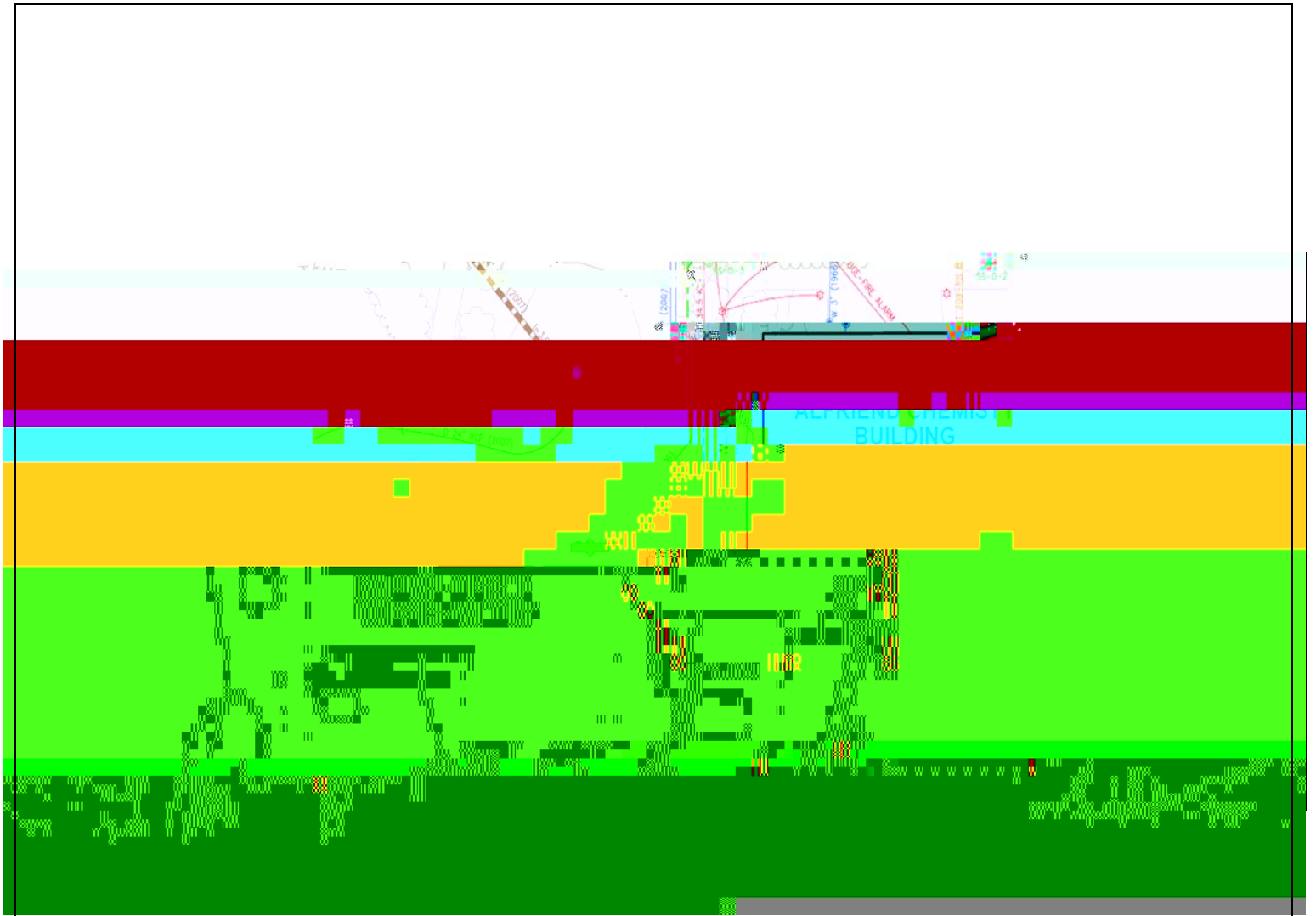



Figure 13

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Kaplan Orchid Conservatory</p> <p>Old Dominion University</p> <p>Norfolk, Virginia</p>	<p>Legend:</p> <p>Fuel tank (AST) </p>
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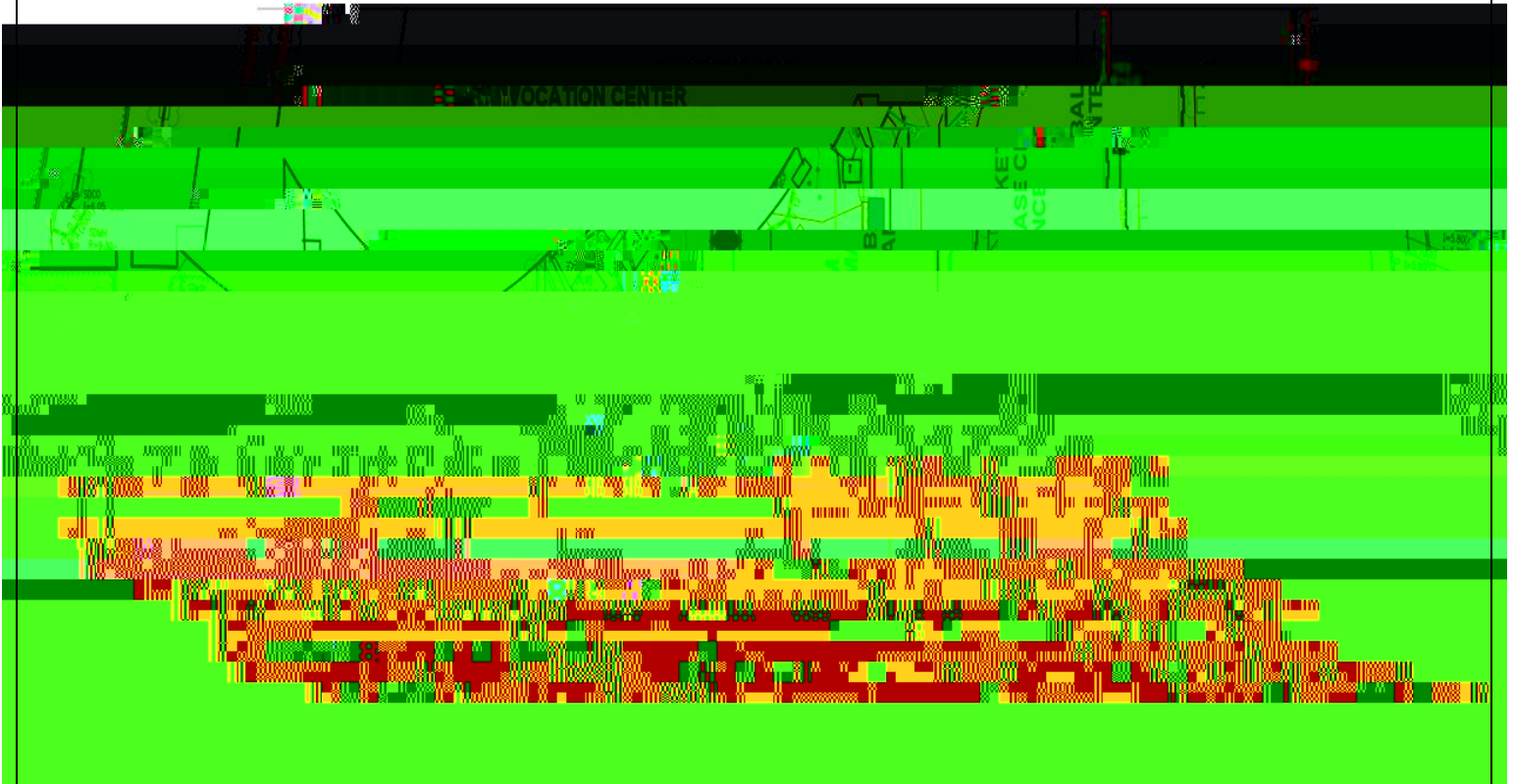



Figure 14

<p>NOT TO SCALE</p> <p>Date: 02/19/2021</p> <p>Office of Environmental Health & Safety</p>	<p>Ted Constant Convocation Center</p> <p>Old Dominion University</p> <p>Norfolk, Virginia</p>	<p><u>Legend:</u></p> <p>Fuel tank (AST) </p>
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Attachment B: Facility Inspection and Test Records

At least describe the condition of the back of this sheet and notify the EH&SO immediately.

Tanks

Tank surface or area above/around tank shows signs of leakage

Tank system is damaged, rusted or deteriorated

Tank Supports are deteriorated or buckled

Tank foundations have eroded or settled

France House

#2 oil

DW steel

RECORD OF DISCHARGE PREVENTION BRIEFINGS

In accordance with the requirements of 40 CFR 112.7(f), this record of discharge prevention briefings for oil handling personnel will be completed at least once every year. The briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently

Attachment D: Certification of Substantial Harm

Attachment E: SPCC Review Certification

SPCC Review Certification

The facility owner or