



# Spill Prevention Control and Countermeasure Plan

## Fact Sheet

Issue Date: 09/01/10

Revision Date: 07/05/23

**Applies To:** University of Michigan locations that store oil.

United States Environmental Protection Agency (USEPA) Regulation, 40 CFR Part 112, was written and adopted in 1973 and requires facilities to prepare and implement a Spill Prevention Control and Countermeasure Plan (SPCC) to prevent discharge of oil into navigable waters or adjoining shorelines of the United States. "Oil" according to 40 CFR Part 112 is oil of any kind or in any form, including but not limited to petroleum, fuel oil, sludge, oil refuse, kitchen and animal grease, and oil mixed with wastes.

Facilities are required to prepare and implement an SPCC Plan if it has a total underground storage capacity greater than 42,000 gallons or an aggregate storage capacity greater than 1,320 gallons; and if there is a reasonable expectation that a discharge could reach navigable waterways.

Because the University of Michigan (U-M) is considered one facility, its underground storage and aggregate storage capacity exceeds the limits. In addition, it is a reasonable expectation that a discharge of oil could reach the Huron River.

## Elements of the U-M-SPCC Plan

A Written Plan, which <b>must</b> include	<ul style="list-style-type: none"> <li>• Facility spill history</li> <li>• Facility drainage</li> <li>• Secondary containment</li> <li>• Site security</li> <li>• Oil storage inspection records</li> <li>• Training and spill briefing records, and</li> <li>• Plan <b>must</b> be certified by a Professional Engineer every five years</li> </ul>
Oil Storage Management/Control Practices	<ul style="list-style-type: none"> <li>• Lighting</li> <li>• Security</li> <li>• Secondary Containment</li> <li>• Catchment during loading/unloading of fuel</li> </ul>
Personnel Involvement	<ul style="list-style-type: none"> <li>• Inspections</li> <li>• Spill prevention and spill control</li> <li>• Recordkeeping</li> </ul>

---

## ***Inspection Schedule for Storage Containers included in the U-M SPCC Plan***

The following storage containers are included in U-M's SPCC Plan. Each container that is 55-gallons or greater must be inspected. The inspection requirements are:

<b>STORAGE CONTAINER</b>	<b>INSPECTED EVERY...</b>
UST, ASTs, Emergency Generators and 55-gallon drums	Month
Oil Interceptors	Six months
Transformers	Four months
Elevator Hydraulic Reservoirs	Three months

Inspection records **must** be maintained on site for five years and be available if requested by state or federal inspectors. (USEPA/ Environment, Great Lakes, and Energy (EGLE))

An Environment, Health & Safety (EHS) representative will perform follow up visits annually to review the inspection checklists.

The inspection checklists and SPCC plans will be provided by EHS.

---

## **Spill Response**

In case of a spill, take action to clean the spill and prevent the discharge from reaching navigable waters.

- Place oil dry on the spill or use absorbent socks to contain it as much as possible, and if needed, and call Hazardous Materials Management at (734) 763-4568 to complete the cleanup. Call HMM for proper disposal of cleanup material.
- For major spills, spills that enter a sanitary/storm drain, or reach a navigable water or surface water, contact HMM at (734) 763-4568 or 911 if EHS is unavailable or it's after hours.

---

## **Training**

All personnel **must** be trained and be familiar with the operations of the equipment on site according to 40 CFR Part 112.7 (f). The owners or operators are responsible for properly instructing personnel in the operation and maintenance of the equipment to prevent the discharge of oil and about the applicable pollution control laws, rules and regulations, which are briefly stated in this document.

The initial training will be conducted by an EHS representative. Additional training will be conducted by an EHS representative on an annual basis to update employees on changes in the regulations, laws, or in-house procedures.

---

## **Unscheduled Inspections by the Federal or State Inspectors**

**If an USEPA or EGLE inspector arrives on site, call Environmental Protection & Permitting at (734) 647-1143 to request for an EHS representative to be present.**

If there are any questions, contact Environmental Protection & Permitting at (734) 647-1143.

---

### **Revision History**

<b>REVISION #</b>	<b>DATE</b>	<b>REVISION #</b>	<b>DATE</b>	<b>REVISION #</b>	<b>DATE</b>	<b>REVISION #</b>	<b>DATE</b>
1	9/10	3	7/23				
2	7/18						