Spill Prevention Control and Countermeasure Plan

The University of Alabama at Birmingham
Department of Occupational Health and Safety

June 8, 2009
TABLE OF CONTENTS

1.0 INTRODUCTION

2.0 ADMINISTRATION
   2.1 POLICY
   2.2 CERTIFICATION (40CFR112.3(d))
   2.3 COVERAGE
   2.4 ADMINISTRATION OF RESPONSIBILITY
   2.5 INSPECTIONS AND NONCONFORMANCE
   2.6 RECORD-KEEPING REQUIREMENTS
   2.7 PLAN LOCATION
   2.8 PLAN REVIEW & CHANGES

3.0 FACILITY DESCRIPTION
   3.1 FLOOD DRAINAGE

4.0 OIL STORAGE — DESCRIPTION, USE & LOCATION
   4.1 THE UNIVERSITY OF ALABAMA AT BIRMINGHAM’S UST’S AND AST’S
   4.2 TRANSFORMERS
   4.3 WASTE OIL
   4.4 MISCELLANEOUS OIL STORAGE
   4.5 EMERGENCY GENERATORS

5.0 SPILL ESTIMATES AND PATHWAYS
   5.1 TANK FILLING OPERATIONS
   5.2 TANK FAILURE
   5.3 FUEL DISPENSING OPERATIONS
   5.4 TRANSFORMERS
   5.5 WASTE OIL
   5.6 MISCELLANEOUS OIL STORAGE

6.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURES (112.7(a)(3)(ii))
   6.1 MINIMUM AST SPILL PREVENTION CONTROLS
   6.2 MINIMUM UST SPILL PREVENTION CONTROLS
   6.3 OVERFILLS & OIL TRANSFER OPERATIONS (112.7(h))
   6.4 DIESEL AND GASOLINE DISPENSING
   6.5 PIPING FAILURE
   6.6 PRIMARY TANK FAILURE
   6.7 ACCIDENTAL DRUM/CONTAINER SPILL
   6.8 EMERGENCY EQUIPMENT
7.0 SPILL/RELEASE RESPONSE & REPORTING PROCEDURES
   7.1 EMERGENCY COORDINATOR
   7.2 EMERGENCY COORDINATOR ASSUMES CONTROL
   7.3 SUMMONS OF OUTSIDE SUPPORT
   7.4 REGULATORY AGENCIES
   7.5 EMERGENCY COORDINATOR’S RESPONSIBILITY

8.0 DISPOSAL OF SPILL MATERIALS

9.0 PAST SPILL EVENTS

10.0 TRAINING PROGRAMS

11.0 SECURITY

12.0 AMENDMENTS, CHANGES, REVIEWS AND COPIES OF PLAN/AGREEMENTS
   12.1 PLAN REVIEW

13.0 PROPOSED CORRECTIVE MEASURES
LIST OF TABLES, APPENDICES AND FIGURES

TABLE 1 – ABOVEGROUND STORAGE TANK INVENTORY
TABLE 2 – UNDERGROUND STORAGE TANK INVENTORY
TABLE 3 – TRANSFORMER INVENTORY
TABLE 4 - DRUM INVENTORY
TABLE 5 – HYDRAULIC ELEVATOR INVENTORY
APPENDIX I – EXTERNAL EMERGENCY CONTACTS AND RESPONSE SERVICES
APPENDIX II – NOTIFICATION LIST
APPENDIX III – PAST SPILL EVENTS
APPENDIX IV - CERTIFICATION FOR FACILITIES THAT DO NOT POSE SUBSTANTIAL HARM
APPENDIX V – INSPECTION FORMS (AST & UST)
FIGURE 1 – FACILITY SITE PLAN
FIGURE 2 – HYDRAULIC ELEVATORS LOCATIONS
1.0 INTRODUCTION

The Oil Spill Prevention Regulations (40 CFR Part 112) are a part of the federal Clean Water Act. The regulations require that certain facilities prepare and implement a Spill Prevention, Control and Countermeasure (SPCC) Plan. The University of Alabama at Birmingham is required to have a plan since the campus stores more than 42,000 gallons of oil below ground and 1,320 gallons of oil above ground and because it could reasonably be expected under a worst-case scenario that oil could discharge to a navigable water of the United States via the campus’ storm drainage system.

The guidelines specified in this Plan identify standards and procedures, responsibilities, control measures, resources and work practices that are necessary to minimize the possibility of a discharge and to ensure adequate response in the event of a release of oil into the navigable waters of the United States.

Copies of this Plan are at the following locations:
- Facilities Management
- The Department of Occupational Health and Safety; and
- Made available to all applicable fire safety, OH&S and facilities personnel at the University of Alabama at Birmingham (UAB)
2.0 ADMINISTRATION

2.1 Policy

The University of Alabama at Birmingham, located at 701 20th Street South, Birmingham, Alabama, will operate its facility in compliance with the rules and regulations applicable to its site-specific operations and activities as outlined in this Plan. The University of Alabama at Birmingham will operate in an efficient and environmentally safe manner and will take reasonable measures to prevent oil spills from occurring. If an oil spill should occur, The University of Alabama at Birmingham will take reasonable actions to contain the spill and prevent the oil from reaching and discharging into or upon the navigable water of the United States or adjoining shorelines, as defined in Title 40 Code of Federal Regulations (CFR) Part 112. The signature contained herewith designates The University of Alabama at Birmingham's approval of this Spill Prevention Control and Countermeasure Plan prepared pursuant to 40 CFR Part 112 and indicates that this Plan will be implemented as herein described.

Name: Olen L. Pruitt
Title: Executive Director, Facilities Management

Signature:
Date:

Name: Max L. Richard
Title: Assistant Vice President for Occupational Health and Safety

Signature:
Date:
2.2 Certification (112.3(d))
I hereby certify that: (i) I am familiar with the requirements of 40 CFR Part 112, (ii) my agent has visited and examined the facility, (iii) the plan has been prepared in accordance with good engineering practices including the consideration of applicable industry standards, (iv) procedures for required inspections and testing have been established, (v) and the Plan is adequate for the facility.

Tad Goetcheus
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

(Professional Engineer Seal)

Date: 6/1/2010 Registration No.: 28036 State: AL

This Spill Prevention Control and Countermeasure (SPCC) Plan was generated by the University of Alabama at Birmingham and reviewed by HRP Associates, Inc. This SPCC plan has been certified by a Professional Engineer and an original copy has been retained by HRP Associates, Inc. Any changes or modifications made to this plan (other than non-technical amendments such as changes to phone numbers or names) by The University of Alabama at Birmingham which are not certified by a Professional Engineer negate the Professional Engineer certification and may lead to a violation of the applicable SPCC regulations.

Note: This certification is contingent on addressing the following items:
- Figures 1 and 2 only indicates elevators, no other fixed oil storage device are indicated as required;
- USTs which are regulated under 40 CFR 280 must be marked on the map as "exempt;"
- Table 1 should reflect recently acquired double-walled kitchen grease containers; and
- Implement Proposed Corrective Measures as listed in Section 13.

This certification shall in no way relieve University of Alabama at Birmingham of its duty to prepare and fully implement a SPCC Plan in accordance with 40 CFR 112.7, as required by 40 CFR 112.3(a), (b), and (c).
2.3 Coverage

The policies and procedures set forth in this Plan are applicable to all The University of Alabama at Birmingham personnel, faculty, staff and students who work near or with oil on campus. “Oil” means any kind, any form of oil to include heating oils, motor fuels, lubricating oils, cutting oils, quenching oils, hydraulic oils, transformer oils, mineral oils and cooking oils.

The departments that may be covered under this Plan are:
- Facilities Grounds and Services
- Automotive Services
- Central Utilities
- Food Services

Periodically, each department will review its use and storage of oil. Any “sensitive” areas of concern (i.e. a storm drain, etc.) where a release into the environment could occur will be noted.

2.4 Administration of Responsibility

To fully implement policies, the assistance and cooperation of all The University of Alabama at Birmingham faculty, staff and students are necessary. The following descriptions outline key roles and responsibilities involved in the implementation and maintenance of this Plan.

The Department of Occupational Health and Safety

The Department of Occupational Health and Safety (OH&S) reports to the Associate Vice President of Facilities at The University of Alabama at Birmingham. OH&S will oversee the SPCC Plan for the University and will conduct the following activities:

- Inspect facilities to ensure compliance with the provisions of the Plan;
- Investigate environmental releases;
- Coordinate training and maintain training records;
- Update the SPCC Plan as required;
- Remain current with regulatory and legal requirements;
- Assist departments with their inventories;
- Serve as Emergency Coordinator for The University of Alabama at Birmingham;
- Coordinate waste oil disposal on campus;
- Make emergency information for the UAB Community available for posting and sharing;
- Evaluate performance of this plan after a reportable incident and make appropriate revision of plan.

Additionally, the departments listed below will be responsible for the following actions:

Facilities Management

- Inform the OH&S Office of any environmental releases, provide recommendations concerning these incidents, and ensure that corrective action is taken;
- Provide updates, changes to the list of underground storage tanks (USTs), above ground storage tanks (ASTs), and oil storage (transformer oils, hydraulic oil, lubricating oils, mineral oils) and usage locations;
- Regular monthly inspections of ASTs and associated valves and piping;
- Monthly reconciliation of all USTs by means of a Veeder-Root monitoring system;
- Regular monthly inspections of USTs, sumps and associated piping;
- Storage of oil containers and drums in secondary containment, as needed;
• Ensure that all fill caps are in place and locked where needed;
• Maintain security of oil storage areas; and
• Maintain fire safety systems such as sprinkler and fire alarm systems.
• Ensure that spill prevention controls, such as secondary containment, as required, are part of all new UST and AST projects;
• Inform contractors on-site of their responsibilities in accordance with this Plan.

Other Applicable Departments:
• Inform the OH&S Office of any environmental releases, provide recommendations concerning these incidents, and ensure that corrective action is taken;
• Provide updates, changes to the list of USTs, ASTs, and oil storage and usage locations;
• Storage of oil containers and drums in secondary containment, as needed; and
• Maintain security of oil storage areas.

Supervisors
The immediate supervisor of each area is responsible for implementing the policies and procedures of the Plan. It is the responsibility of each supervisor to perform the following:
• Ensure that workers know and follow policies and practices;
• Ensure that workers have been properly trained and that training activities are
• Ensure that control measures selected for use are adequate and protective equipment is readily available;
• Follow recommendations made by the University to correct any unsafe conditions; and
• Maintain an inventory of oil used and stored by their respective department.

Employees
Employees of the University are expected to:
• Conform to good standard practices and procedures for the material they work with by reviewing current literature, available Material Safety Data Sheets and applicable UAB policies;
• Wear appropriate personal protective equipment;
• Use engineering controls and safety equipment properly;
• Participate in all required training programs;
• Report to the appropriate supervisor all facts pertaining to incidents resulting in releases of oil, and any action or condition that may cause an incident with oil;
• Follow emergency response notification procedures; and
• Learn, understand, and observe all policies and practices listed in this Plan.

Contractors
Contractors who work on campus are required to be briefed by UAB Facilities Project Management Services at the commencement of any large project, or periodically, as necessary.

Contractors are expected to:
• Observe UAB’s policies and procedures;
• Ensure that their personnel have appropriate training;
• Ensure fuel oil delivery trucks have automatic shutoff valves;
• Report damaged systems to Facilities Management personnel;
• During fuel delivery, use dry shutoff valves or have a pail to catch drippings;
• Ensure adequate capacity in tank prior to oil delivery;
- Ensure that fill caps are locked when finishing filling operations; and
- In the event of a spill, notify the Department of Occupational Health and Safety, 205-934-2487, or after hours, OH&S Emergency Response at 205-934-3411.

2.5 Inspections and Nonconformance (112.7)(e)) and 112.8(c)(6)

All tanks, associated piping and container storage areas will be inspected monthly by applicable personnel to ensure container integrity and proper management. The integrity testing will be conducted according to industry standards and will be based on the size of the tank, the age, visual inspection and at least one other non destructive shell testing. The inspection will document all actions taken on the system including product removal from containment or diked areas. A copy of the inspection form is included in Appendix V

Periodic inspections will also be performed by the Department of Occupational Health and Safety. These will consist of formal reviews of each department’s conformance with policies and procedures stated in this document. Inspections may be unannounced; however, the Department of OH&S will attempt to include representative department members during inspections of their work areas. All departments will also perform periodic self-reviews to ensure compliance with this Plan. Inspection forms and logs will be maintained for 3 years.

The Office of OH&S shall forward a copy of the completed Inspection Checklist sent to each supervisor-in-charge. Upon receipt, the supervisor will address any issues, sign-off on the checklist and send a copy back to the Office of OH&S. All checklists and documented corrective actions will be filed with the department and in the Office of OH&S. If it is determined that there are issues of non-conformance with the Plan, corrective action should be taken immediately by the department. Departments are expected to make necessary corrections as soon as possible after notification. A signed copy of the nonconformance notification and the actions taken must be returned to OH&S within 30 days of receipt. The Office of OH&S will then follow up as necessary.

If the same non-compliance issue is noted in a department after a second inspection, and is considered to be significant in the professional judgment of OH&S staff or designee, the head of the department will also be notified in writing within 30 days after the second inspection. If, after three inspections the same significant issue exists, a report will be sent to the appropriate Vice President within 30 days of the most recent inspection. In cases of imminent and substantial danger to life, health or the environment, the Assistant VP for OH&S or designee is authorized to order the cessation of hazardous activity until the danger from such a condition is abated or adequate protective measures have been taken.

2.6 Record-keeping Requirements (112.7(e))

Inspections of the tank and container storage and dispensing areas not visible or accessible by UAB employees during normal department operations will be conducted on a monthly basis and whenever tanks are filled. Written inspection logs are maintained in the Facilities Department at The University of Alabama at Birmingham and/or on the tanks themselves. Inspections forms and logs will be maintained for 3 years. In addition, spill incidents will be documented and maintained on file in the OH&S Office. Additional records that are maintained include the following:
- Annual Contracts with the Oil Delivery Contractors are maintained on file in the Purchasing Office;
• Leak test results, cathodic protection tests, and monthly monitoring reports are maintained on file in the Facilities Department; and
• Daily reconciliation and Veeder-Root system readouts are maintained on the system themselves or in the Facilities Department as part of the monthly monitoring report.

Documents to be maintained in the Office of OH&S applicable to this program include:
• SPCC Plan;
• Training records;
• Records of non-conformance and corrective action;
• Applicable regulations;
• Incident reports; and
• Safety equipment inspection reports.

Records to be maintained in applicable department offices include:
• Lists (with locations) of oil used by the department;
• SPCC Plan;
• Inspection reports and corrective actions taken; and

Records will be kept in accordance with legal requirements, as they apply.

2.7 Plan Location

Copies of this Plan are at the following locations:

• Facilities Management
• The Office of Occupational Health and Safety; and
• Made available to all applicable fire safety, police, OH&S and facilities personnel.

Regulations specify that a copy of the Plan be maintained at the facility. It will also be made available during normal business hours for EPA or ADEM review.

2.8 Plan Review & Changes (112.5)

The Plan must be certified by a registered professional engineer and reviewed at least once every five years. Amendments to the Plan will take place when any of the following occurs:
• Changes in facility design, construction, operation or maintenance that affect the potential for oil discharge;
• After having two or more oil spills that exceed reportable quantities in a 12 month period; or
• A spill involving 1,000 gallons or more.
3.0 FACILITY DESCRIPTION (112.7 (b)) and 112.7 (f)(2))

Facility Name: The University of Alabama at Birmingham
Facility Address: 701 20\textsuperscript{th} Street South
Birmingham, Alabama 35294
Facility Type: University and Medical Research Center, Hospital and Clinics, SIC Codes #8221, #8062, #8011
Total Student Enrollment: Approximately 18,000
Faculty, Staff: Approximately 17,000
Total Acres: 270
Total Buildings: 220

Contact/Person in Charge: Max L Richard, Assistant Vice President for Occupational Health and Safety
Business Telephone: 205-934-7414

Cellular Telephone: 205-306-9801
Normal Hours of Operation: 8 AM to 5 PM, Monday through Friday

Facility Site Plan: See Figure 1

3.1 Flood Drainage

The facility and the tank systems do not lie within the 100-year floodplain.
A site plan is provided in Figure 1 at the end of this Plan. Tables 1-4 show oil storage tanks, transformers and drum locations around The University of Alabama at Birmingham campus.

### 4.1 The University of Alabama at Birmingham's USTs and ASTs (112.8 (c)(2))

Tables 1 through 5 present a summary of each of the petroleum storage tanks present at The University of Alabama at Birmingham (the main campus). The tables include the following information: the building location of the tank, the type/make of the tank, the tank storage capacity, the petroleum product contained in the tank, and any tank specific spill prevention controls.

### 4.2 Transformers

Transformer oils, associated with approximately 30 transformers, are located throughout the main campus. The quantity of oil in the transformers ranges from 80 to 1500 gallons. A complete list is provided as Table 3.

### 4.3 Used Oil

Used oils are generated by our Facilities Department and are stored in 55 gallon drums. They may be found in various locations within the maintenance operations or at our Hazardous Materials Facility. Used oils are stored with a suitable form of secondary containment unless considered mobile.

### 4.4 Miscellaneous Oil Storage

Virgin oils used in general facility operations are stored in tank, drums and small containers of various sizes throughout the facility. Hydraulic oil is also used for the operation and control of elevators located at The University of Alabama at Birmingham (Table 5). Lubricating oils are located in Automotive Services and several mechanical rooms for maintaining and servicing equipment. Vegetable oils are located in various dining halls for use in cooking food.

### 4.5 Emergency Generators

A number of emergency generators are located around the campus. A complete listing of the ASTs (Day Tanks) associated with the generators is provided in Table 1.

### 5.0 SPILL ESTIMATES AND PATHWAYS (112.7(b))

Figure 1 shows a schematic of The University of Alabama at Birmingham main campus. This section describes the potential quantities of oil released under assumed worst-case scenarios that do not necessarily reflect the probable occurrence of such events. These events are considered representative of all the potential spill incidences that could occur on the campus, and comparable procedures would be followed in the event of a spill at one of the locations that is not specifically discussed below.

#### 5.1 Tank Filling Operations
A catastrophic release of up to 10,000 gallons of diesel or No. 2 fuel oil could occur during oil delivery procedures, where ASTs and USTs are filled via exterior fill ports. Oil delivery vehicles generally park adjacent to the building in or near where the tank is located. The fill ports to some of the tanks on campus are situated in proximity to one or more storm water catch basins. In the event that an oil spill reached a catch basin, the oil would travel through the storm water sewer system and discharge into Valley Creek, which eventually flows into the Warrior River.

5.2 Tank Failure

There are a number of ASTs (some of which are associated with emergency generators) located around The University of Alabama at Birmingham campus, and are situated both inside and outside the buildings. Catastrophic failure at any of the ASTs could result in an oil spill of up to 600 gallons of diesel or No. 2 fuel oil. Some of the ASTs are located in proximity to floor drains or storm water catch basins. The spilled oil would travel through the storm water sewer system and discharge into Valley Creek, which eventually flows into the Warrior River.

5.3 Fuel Dispensing Operations

The University of Alabama at Birmingham campus has a fuel dispensing operation located at the Chevron Building (Remote Parking) adjacent to the Automotive Services Shop. While there is a potential for an oil spill during fuel pumping/dispensing activities, someone needs to be present in order to pump the fuel, and it is assumed that the maximum amount that could be released is less than 100 gallons. The tank filling operation would be the worst case scenario since each tank holds 10,000 gallons. Storm water catch basins are located in proximity to the dispensing facilities. In the event that an oil spill reached a catch basin, the oil would travel through the storm water sewer system and discharge into Valley Creek, which eventually flows into the Warrior River.

5.4 Transformers

There are approximately 30 transformers of various sizes located at The University of Alabama at Birmingham campus. These transformers contain between 80 and 1500 gallons of oil. All the transformers are placed on concrete pads, and most of them are located in landscaped areas that are sufficient to hold/contain any oil that could be spilled. However, some of the transformers are located in areas where surface drainage could allow spilled oil to flow into catch basins, then the storm water sewer system, and eventually the Warrior River.

5.5 Used Oil

Used oils are generated and stored in drums in various locations before being sent to the Hazardous Materials Facility. Some of these locations have floor drains in the vicinity of the oil storage area. The maximum quantity of oil that could be spilled in any one location is about 220 gallons (4, 55 gallon drums). In the event of a release, the oil could pass through the storm water system into surface waters.
5.6 Miscellaneous Oil Storage

Catastrophic spillage from the drums and containers stored indoors throughout the UAB campus could result in a spill of hydraulic, vegetable, lubricating, or mineral oil. The maximum quantity stored in any one location is about 220 gallons (4, 55 gallon drums). Some of the rooms containing oil have floor drains. In the event of a release of oil in the vicinity of floor drains, the oil could pass through the storm water system into surface waters.

6.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURES (112.7(a)(3)(ii)

This section presents physical systems, procedures, and measures for prevention, control, and response to spills of oil based on the potential cause of the release. The items which require activities by the oil delivery company are included in all new contracts that outline oil delivery procedures. Except where noted, USTs and ASTs located at The University of Alabama at Birmingham campus have, at a minimum, the following spill prevention controls (Note: See the Section 13 for a discussion on ASTs that do not currently have adequate secondary containment and a description of proposed corrective measures):

6.1 Minimum AST Spill Prevention Controls

- Isolation valves
- Secondary containment, when necessary (many ASTs are located in sealed basements and are associated with generator UST)
- Regular inspections of ASTs and associated piping
- Spill kits, diking material and/or storm drain covers

6.2 Minimum UST Spill Prevention Controls

- Overfill/spill bucket on the fill line
- Automatic shut off devices with high level alarms
- Monthly monitoring and inspections on all tanks and associated piping
- Veeder-Root leak detection systems with double wall piping
- Spill kits, diking material and/or storm drain covers

6.3 Overfills & Oil Transfer Operations (112.7(h)(1), (2), & (3) and 112.8(c)(8) and 112.12(c)(8))

Standard procedure requires that a UAB employee be present during fuel oil delivery at all times. Trucks are to have automatic shutoff valves to prevent overfills and wheel chocks to prevent delivery vehicles from departing before complete disconnection of transfer lines. All suppliers must meet the minimum requirements and regulations for tank truck loading/unloading established by the U.S. Department of Transportation.

Standard procedure requires routine inspections of ASTs, filling and dispensing areas and container storage areas, and their examination for evidence of spillage, staining, corrosion, damaged equipment, or damaged containers. Damaged systems will be repaired or replaced promptly and integrity testing will be performed prior to bringing system back in service. Inspection logs are maintained for individual tanks and/or piping locations (for ASTs only).
During fuel deliveries, the delivery operator must use dry shutoff valves or have a pail to catch drippage. Storm drain covers and/or spill booms are available to cover storm drains if needed.

A communication system (i.e., telephone, radio, walkie-talkie, or cellular phone) will be available near the storage locations during transfer operations. If fuel delivery trucks are equipped with a communication system, that will be considered adequate means for emergency communication.

Liquid level inventory for each tank will be checked with a tank gauge or electronic probe prior to tank filling to ensure there is adequate capacity in the tank for the oil delivery.

6.4 Diesel and Gasoline Dispensing

Pump locks
Dispensing containment pads

6.5 Piping Failure

Piping for the AST systems are monitored visually for leaks and have been securely mounted to prevent corrosion. Piping for the UST systems are inspected by UAB personnel visually and via routine tightness testing. Piping on UST systems is corrosion resistant, double walled and have leak detection systems for monitoring leaks

6.6 Primary Tank Failure

Most ASTs have secondary containment surrounding the tanks to contain fuel oil in the event of a tank failure. Unless otherwise indicated in Section 13, those that do not have this protection are located where a catastrophic failure will not result in a release to the waters of the state or a storm drain. These tanks are in sealed basement areas with floor drain covers thus secondary containment is provided by the building. USTs have Veeder Root monitoring systems on double walled tanks and supply fuel to day tanks.

6.7 Accidental Drum/Container Spill  (112.8(c)(3) and 112.12(c)(3))

The buildings containing various oil containers are locked during off-hours. Containers and drums used to store oil are not stored outside or in areas proximate to storm drains. Spill basins are also used where possible.

Containers stored in containment dikes or catchment basins will be checked and emptied when necessary by way of drainage valves or pumps. The contents will be disposed of properly. Any containment dikes or catchment basins that collect rainwater will be checked for a sheen prior to discharge or disposal. A notation in the inspection log will be made when removal of any product is made.

6.8 Emergency Equipment

Emergency Equipment - General

The facility maintains a list of all emergency equipment needed for spill contingencies at the campus. A list of such equipment, including a physical description, location, and outline of their capabilities, is presented in this section.
Fire Control Equipment

Many of the buildings on the UAB campus are equipped with complete automatic sprinkler systems. Firefighting equipment is available at UAB for use in emergencies related to chemical use and hazardous waste. ABC Fire Extinguishers are located in all laboratories. Additional fire extinguishers are located throughout the campus in all the buildings. Fire hydrants are located strategically throughout the campus. Most buildings are equipped with an automatic fire alarm system. The typical response time of the fire department to the campus is routinely less than 5 minutes.

Spill Control Equipment

Spill control equipment is available in the following areas:
- Waste Holding Facility
- Laboratories
- Maintenance Areas
- Grounds and Services

Posted Emergency Information Listings

Emergency information is posted at the locations stated above. This information is also available on the OH&S website (www.healthsafe.uab.edu).

Personal Protective Equipment

The following Personal Protective Equipment is maintained at The University of Alabama at Birmingham for use by personnel during an emergency involving the release of hazardous materials: Emergency eye wash and quick drench shower stations are located in near the hazardous waste storage rooms. Eye wash stations and safety showers are also available in all research and teaching laboratories where hazardous materials are used and hazardous wastes are generated. Gloves and eyewear are contained in spill kits.

Equipment Testing and Maintenance

The emergency coordinator or his/her designee will coordinate the periodic inspection of all communication and fire control equipment. He/she will ensure that spill control and personal protective equipment are readily accessible and in good working order. Fire extinguishers will be serviced annually and routinely inspected to assure they are fully charged and ready for use.

7.0 SPILL/RELEASE RESPONSE & REPORTING PROCEDURES

This section outlines the response and reporting procedures to be undertaken in the event of an oil spill.

7.1 Immediately Contact Emergency Coordinator or Alternate Emergency Coordinator

At all times, there will be one person, either on-campus or on call (within 1 hour driving distance to facility), who will be responsible for coordinating all emergency response measures. This individual will be designated the Emergency Coordinator, and will have the authority to mobilize
all resources necessary to carry out procedures outlined in this Plan. The Emergency Coordinator and the Alternate(s) are thoroughly familiar with this plan, the activities at the campus, the location of storage tanks, the location of records, the campus layout, and location of all emergency response and spill cleanup and control equipment.

In the event of an oil spill at the campus, contact the Emergency Coordinator immediately (see Appendix).

7.2 Emergency Coordinator Assumes Control

The Emergency Coordinator will be informed of the nature and location of the spill and will direct the resources of manpower and equipment for the spill response action. The Emergency Coordinator will remain in control for the duration of the response.

7.3 Summons of Outside Support

The Emergency Coordinator, or individual directed by the Emergency Coordinator, will make the necessary contact with outside services and regulatory agencies. In the event of a larger spill, a commercial hazardous waste vendor will be called to provide professional services for the removal and disposal of contaminated material (refer to Appendix I).

In the event of a tank rupture, the tank will be repaired or replaced per the direction of the local fire department.

7.4 Regulatory Agencies

A spill of GREATER THAN 25 GALLONS OF OIL (the reportable quantity) or a SPILL OF ANY QUANTITY THAT HAS REACHED a surface water, or into a sewer, ditch, or culvert leading thereto, is immediately reportable, by law, to one or more municipal, state, or federal authorities. The SPCC Coordinator is responsible for immediate notification of reportable spills to the appropriate authorities and agencies. In addition to the initial telephone contact, a written spill report is also required for the Alabama Department of Environmental Management. Emergency phone numbers listed in this plan will be on file at the UAB Police dispatch and in the offices of the SPCC Coordinator and Alternates.

The following information should be provided when contacting the agencies listed in Appendix I in the order specified below:
1. Identity of the caller;
2. Contact phone number;
3. Location of spill;
4. Type of product spilled;
5. Quantity spilled;
6. Extent of actual and/or potential water pollution;
7. Date and time of spill; and
8. Cause of spill.

7.5 Emergency Coordinator's Responsibility (See Appendix II)

The Emergency Coordinator will assess possible hazards to human health and/or the environment that may result from a spill/release on The University of Alabama at Birmingham campus. The Emergency Coordinator must consider both direct and indirect (primary and secondary) effects of a spill/release. He/she must also decide whether an emergency situation
exists with such an episode. In the event of an emergency, the Emergency Coordinator will assume the following responsibilities:

**Immediate Identification and Assessment**

The Emergency Coordinator or alternate will immediately identify the nature of the emergency, noting the exact source, type, quantity and the extent of the spill.

**Immediate Action**

The Emergency Coordinator will perform the following immediate actions:

- Activate internal facility communication system, where applicable, to notify all building occupants.
- Notify UAB Police who will notify the Birmingham Fire Department as appropriate.
- Notify appropriate emergency teams, if needed.
- Designate individual to meet the responding fire, police or ambulance service at the appropriate staging area for that building.
- Notify the local safety officials, the Alabama Department of Environmental Management (ADEM), and the U.S. Environmental Protection Agency (EPA), as appropriate, if the emergency coordinator determines that there is an imminent or actual emergency which can threaten the public health, safety, welfare, or the environment.

**Assessment of Release Off-Campus**

If the emergency can threaten human health and/or the environment off-campus, the Emergency Coordinator will:

- Notify UAB Police who will contact necessary local authorities (e.g. Fire Department, Police Department) (See Appendix I - External Contact List).
- Be available to assist local authorities in making the decision to evacuate the local area.

**During an Emergency**

The Emergency Coordinator will take measures to minimize the risk for fires, explosions, or releases or contain these risks from spreading to other oil storage areas at the campus, by ensuring that the appropriate emergency response personnel are notified and clean up is initiated.

**Post Emergency Activities**

After an emergency, the Emergency Coordinator will:

- Supervise cleanup efforts, and ensure that the recovered oil and contaminated materials are properly stored and disposed of.
- Ensure that all emergency equipment is cleaned and ready for future use.
- Ensure that no waste that is incompatible with the released material is stored or disposed of in the affected area until cleanup procedures are completed.
- Notify local authorities and the Alabama Department of Environmental Management (ADEM) that cleanup has been completed and emergency equipment has been restored, before resumption of activities in the affected areas.
- Record the time, date, and details of the incident.
Notification Requirements

The following are minimal procedures for notifying ADEM of releases or threats of release of oil which must be reported.

Release requiring notification to ADEM:
“Owners and operators of UST systems must report suspected releases to the Department immediately upon discovery but in no case later than 24 hours following discovery, and follow the procedures in rule 335-6-15-.22.

“Owners and operators of UST systems must contain and immediately clean up a spill or overfill and report to the Department within 24 hours, or another reasonable time period specified by the Department, and begin corrective action in accordance with rules 335-6-15-.24 through 335-6-15-.31 in the following cases:
(a) Spill or overfill of petroleum that results in a release to the environment that exceeds 25 gallons or another reasonable amount specified by the Department, or that causes a sheen on nearby surface water; and
(b) Spill or overfill of a hazardous substance that results in a release to the environment that equals or exceeds its reportable quantity under CERCLA (40 CFR 302).”

Notification to ADEM will be made as soon as possible but not more than 24 hours after obtaining knowledge of a release or threat of release (for contact information see Appendix I). Notification to ADEM will consist of the following information to the extent known:
- Name and telephone number of caller,
- Location of release/threat of release,
- Date and time of incident,
- Identity of oil or hazardous material involved,
- Approximate quantity,
- Source of release/threat of release,
- Brief description of incident,
- Name and phone number of owner or operator,
- Name and phone number of contact person,
- Measures taken or proposed, and
- Any information on potential environmental impacts.

Resumption of Operation

Prior to resuming normal operations, the Emergency Coordinator will ensure that all safety and emergency equipment is inspected and returned to operable conditions. The Emergency Coordinator will notify the Alabama Department of Environmental Management and appropriate local authorities that the above have been done before resuming operation.

Following clean-up operations, an assessment will be made as to the proper handling of recovered oil.

Specific Response Scenarios for Releases

The Emergency Coordinator or her/his alternate will be responsible for the proper implementation of the emergency procedures. Emergency procedures for specific types of emergencies are addressed in this section.
Medical Emergencies

A variety of personal protective equipment and emergency equipment will be maintained on site. In addition, at all times there are trained first responders available at the UAB Police Station, and trained doctors and nurses at the UAB Hospital Emergency Department.

Dialing the in-campus emergency extension “4-3535” (Campus Police), will summon a trained UAB first responder to the scene. The following are general emergency response procedures:

- Call the UAB Police emergency extension “934-3535” (Campus Police).
- Give details of the incident; if necessary, UAB Police will notify the appropriate emergency response services (i.e. Ambulance, Hospital, etc. – See Appendix I for listing of External Emergency Response Services and Contact Information);
- While awaiting the arrival of an external emergency response unit, obtain Material Safety Data Sheets (MSDSs) of the chemical involved. MSDSs can be obtained by calling 1-800-451-8346 (3E Company) and requesting a fax copy or by calling OH&S at 934-2487. The description of the incident and the Material Safety Data Sheet (MSDS) should be sent, and/or faxed to the hospital with the victim.

Spill Events

In the event of an incident involving a large spill (greater than 1 gallon of hazardous material or 1 pint of acutely hazardous material) alert the UAB spill response team at 934-2487 or Campus Police at 4-3535. Campus Police will immediately notify the Emergency Coordinator or her/his Alternate. The Campus Police or the Emergency Coordinator will summon additional assistance, if necessary (local or state emergency response teams, fire depts., etc); Trained responders will use appropriate personal protective equipment (PPE). Determine exact source of leak or spill, amount, and area affected by the release; Dike spill material with standard industrial absorbent. Take the necessary action to keep the spill from spreading. Spread absorbent to surround and absorb the spilled material; Collect contaminated material (absorbent, rags, disposal suits, etc.) into a recovery drum and label for proper disposal; clean, restore, and replace PPE and spill response equipment; and follow all notification and recordkeeping requirements specified above in section entitled ‘Notification Requirements’ (under Section 7.5).

Releases to Surface and Groundwater

Releases to surface or groundwater from The University of Alabama at Birmingham are unlikely because oil is stored in containment areas, or inside buildings. These measures would prevent any spill from reaching surface or groundwater, or the environment. If a situation arises where the surface or groundwater, or the environment, is threatened, the Emergency Coordinator at The University of Alabama at Birmingham will call the emergency contractor (Spill Contractor listed in Appendix I - External Emergency Response Services and Contact Information). If a release threatens a surface water body by entering storm drains, the Emergency Coordinator at The University of Alabama at Birmingham will initiate appropriate containment controls, until the material can be absorbed or until arrival of a spill contractor. Contaminated areas will be decontaminated and cleaned as appropriate. The Alabama Department of Environmental Management and the National Response Center will be notified immediately (see Appendix I) following any release or threat of release that requires such notification in accordance with 40 CFR 110 and 40 CFR 112.
The University of Alabama at Birmingham will comply with the requirements ADEM Administrative Code 335-6-15-.20 and 335-6-.23 in the event of a release or threat of a release to the environment.

8.0 DISPOSAL OF SPILL MATERIALS

Oil spills are cleaned up using spill absorbent material, and oil contaminated debris is drummed for off-site disposal. An outside contractor, (listed in Appendix I), is responsible for off-site disposal in accordance with applicable regulations.

9.0 PAST SPILL EVENTS (112.7(a))

In compliance with 40CFR 112.7a, Appendix III provides a brief description of each spill event this facility has experienced since the establishment of this spill prevention plan. The corrective action and plans for preventing recurrence are included for each incident.

10.0 TRAINING PROGRAMS 112.7(f)(1)

All oil-handling personnel are trained annually in the function and components of the SPCC plan. They are also instructed in the proper operation and maintenance of equipment to prevent the discharge of oil.

All personnel responding to an emergency are trained according to the level of response expected from that employee. Depending on the response level, the training includes the following:

- Spill prevention and notification procedures;
- Spill cleanup procedures;
- Oil handling procedures; and
- Internal facility communication/alarm systems.

Appropriate UAB personnel have been provided with the annual HAZWOPER and First Responder Awareness training.

Annual briefings are also conducted to assure adequate understanding of the SPCC Plan. Briefing will highlight and describe any spill events or equipment failures that may have occurred in the previous year. Briefing will also include any new precautionary measures or changes in response actions. (112.7)(f)(3)

All SPCC training records are documented and maintained in OH&S.

11.0 SECURITY (112.7(g)(1), (2), & (3))

All oil storage containers, valves, starter controls, etc. are either located in a locked building, behind a locked fence or contain a locked cage that cannot be accessed by unauthorized personnel. UAB is an urban university medical center and maintains maximum lighting in all areas of the campus. The UAB Police patrols the campus 24 hours a day.
12. AMENDMENTS, CHANGES, REVIEWS AND COPIES OF PLAN/AGREEMENTS

12.1 Plan Review (112.5)

This SPCC portion of this Plan was originally prepared in 2009, and will be updated or revised at least every 5 years. A professional engineer will recertify for any technical amendments in accordance with 112.3(d).

The Plan will be reviewed and, if necessary, immediately updated whenever any of the following take place:

- The Plan fails in an emergency;
- The list of emergency coordinators changes;
- The list of emergency equipment changes;
- There is any change in the operation or maintenance of the facility; or
- There occurs any other circumstance, which indicates the need for a change in the Plan.

Revision dates are as follows:

<table>
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<tr>
<th>Date</th>
<th>Reviewed &amp; Amended By (Name)*</th>
<th>Recertification by PE</th>
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*I have completed review and evaluation of the SPCC Plan for UAB on (date) and will (will not) amend the plan as a result.

13.0 PROPOSED CORRECTIVE MEASURES

The following day tanks associated with hospital emergency generators were identified as needing to be upgraded to meet existing regulations. The primary USTs supplying these tanks were upgraded in 1998. Boshell Diabetes Building - 2 single wall day tanks, West Pavilion – 2 single wall day tanks, Russell Wing - 1 single wall day tank, and Quarterback Tower (Powerhouse) – 2 single wall day tanks.

These tanks are in basements where floor drains can be closed and leaks minimized until the upgrades can be done. All associated piping for ASTs will be evaluated and updated as needed to meet current regulations on corrosion and leak detection. Estimated time to completion is approximately two years.

The Ulman Building tank is a 10,000 gallon boiler tank that supplies diesel for heating the boiler. This tank is currently part of our natural gas curtailment plan. We will investigate either permanently closing the tank or upgrade it to meet current SPCC regulations. Estimated time to completion is approximately 2 years.
LIST OF TABLES, APPENDICES AND FIGURES

TABLE 1 – ABOVEGROUND STORAGE TANK INVENTORY
TABLE 2 – UNDERGROUND STORAGE TANK INVENTORY
TABLE 3 – TRANSFORMER INVENTORY
TABLE 4 - DRUM INVENTORY
TABLE 5 – HYDRAULIC ELEVATOR INVENTORY
APPENDIX I – EXTERNAL EMERGENCY CONTACTS AND RESPONSE SERVICES
APPENDIX II – NOTIFICATION LIST
APPENDIX III – PAST SPILL EVENTS
APPENDIX IV - CERTIFICATION FOR FACILITIES THAT DO NOT POSE SUBSTANTIAL HARM
APPENDIX V – INSPECTION FORMS (AST & UST)
FIGURE 1 – UAB CAMPUS MAP FACILITY SITE PLAN
FIGURE 2 – UAB CAMPUS MAP HYDRAULIC ELEVATORS LOCATIONS
<table>
<thead>
<tr>
<th>Tank Number</th>
<th>Building/Location</th>
<th>Address</th>
<th>Type of Tank</th>
<th>Capacity/Tank</th>
<th>Number of Tanks</th>
<th>Total Capacity (gal)</th>
<th>Product</th>
<th>Spill Control</th>
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<td>JT Dining located behind JT/Kracke Bldg</td>
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<td>Ullman Building,</td>
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<td>Building/Location</td>
<td>Address</td>
<td>Type of Tank</td>
<td>Capacity/ Tank</td>
<td>Number of Tanks</td>
<td>Total Capacity (gal)</td>
<td>Product</td>
<td>Spill Control</td>
</tr>
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<td>Type of Tank</td>
<td>Capacity/Tank</td>
<td>Number of Tanks</td>
<td>Total Capacity (gal)</td>
<td>Product</td>
<td>Spill Control</td>
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<td>Cudworth</td>
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<td>0</td>
<td>Trans. Oil</td>
<td>Sorbent Material</td>
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<td>Drain Covers</td>
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**TABLE 4 – 55 GALLON DRUM INVENTORY** *  

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<tr>
<th>Tank Number</th>
<th>Building/Location</th>
<th>Address</th>
<th>Type of Tank</th>
<th>Capacity/ Tank</th>
<th>Number of Tanks</th>
<th>Total Capacity (gal)</th>
<th>Product</th>
<th>Spill Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>90</td>
<td>VH-B004A (Volker Hall)</td>
<td>1670 Univ. Boulevard</td>
<td>Drum</td>
<td>55</td>
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<td>Elevator hydraulic oil</td>
<td>Sorbent Material Drain Covers</td>
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<td>Drum</td>
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<td>55</td>
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<td>1430 Warehouse</td>
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<td>Drum</td>
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<td>Paint</td>
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<tr>
<td>90</td>
<td>Waste Holding Facility</td>
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<td>Drums</td>
<td></td>
<td></td>
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<td>Waste Oil</td>
<td>Sorbents, Secondary Containment</td>
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* Number of drums and total capacity stored will vary in areas
<table>
<thead>
<tr>
<th>Tank Number</th>
<th>Building/Location</th>
<th>Address</th>
<th>Capacity/ Tank</th>
<th>Number of Tanks</th>
<th>Total Capacity (gal)</th>
<th>Product</th>
<th>Spill Control</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Alys Performing Art Center</td>
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<td>150</td>
<td>1</td>
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<td>Sorbent Material Drain Covers</td>
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<tr>
<td>Bevill Biomed</td>
<td>845 19th St. S.</td>
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<td>100</td>
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<td>Number of Tanks</td>
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<td>Total Capacity (gal)</td>
<td>Product</td>
<td>Spill Control</td>
</tr>
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APPENDIX I – EXTERNAL EMERGENCY CONTACTS AND RESPONSE NUMBERS

External Emergency Contacts

Alabama Department of Environmental Management (ADEM) (205) 942-6168
Birmingham, Al

National Response Center (NRC) 1-800-424-8802

Birmingham Fire Department (205) 251-1291

Oil Spill Response Contacts

HEPACO, Inc. (205) 957-2207
Birmingham, AL 35210

Spectrum Environmental Services Inc (205) 664-2000
Pelham, AL 35124

SWS Environmental First Response (205) 833-3407
Birmingham, AL 35210

Alabama Oil and Gas Recovery (205) 467-2966
Trussville, Al 35173

Environmental Engineering

Bhate Environmental (205) 918-4000
Birmingham, Alabama

Hazclean Environmental Consultants (205)870-1982
Birmingham, Alabama

BECC (205) 941-1119
Birmingham, Alabama 35211
APPENDIX II – NOTIFICATION LIST

Internal Emergency Coordinator

UAB Police Emergency
934-3535

Occupational Health and Safety   934-2487 (Business hours)
After hours Director on Call pager #8744
Cell phone 288-6742

Additional Phone numbers are in the Director on Call Manual
APPENDIX III – PAST SPILL EVENTS
APPENDIX IV – CERTIFICATION FOR FACILITIES THAT DO NOT POSE SUBSTANTIAL HARM

Facility Name:  University of Alabama at Birmingham
Facility Address:  701 20th Street South, Birmingham, Alabama 35294

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   Yes ___      No _X_

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   Yes ___      No _X_

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C–III to this appendix or a comparable formula1 ) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's “Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments” (see Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.
   Yes ___      No _X_

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 Attachment C–III to this appendix or a comparable formula1 ) such that a discharge from the facility would shut down a public drinking water intake2 ?
   ______________

   1 If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

   2 For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).
   Yes ___      No _X_

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 discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
   Yes ___      No _X_

Certification

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

[Signature]

Max L. Richard
Name (please type or print)

Assistant VP for Occupational Health and Safety
Title

1/12/2010
Date
**APPENDIX V- INSPECTION FORMS**

**UAB SPCC Monthly Inspection Form**  
(Oil storage 55 gallons or greater)

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<th>Owner: University of Alabama at Birmingham</th>
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<td>Location/Room</td>
<td>Address:</td>
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<tr>
<td>Address</td>
<td>City, State, Zip Code: Birmingham, AL 35294</td>
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<td>City, County, Zip Code</td>
<td>Phone Number:</td>
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**Tank System Information**

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<td>(gallons):</td>
<td>Piping Material, circle one: (Steel) (Plastic) (Fiberglass)</td>
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<td>Tank Material, circle one:</td>
<td>(Steel) (Fiberglass)</td>
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| 2° Containment, circle one: | (Basin) (Double Wall) |
| (Absorbent) | (Berm) (Other) |

| Drone within 10 feet: | Y N |
| Drain Cover: | Y N |

1. Check tank gauge or monitor if applicable.
2. Check the following.
   - Evidence of leakage
   - Foundation for corrosion and cracks
   - Structural supports for corrosion and cracks
   - Tank walls and containment for cracks or leaks
   - Pipelines, plumbing, and valves for corrosion, cracks, and leaks
3. Submit a copy of this document to your supervisor as record of monthly inspection

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## ADEM
### UST MONITORING LOG SHEET
#### MONTHLY LOG FOR YEAR ______

Questions on how to complete this form should be directed to Chemical Safety 934-2487

### Owner Information
- **Facility Name:**
- **Owner:**
- **Address:**
- **City, County, Zip Code:**
- **City, State, Zip Code:**
- **Facility I.D. Number:**
- **Phone Number:**

### Tank System Information
- **Tank Size:**
- **Type of Product in Tank:**
- **Monitor Type:**
- **Double Wall Piping, circle one: (Yes) (No)**
- **Tank Material, circle one: (Steel) (Fiberglass)**
- **Piping Material, circle one: (Steel) (Plastic) (Fiberglass)**

#### MONITORING LOG
- **For Sumps or Manholes (if applicable): Designate "P" for product, "W" for water, "P" and "W" for both, and "D" for dry.**
- **If "P" or "W" or both are indicated, include depth in each in inches.**

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<thead>
<tr>
<th>Month</th>
<th>Date Monitored</th>
<th>Monitor’s Initials</th>
<th>Spooling Properly</th>
<th>Alarm Lights</th>
<th>Sumps or Manholes</th>
<th>Monthly Leak Test Run</th>
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<td></td>
<td></td>
<td>Y/N</td>
<td>If Yes explain action taken</td>
<td>W, P, D explain</td>
<td>Y/N if N, explain action taken</td>
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### Date of any Repairs or Tightness Tests

### Description of any Repairs or Tightness Tests

### Comments

(Include information on liquid removal and disposal from sumps/manholes, alarm lights, if applicable.)

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Figure 1

UAB CAMPUS MAP

Surface Flow Direction - A major uncontrolled spill would flow to the nearest street storm sewer and be conveyed to Village Creek near Legion Field

Refer to respective Tank numbers in Tables 1 - 4 for specific volume and content information

- Containers
- Above Ground Storage Tanks
- Underground Storage Tanks
- Transformers