

**UMM: SPCC Plan Implementation****Talking Points**

Rev. 4/2016

This document provides talking points for managers in discussions to implement Spill Prevention, Control and Countermeasures (SPCC) Plans at University facilities that are subject to the regulation. These talking points are a summary of how the regulations apply to the facility, but is not comprehensive or detailed.

Item	
1	<p>SPCC Overview</p> <ul style="list-style-type: none">• The main focus of the Spill Prevention, Control and Countermeasures program is oil pollution control.• Facilities with more 1,320 gals of above-ground or 42,000 gallons below-ground Storage capacity are included.• UMM has approximately 39,500 gallons total capacity covered by SPCC (see table 1 in Plan for detail and breakdown by operational area)• Regulated containers include oil containers with a shell capacity 55 gallons and larger. Oil can be petroleum, mineral, and animal in origin.• Facility develops an SPCC Plan to identify regulated containers and activities, how to manage to prevent spills, inspection protocol, training, and how to respond to spills.
2	<p>What does SPCC cover?</p> <p>Regulated containers/activities at UMM include:</p> <p><u>Transportation Garage</u></p> <ul style="list-style-type: none">○ Aboveground storage tanks (5 tanks)○ Drum storage areas for 55 gallon drum (1 area)○ Underground storage tanks for fueling station (2 tanks) <p><u>Heating Plant</u></p> <ul style="list-style-type: none">○ Fuel oil tank (1 tank)○ Hydraulic reservoirs (2) assoc with biomass plant <p><u>Dining Services</u></p> <ul style="list-style-type: none">○ Used grease (1) <p><u>Oil-filled Equipment (OFE)</u></p> <ul style="list-style-type: none">○ Hydraulic elevator reservoirs (11)○ Oil-filled electric transformers (14)
3	<p>SPCC Major Activities</p> <ul style="list-style-type: none">• Monthly inspections/records for bulk oil containers, less frequent for oil-filled equipment (elevator & transformer reservoirs)• Annual training for individuals with oil-handling, maintenance or spill response duties (scope and attendance documented)• SPCC plan update when changes are made to the Facility• SPCC plan review on annual basis• EPA reporting for large oil spills• Additional state requirements for tanks -- depending on size, type, construction



4	<p>Strategy for Plan Implementation</p> <ul style="list-style-type: none"> • Chancellor-directed campus-level responsibility of Plan implementation • Assign responsibility for plan implementation by operational area <ul style="list-style-type: none"> ○ Designate responsible staff/area lead for each operational area <ul style="list-style-type: none"> ▪ Area lead (Transportation Garage, Heating Plant, Electrical Transformers, Elevators, and Dining Services) ▪ Area lead conducts and reports monthly inspections and correction actions needed to EHS ▪ Area lead assigns training and assures completion of training ▪ Area lead reviews plan annually and provides updates to their respective portion of the SPCC plan • Collaborate with EHS for expertise and to document implementation <ul style="list-style-type: none"> ○ Local EHS provides oversight and continuity of plan, reviewing whether new or removed containers affect Plan. ○ Local EHS performs area lead responsibilities for the single Dining Services container (as determined) ○ EHS compliance staff initiates annual review with operational leads, updates plan, checklists and maps (checklists provided are now combined to include tank and SPCC requirements) ○ EHS staff develops training content customized for location ○ EHS compliance staff coordinates 5-year update of plan • Together determine groups of people for training and timing of training • Assess areas of programmatic overlap to minimize redundant activities and training events (eg. SPCC and tanks)
5	<p>Moving Forward</p> <ul style="list-style-type: none"> • Chancellor makes assignments of each operational area lead. • Chancellor signs SWPPP and returns signature page to EHS Compliance staff to finalize the plan. • EHS Compliance Staff compiles Plan and distributes to operational leads. • EHS Compliance Staff meets with group of leads to: <ul style="list-style-type: none"> ○ Discuss Plan goals, and implementation roles and responsibilities (see Plan for more on roles and responsibilities of each person). ○ Discuss inspection forms for each lead ○ Discuss training 'groups' by role and what content is appropriate for each group ○ Decide on any needed next steps or resources needed.