

**SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) –
INSPECTIONS & FUEL TRANSFER PROCEDURES**

The following UNL facilities are subject to SPCC regulations:

- City Campus Utilities
- East Campus Utilities
- Tractor Test
- Emergency generator serving the East Stadium
- Central Renewable Energy System Emergency Generator
- Certain locations at the Agricultural Research and Development Center

Each of these facilities has an individual and specific SPCC plan. In the plans, oil-handling personnel are required to conduct certain inspections at specified frequencies. Most of these inspections must be documented. These inspections include:

- Annual and after-use inspections of spill kits;
- Annual inspections of oil/fuel storage areas;
- Monthly inspections of visible portions of tanks, containers, piping, and foundations/support structures;
- Each transfer operation, although documentation is required only for those transfers involving 55 gallons or more and which are not conducted by pouring or use of hand pumps. “Transfer” does not include pumping fuel from a standard dispensing pump into a motorized vehicle.

Generic versions of these inspection forms are available in the appendix of this SOP. Inspection forms specific to each SPCC Plan are found in those plans. The forms are available from EHS upon request. The inspection forms must be maintained at the site, for a minimum of three (3) years, and in a readily-accessible manner so that they are immediately available to an agency inspector upon request. Methods for conducting these inspections are discussed in the on-line SPCC training required of all oil-handling personnel and are summarized below.

Annual and After-use Inspections of Spill Kits

Spill kits must be inspected annually and after use. The purpose of the spill kit inspection is to verify that the appropriate types and quantities of spill response materials are available. In addition, the regulations require that a copy of the SPCC plan be available at the facility.

- Physically verify that the correct amount and type of spill materials are present in the designated spill kit location. In most cases, this means 20 x 25 lb bags of loose absorbent; 40 socks; 100 pillows; 250 pads; and an elastomer drain cover for each sewer inlet in the immediate vicinity.

- Physically verify that a current copy of the SPCC plan is available at the spill kit location.
- Check to see if the supplies are in good shape.

Item	Replace if:
Loose granular absorbent	Wet
Socks	Moldy, crumbling
Pillows	Moldy, crumbling
Pads	Moldy, crumbling
Sanitary drain cover (elastomer mat)	Cracked, melted, 'glued to itself'
Storm drain cover (elastomer mat)	Cracked, melted, 'glued to itself'
Sand bags	Broken, leaking
SPCC Manual	Pages stuck together, lost, unreadable, out-of-date

Record corrective actions on the inspection log.

Annual Inspections of Oil/Fuel Storage Areas

As applicable, physically inspect and document the following:

- **Lighting.** All tanks/containers located outside of buildings must have some lighting near them to deter vandals and to allow for visual detection of releases. Lighting for tanks/containers inside of buildings may not be a deterrent but is critical for safe operations and detection of leaks.
- **Security.** All tanks must meet at least one of these three criteria: a) locked fill ports or access to fill ports; b) perimeter fencing that is locked when UNL operations personnel are not present; c) within a room that is not readily accessible to the public.
- **Loading/Unloading Inspections.** Verify that records for at least the past three years are readily available for all transfers involving 55 gallons or more and which were not conducted by pouring or hand pump.
- **Secondary Containment Integrity.** Inspect all visible portions of the secondary containment system. Look for significant cracks, rust, or other damage which may impair the system's ability to contain a spill.
- **Secondary Containment Volume.** Some secondary containment structures are exposed to precipitation. Minor amounts of water, ice, or snow are allowed to accumulate. Precipitation must be removed if the available secondary containment storage capacity is less than the volume of the oil tank plus the rainfall from a 24-hour, 25-year rainfall event (i.e., approximately 5.5 inches).
- **Alarms & Level Gages.** Verify adherence to the manufacturer's recommendations on the method and frequency of testing and preventative maintenance for alarms and/or level gauges.
- **Training Records.** Verify that records are available and complete to demonstrate that all oil-handling personnel at the site have completed initial training, as well as continuously completed their annual re-training obligations.

Notify EHS and your supervisor of any deficiencies noted during the inspection. Arrangements must be made to promptly remedy all deficiencies. If the deficiency is severe or is likely to result in a release, then it may be necessary to isolate/drain the system to prevent a release. Record corrective actions on the inspection log.

Monthly Inspections

Visually inspect the following items:

- Aboveground tanks/containers. Inspect for drip marks; discoloration of the surface of the container; puddles containing spilled or leaked material; corrosion and/or cracks; weep holes; or other signs of deterioration.
- Aboveground Pipes. Note that even underground tanks may have portions of pipes that are aboveground. Inspect for drip marks; bowing of the pipe between supports; discoloration of the surface of the pipe; puddles containing spilled or leaked material; corrosion and/or cracks; or other signs of deterioration.
- Aboveground Foundations/Supports. Note that even underground tanks may have aboveground 'foundations' around fill-pipes or as a protective surface over the tank. Inspect for settling; cracks; corrosion; gaps between the tank and foundation; drip marks; discolored surfaces; puddles containing spilled or leaked material; and damage to the foundation from plant roots.

Notify EHS and your supervisor of any deficiencies noted during the inspection. Arrangements must be made to promptly remedy all deficiencies. If the deficiency is severe or is likely to result in a release, then it may be necessary to isolate/drain the system to prevent a release. Record corrective actions on the inspection log.

Transfer Inspections

In accordance with UNL's SPCC plans, National Fire Protection Association Codes, industry standards, and regulatory requirements, transfer operations must be attended. This allows for prompt detection of leaks/failures so that actions can be implemented to minimize releases and resulting adverse impacts. As a matter of method, UNL oil-handling personnel and fuel tank delivery drivers must both determine the available capacity of the tank before filling tanks from a fuel delivery truck. In addition, liquid tight connections must be used when the transfer involves 1,000 gallons or more. The entire transfer operation must be immediately attended and in a manner that allows prompt visual detection of a release and immediate access to flow valves/levers on the delivery truck/apparatus. The inspection log provides a means of documenting that these practices were observed and to verify that releases did not occur. The log is to be completed by the UNL employee responsible for the transfer and maintained for at least three (3) years.

