



The rising STAR of Texas

**SPILL PREVENTION CONTROL AND
COUNTERMEASURE PLAN (SPCC)**

Texas State University Round Rock Campus

**April 2020
Updated April 2021**

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1.0 INTRODUCTION

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by Texas State University (University) to prevent oil discharges from occurring, and to prepare Texas State to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the campus. This plan was prepared by Westward Environmental, Inc. and accepted by Texas State University's Environmental Health, Safety and Risk Management Office (EHSRM).

1.1 REGULATORY OVERVIEW AND APPLICABILITY

This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in 40 CFR Part 112. These regulations apply to Texas State because the total storage capacity of oil in above ground storage units (those that are greater than or equal to 55-gallons) is greater than 1,320 gallons. Oil includes, but is not limited to gasoline, diesel fuel, lubricating oils, mineral oil, petroleum based hydraulic oil, vegetable oils and oily wastes. **Table 1-1 (Appendix A)** provides a cross reference of the 40CFR Part 112.7 requirements and the sections in this plan where they are addressed.

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a guide on facility inspections and as a tool to communicate practices on preventing and responding to discharges with Texas State employees and contractors.

1.2 MANAGEMENT APPROVAL

The University is committed to maintaining the highest standards for preventing discharges of oil to navigable waters and the environment through the implementation of this SPCC Plan. This SPCC Plan has the full approval of Texas State management. Texas State's management has committed the necessary resources to implement the measures described in this Plan.

Mr. Eric Algoe, Vice President, Finance and Support Services, is the designated person accountable for oil spill prevention at the University and has the authority to commit the necessary resources to implement the Plan as described.

Signature _____ 

Name Eric Algoe


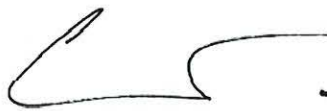
Title Vice President, Finance and Support Services

Date 4-12-2021

1.3 PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I or my agent visited and examined the Texas State University Round Rock Campus on July 30, 2019. I have completed a review and evaluation of this Spill Prevention Control and Countermeasures (SPCC) Plan (Project Number 10684-021), and being familiar with the requirements of 40 CFR Part 112 (Oil Pollution Prevention) and applicable industry standards, attest that it has been prepared in accordance with good engineering practices, including consideration of applicable industry standards. Inspection and testing procedures have been established in this Plan. This Plan is adequate for the facility. This is contingent on the University's installation of additional equipment, implementation of the additional procedures, and completion of the other actions described in this plan. Certification of this document in no way relieves Texas State of the responsibility to fully implement this document and associated procedures and policies or to review, revise, or amend this document in accordance with 40 CFR Part 112.

Signature



Name

Curt G. Campbell, P.E.

Title

VP Engineering & Natural Resources

Date

4/2/2020

Westward Environmental, Inc. - Texas Firm Registration # F- 4524

1.4 PLAN REVIEW

In accordance with 40 CFR 112.5, the University periodically will review and evaluate this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge. The EHSRM office will review and recertify this SPCC Plan at least once every five years. The review will include an evaluation of the plan's compliance with any SPCC rule revisions that have occurred since preparation of the plan or the last plan review.

Revisions to the Plan, if needed will be made within six months of this five-year review. The University will implement any amendment as soon as possible, but not later than six months following preparation of any amendment. A registered PE will certify any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). These include facility, plan, policy, or procedural modifications that require engineering judgment and include, but are not limited to the following:

- Variations in container or containment unit design or construction
- Modifications to transfer pipe and hose layouts such that the ability to discover a release is diminished or containment capacity documented herein is reduced
- Changes in product in an existing container unless the product characteristics are the same
- Changes in the container service (e.g. changes in pressure or temperature and removal of a container from service);
- Changes in procedures that would reduce the frequency of inspections, testing or preventative maintenance
- Changes in procedures or policies that would decrease the level of release prevention provided.

Scheduled five-year reviews and Plan amendments will be recorded in **Table 1-2**. This log must be completed even if no amendment is made to the Plan. Unless a technical or administrative change prompts an earlier review, the next scheduled review of this Plan must occur by *April 2025*.

1.5 LOCATION OF SPCC PLAN

In accordance with 40 CFR 112.3(e), a copy of the SPCC plan is located on campus at the Central Utility Building office of the Texas State University Round Rock Campus, as well as at the Environmental Health Safety and Risk Management Office at Texas State University's San Marcos campus. The address for the Texas State University Round Rock Campus is 1555 University Boulevard, Round Rock, TX 78665-8017 and the address for the university's main campus is 601 University Drive, San Marcos, Texas 78666-4684.

1.6 CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

The following questions were taken from the SPCC Guidance Document for Regional Inspectors, EPA, December 16, 2013 to determine if a facility is required to develop a Facility Response Plan. If the answer to all questions is "No", then Texas State does not need to comply with the Facility Response Plan requirements in 40 CFR 112 Subpart D.

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 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) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

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) such that a discharge from the facility would shut down a public drinking water intake?

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 spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes _____ No X

1.7 CERTIFICATION OF COMPLIANCE WITH 40CFR112.20

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. I certify that Texas State University-San Marcos does not exceed the quantity requirements specified in the substantial harm criteria and is not required to prepare a Facility Response Plan.

Signature: _____ Date: _____

2.0 GENERAL FACILITY INFORMATION

2.1 CONTACT INFORMATION

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the director of Environmental Health, Safety and Risk Management. The 24-hour contact information is provided in **Table 2-1**.

Personnel from the Central Utility Building provide the day-to-day inspection and maintenance activities for the generators, transformers, switches and chemical storage tanks at the utility plant and other buildings on campus. The mechanics inspect, test and fill the numerous generators located on campus. The electricians inspect and maintain the transformers and switches for the campus. These key contacts for Texas State are included in **Table 2-1**.

2.2 FACILITY LAYOUT AND DRAINAGE PATHWAYS

Appendix B contains drawings showing the area location and site-specific information. As shown, in the area location map (**Figure 2-1**), Texas State is located in Round Rock, Texas, east of IH-35 on University Boulevard between Avery Nelson Boulevard and Seton Parkway. The site plan in **Figure 2-2** shows the location of the facility relative to waterways, roads, and inhabited areas. It also shows the general direction of stormwater surface flow, which is to the northwest through a detention pond prior to leaving the campus south of the intersection of University Boulevard and Seton Parkway. From the campus, water follows natural topography and man-made conveyance channels southeast to Brushy Creek.

Oil storage occurs in aboveground storage tanks located at oil-filled operational equipment, primarily emergency generators and transformers/switches. **Figure 2-3** is a detailed facility diagram that shows the locations of the diesel-powered emergency generators with storage tanks greater than or equal to 55-gallons, as well as the location of the transformers and switches with oil storage capacity of 55 gallons or more.

2.3 FACILITY OPERATIONS

The primary operation at the University is education. Steam and chill water provide heating and cooling to the campus via the Central Utilities Building, which has bulk chemical storage tanks for water treatment and fuel oil storage for the nearby emergency generator. Other support operations for the campus include additional emergency backup generators, and operational equipment including large transformers and switches.

2.4 OIL STORAGE AND HANDLING

Aboveground Storage Tanks

Most of the oil storage at the facility is in aboveground storage tanks attached to emergency generators. Small oil tanks are stored in the basement near each elevator shaft; these tanks each hold a small amount of lubricating oil. All fuel and oil storage tanks are shop-built and meet the American Petroleum Institute (API) tank construction standard. Their design and construction are compatible with the oil they contain and the temperature and pressure conditions of storage. The requirements of 112.8/112.12(c)(8) do not apply to the tanks on campus as they are all non-pressurized tanks and filled in batches by hand (i.e. not constant feed).

Underground Storage Tanks

There are no underground storage tanks containing hydrocarbons at the Round Rock campus.

Generators

Generators are located at each of the buildings on campus for use as backup power. Generators have self-contained steel tanks inside the units and use diesel as fuel. The tank sizes range from 1,000 to 1,500 gallons. The campus's main generator at the Central Utilities Building is run on natural gas and is not included in fuel storage numbers for the campus.

Secondary containment for portable generators is provided either by double-walled tanks on the generator units themselves or by a concrete secondary containment.

Transformers and Switches

Transformers, like generators, are located throughout the campus. The larger transformers hold from 300 to 800 gallons of mineral oil.

Table 2-2 lists all the oil containers discussed above present at the University with capacity of 55 gallons or more. This table also provides tank details and total volume of oil estimated to be stored on campus. The total amount is approximately 4,600 gallons.

2.5 PROXIMITY TO NAVIGABLE WATERS

Navigable waters as defined by 40CFR Part §110.1 include certain interstate lakes, rivers and streams (including intermittent streams). Navigable water may also be interpreted to include ground water if the ground water is hydraulically connected to surface waters and releases to ground water could potentially be discharged to surface water. Brushy Creek is located approximately 5.8 miles downstream from the Texas State University Round Rock Campus.

2.6 CONFORMANCE WITH APPLICABLE STATE AND LOCAL REQUIREMENTS

State requirements for spills to the environment are found in 30 Texas Administrative Code (TAC) Chapter 327. This chapter describes the actions that the responsible party must take in response to a spill to the environment but does not give specific spill prevention requirements.

Reportable quantities for spills of oil, petroleum products and used oil are in §327.4 and are:

1. 25-gallons for spills onto the land.
2. For spills to the waters of the state, any quantity to cause a sheen.

Reportable quantities of hazardous substances to soil and water are in 40CFR§ 302.4:

1. R.Q. for many chemicals are listed in Table 302.4.
2. R.Q. for non-hazardous chemicals (paint, ferric substances, food waste, etc.) is 100 pounds per 30TAC§327.4(2).

The SPCC Plan was written to comply with 40 CFR Part 112 requirements which are more stringent than either the local or State requirements. All discharge notifications will be made in compliance with local, state, and federal rules. All reportable Spills must be documented using figure 3-2 found in the Appendix page B-6.

3.0 SPILL RESPONSE AND REPORTING

The level of spill response and reporting will be determined by the type of spill that occurs. There are both incidental spills and nonincidental spills. These spills are described below to assist the responder in carrying out the correct actions.

3.1 INCIDENTAL (SMALL OR MINOR) SPILLS

An incidental spill is defined as

- a small spill, less than 5 gallons
- of known composition
- one that does not enter a storm drain or cause a sheen on a surface water
- one that does not exceed the EPA reportable quantity.

For the purposes of this plan, an “incidental spill” is considered to be anything less than a 5-gallon spill of oil, used oil or other petroleum products. A spill may also be considered to consist of any known hazardous substance (ie: acids, etc.) located at the University which must be cleaned up for the protection of human health and the environment. General response procedures for these types of materials are addressed in **Appendix C** of this SPCC Plan, and further information may be available from the EHSM office.

Cleanup will be handled by Texas State University Round Rock Campus staff working in the oil storage area with the assistance of the EHSRM office. Cleanup personnel may utilize Personal Protective Equipment (PPE) such as rubber boots and Tyvek to reduce potential contamination. Cleanup will include absorbing the oil onto absorbent pads or using dry absorbent granule materials, placing it into a bag with a waste tag on it and calling EHSRM for pickup. A coating (manufacturer's recommended amount) of MicroBlaze®, a bioremediation agent, will also be applied by EHSRM and / or Texas State University Round Rock Campus staff to further break down the residual oil if the spill is to land or other surface. MicroBlaze® will not be applied onto a natural water body.

3.2 NON-INCIDENTAL (LARGE OR MAJOR) SPILLS

Non-incidentals spills include the following:

- Spills that are larger than 5 gallons
- Spills that exceed the reportable quantity (i.e. more than 25 gallons of oil onto land or more than enough to cause a sheen of oil on surface water).
- Spills where the regulatory reportable quantity is exceeded.
- Spills that may reach a water body through soil, storm drain, floor drains, and overland flow.

For these larger spills, the observer should attempt to stop the source of the release (if safely possible), isolate the spilled material (if feasible), and call the EHSRM office and 911.

The City of Round Rock Fire Department will support the initial spill response with the assistance of EHSRM and / or Texas State University Round Rock Campus staff. For illicit discharges to the MS4 or nearby waterways, contact City of Round Rock MS4 for notification within 24 hours of discovery. EHSRM will contact their contracted Spill Response Company for complete remediation and spill cleanup. EHSRM is responsible for notifying TCEQ of spills that exceed the reportable quantity to land or surface water.

3.3 EMERGENCY COORDINATOR/CALL SEQUENCE

Table 3-1 lists the names of the Emergency Coordinator and the designated alternate at the University along with contact information. The Emergency Coordinator is familiar with all aspects of the SPCC Plan, all operations and activities at the University, the location and characteristics of oil storage locations and the facility layout. In addition, the Emergency Coordinator has the authority to commit the resources needed to carry out the SPCC.

Figure 3-1 shows the sequence of spill notification and the coordination that will occur in the event that assistance from outside emergency responders (city or contract) is requested. The internal University notification requirements and the regulatory and outside responder contacts are listed in **Table 3-1**.

3.4 VERBAL NOTIFICATION REQUIREMENT (LOCAL, STATE AND FEDERAL)

If the spill of oil is enough to cause a sheen on the local waterways (Brushy Creek or an unnamed tributary of same) or the spill exceeds 25 gallons to land (reportable quantities), EHSRM is responsible for notifying the following regulatory agencies within 24-hours by phone or fax:

- TCEQ 24-hour Emergency Spill Reporting 1-800-832-8224 CHEM-TEL
- Region 11 TCEQ 512-339-2929 during business hours; 512 339-3795 (fax)
- Williamson County Local Emergency Planning Committee (LEPC) 512-943-1911
- National Response Center (NRC) 1-800-424-8802

For illicit discharges into the MS4 or nearby waterways, contact the City of Round Rock MS4 (512-218-5400) for notification within 24 hours of discovery.

The fax form in **Figure 3-2** shows the information that will be submitted to comply with State and Federal requirements.

3.5 WRITTEN NOTIFICATION REQUIREMENT (LOCAL, STATE AND FEDERAL)

Within 30 days of the incident described in Section 3.4, the EHSRM office will submit a written report to the Regional TCEQ office. The written report will contain the faxed information and one of the following items, as applicable:

1. A statement that the discharge or spill response action has been completed and a description of how the response action was conducted.
2. A request for an extension of time to complete the response action, along with the reasons for the request. The request will also include a projected work schedule outlining the time required to complete the response action. The TCEQ may grant an extension of up to 6 months from the date of the spill or discharge was reported. Unless otherwise notified, by the appropriate regional manager, the University will proceed according to the terms of the projected work schedule.
3. A statement that the discharge or spill response action has not been completed nor is it expected to be completed within the maximum allowable six-month extension. The statement shall explain why completion of the response action is not feasible and include a projected work schedule outlining the remaining tasks to complete the response action. This information will also serve as notification that the response actions will be conducted under the Texas Risk Reduction Program rules in 30TAC Chapter 350.

3.6 REPORTING TO NATIONAL RESPONSE CENTER (FEDERAL REQUIREMENT)

If Texas State experiences a release of greater than or equal to 1000 gallons of oil, or two or more discharges of 42 gallons or more within a 12-month period, Texas State will provide information to the federal government's centralized reporting center, NRC. EPA Region 6 will also be notified for releases to inland areas and waters that cause a sheen (reportable quantity). Calling the National Response Center (NRC) within 24-hours of the release satisfies the reporting requirement to EPA.

A written report will be sent within 30 days to:

EPA Region 6
Prevention and Response Branch
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

EPA Region 6 may request an amendment to this plan to prevent future releases. The University will revise or amend the plan at EPA's request.

4.0 EMERGENCY EQUIPMENT

The University maintains safety equipment to respond to small incidental releases of oil (5-gallons or less). The University maintains a stock of supplies to assist the Round Rock Fire Department or outside contractors to respond to releases larger than 5-gallons. The University personnel stay in contact with one another and outside emergency services through the use of land-based phones and cell phones.

Table 4-1 lists the emergency response equipment maintained at the University. The location and capability of the equipment is also included in **Table 4-1**. The University waste pickup vehicle is equipped to respond to larger releases from San Marcos, however most of the same cleanup supplies located in the vehicle are also stored at the Texas State University Round Rock Campus in the basements of the Nursing Building, Avery Building and Willow Hall, as well as the Central Utilities Building.

5.0 EMERGENCY RESPONSE PROCEDURES

5.1 IMMEDIATE RESPONSE PROCEDURES

- Notify persons in the immediate area about the spill and evacuate non-essential personnel from the spill area that may be impacted by vapors or potential fire.

- Call UPD at 911 from a campus phone or (512) 245-2805 by cell phone to report the spill.
- Notify Facilities Manager (512-716-2964 office; 512-626-7695 cell phone) and the Central Plant at the San Marcos campus (512-245-2108) of the spill.
- Notify EHSRM (business 512-245-3616; after hours 512-738-6650).
- If possible to do so safely, stop the source of the spill/release and turn off any nearby ignition sources.
- Use any available spill control supplies in the area or contact EHSRM (512-245-3616; or 512-738-6650 after hours) to mobilize supplies.
- Try to block entry of the spill to storm drains, floor drains, creeks, or the river.
- If the spill is incidental (see Section 3.1), clean up immediately.
- If the spill is non-incidental (see Section 3.2) EHSRM will contact the emergency response contractor for additional assistance.

5.2 SPILL CONTAINMENT, CLEANUP AND DISPOSAL

Immediate action will be taken to confine the spill to the containment unit or to the immediate area. Spills captured by an oil/water separator will be contained by plugging drain lines in sumps and trenches; disengaging automatic sump pumps; placing temporary covers over drain inlets; etc. If a spill enters a drainage ditch, efforts will be made to confine the spill using dams, booms and absorbent material.

Once a spill has been contained, absorbent will be used to soak up the spill. The spill and absorbent will be placed in an open top drum or bagged. The spill will be cleaned up from the outer edges working inward. Rubber boots and Tyvek may be worn to reduce potential contamination of the cleanup personnel. A coating of MicroBlaze® will be applied to spills of oil, diesel, gasoline or other petroleum-based spills to decompose residual oil. The recovered material will be classified following the RCRA Waste Analysis Plan and disposed of offsite at a permitted facility.

6.0 SPILL PREVENTION AND COUNTERMEASURES PROVISIONS

6.1 POTENTIAL DISCHARGE VOLUME AND DIRECTION OF FLOW

The potential discharge volume of each storage unit is given in **Table 6-1**. **Figures 2-2 and 2-3** show the locations of the units across campus and the most likely direction of flow. In general, the units at the Texas State University Round Rock Campus would flow northeast to the detention pond near the intersection of University Boulevard and Seton Parkway before leaving the campus property and flowing through open ditches and underground piping toward Brushy Creek located about 5.8 miles southeast of the campus.

Oil containing units located at the Texas State University Round Rock Campus represent a low potential of impacting the river due to their proximity and the presence of intercepting ponds and other stormwater detention units to divert the oil spill.

Table 6-1 provides a possible spill scenario for the oil containing units, the estimated volume of the spill and the direction of flow. Existing and proposed containment or diversionary structures are listed.

6.2 CONTAINMENT AND DIVERSION STRUCTURES

Secondary containment is provided for all of the above ground storage tanks located outside.

All generators that use diesel fuel on campus meet secondary containment requirements by being equipped with double walled fuel tanks. Portable fuel tanks used to refill the generators and equipment are provided either by an outside contractor or by service trucks from the San Marcos campus, neither of which will be stored onsite at the Texas State University Round Rock Campus. Portable fuel tanks temporarily onsite are constantly visually monitored.

Secondary containment is not required for electrical operating equipment (e.g. transformers and switches) or oil filled operating equipment (elevators) per 40 CFR 112.2. However, this equipment must meet the general requirements of 112.7 and will be included in the regular inspection schedule. The transformers located at the Nursing Building and Willow Building are surrounded by secondary containment consisting of concrete walls and floors with a steel grated cover.

Existing and future planned secondary containment will comply with the facility drainage requirements in 40 CFR 112.8(b). These include design features such as use of manual open and close valves in containment walls or use of manually operated pumps to remove stormwater.

All collected liquids must be visually monitored to ensure no oil sheen is present prior to discharge. Texas State will use secondary containment rather than designed facility drainage (112.8(b)(3)) to collect potential releases of oil. Diversion structures (ponds, concrete catch basins) are designed on campus for storm-water management, not oil spills.

6.3 OVERFLOW PREVENTION MEASURES

The only tanks at the Texas State University Round Rock Campus that are refilled with fuel or oil are the diesel-powered generators. Standard operating procedures for filling the fuel tanks are followed and include:

- A staff person oversees the filling (generally a mechanic).
- Fuel inventory in the storage tanks is monitored and refilling is a lesser volume than remaining tank capacity.
- Drips that may occur during filling are caught in a bucket or pad and disposed of in an oily rag container at the Central Utilities Building.
- The tanks do not have a high-level alarm per 40CFR 112.8/112.12(c)(8) so use of manual filling is the only method used. There is no use of automatic fuel pumping based on low- and high-level indicators.

- The requirements of §112.8/112.12(c)(8) do not apply to the tanks on campus as they are all non-pressurized tanks and filled in batches by hand (i.e. not constant feed).

6.4 INSPECTIONS, TESTS AND RECORDS

Inspections of all oil storage units listed in **Table 2-2** are performed on a monthly basis. Operating equipment (transformers, switches) is inspected on a quarterly basis. **Figures 6-1 and 6-6** show the checklists that are used for these inspections.

Data collected from the inspections are entered into an electronic database system and any deficiencies are noted. A primary responsible party is assigned to each oil storage unit and this party is contacted to correct any deficiencies found. The inspection forms and database are retained in the University's environmental files.

During the last week of the month, the electronic inspection database is extracted for the month and prepared into a summary report. The report shows the units inspected, the inspectors and whether the unit passed or failed the inspection. The number of units inspected is compared to the actual number of units requiring inspection and the percent completed is calculated. If less than 100% completion is found, the missing inspections are identified and completed. Using this process, 100% of all units requiring inspection are completed.

Integrity Testing Procedures

Some shop fabricated tanks and piping are subject to periodic integrity testing to determine the physical condition of the tank under the SPCC rule. The accepted industry standard for integrity testing is the Steel Tank Institute (STI) SP-001-03, *Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids*. Because of the sizes of tanks at the Texas State University Round Rock Campus and the fact that all tanks are provided with adequate secondary containment, integrity testing is not required for tanks at this facility.

7.0 PERSONNEL TRAINING

Under the SPCC regulations, all oil-handling employees at the facility are to receive annual training on the following:

- The operation and maintenance of equipment to prevent discharges
- Discharge procedure protocols
- Applicable pollution control laws, rules, and regulations
- General facility operations
- The contents of the facility SPCC Plan

Personnel working with oil should know the contents of the SPCC Plan and receive training to properly respond to spills in their work area. The EHSM Office has developed a PowerPoint training program that addresses the elements listed above for the campus. The following offices and spill contractors

were identified as having staff that potentially could handle oil or petroleum substances in their job duties:

- Facilities (Grounds, Utility Operations, Utility Maintenance)
- Auxiliary Services
- Contracted Services – Gruene Environmental (830-626-7575); National Response Corporation (formerly SWS/Eagle – 210-566-8366; TAS Environmental (512-990-9903).

Classroom training or computer-based training (SAP) will be utilized to provide initial training when employees are hired followed by scheduled annual update training for each year. Training will be accomplished through a variety of methods that may include:

- Classroom training with EHSRM instructors
- Classroom training with contracted instructors
- Classroom training with instructors from each department (EHSRM would “train-the-trainer”)
- Computer training through the university’s SAP program

The tracking method for training consists of an online program utilized by all Texas State University personnel. Records of training are maintained by EHSRM personnel at the university’s San Marcos campus. To increase awareness of the Plan within the Texas State University campuses, the SPCC program will be included in the campus Public Safety and Health University Policy and Procedures (UPPS 04.05.15). This UPPS was developed by the EHSRM office in 2014 and includes many of the safety and environmental-related policies and procedures under one UPPS.

8.0 SECURITY

Security of oil containing units at the University is not accomplished by the structures described in 40 CFR 112.7g (fencing, locked gates, guard gates). The University is a public facility and is not secured in this manner. Alternative security features that provide equivalent environmental protection from vandalism of oil containing units are:

- The University is generally patrolled by the University Police Department regularly during the day and on call at night.
- Fuel storage tanks in generators are generally behind locked panels.
- Operating electrical equipment is located in locked buildings or oil storage (i.e. mineral oil) is behind locked panels.
- The campus is well lit.
- The Central Utilities Building is fully fenced, is operational 24/7, and can be monitored by Central Plant in San Marcos.

APPENDIX A

Tables

Table 1-1
Cross-Reference with SPCC Rule – Texas State University Round Rock Campus

Provision*	Plan Section	Page(s)
112.3(d)	Professional Engineer Certification	5
112.3(e)	Location of SPCC Plan	6
112.4	Plan Review by Regional Administrator	N/A
112.5	Plan Review by Owners or Operators	6
112.6	Reserved	N/A
112.7	Management Approval	4
112.7	Cross-Reference with SPCC Rule	A-2
112.7(a)(3)	General Information and Facility Diagram	8, B-2, B-3, B-4
112.7(a)(3)(i)	Oil Storage Container and Oil Type	9, A-5
112.7(a)(3)(ii)	Discharge Prevention Measures	14 - 16
112.7(a)(3)(iii)	Secondary Containment	15
112.7(a)(3)(iv)	Countermeasure	14 - 16
112.7(a)(3)(v)	Methods of Disposal of Recovered Material	14
112.7(a)(3)(vi)	Telephone List for Emergency Response/Reporting	A-6 – A-7
112.7(a)(4)	Spill Response Format	B-6
112.7(a)(5)	Spill Response Procedures	10-14
112.7(b)	Potential Discharge Volume and Direction of Flow	14, A-9, B-3
112.7(c)	Containment and Diversionary Structures	15
112.7(d)	Contingency Plan if Secondary Containment is Not Applicable	N/A
112.7(e)	Inspections, Tests and Records	16
112.7(f)	Personnel Training and Discharge Prevention Procedures	16-17
112.7(f)(2)	Designate a person at each facility who is accountable for discharge prevention	A-4
112.7(g)	Security	17
112.7(h)	Tank Truck Unloading Procedures/Containment	N/A
112.7(i)	Field Constructed Tanks	N/A
112.7(j)	Conformance with Applicable State and Local Requirements	4
112.8/112.12(b)	Facility Drainage	N/A
112.8/112.12(c)(1)	Bulk Storage Containers – Materials of Construction	9
112.8/112.12(c)(2)	Bulk Storage Containers – Secondary Containment	14-15
112.8/112.12(c)(3)(iv)	Records retention for drainage of rainfall from containments	N/A
112.8/112.12(c)(4)	Protect any completely buried tanks from corrosion	N/A
112.8/112.12(c)(5)	Bulk Storage Containers – Partially Buried	N/A
112.8/112.12(c)(7)	Bulk Storage Containers – Leakage Through Heating Coils	N/A
112.8/112.12(c)(8)	Requirements for continuous flow tanks (alarms, etc.)	N/A
112.8/112.12(c)(9)	Bulk Storage Containers – Efficient Treatment Facilities	N/A
112.8/112.12(c)(11)	Containment for Mobile Devices	N/A
112.8/112.12(d)	Facility Transfer Operations, Pumping and Facilities Process	N/A
112.20	Certification of Substantial Harm Determination	7

* Only relevant rule provisions are indicated. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Table 1-2
Record of Plan Review and Changes – Texas State University Round Rock Campus

Date	Authorized Individual	Review Type	PE Certification	Summary of Changes
April 2021	Lynn Lindsay	Non-Technical	No	Bulk Chemical Storage Names Updated
September 2019	Lynn Lindsay	Initial Plan	Yes	N/A

Notes:

1. If changes are technical in nature, then a P.E. certification is needed. Non-technical changes (telephone numbers, page numbers, name changes, etc.) do not require a P.E. certification.
2. Plan must be reviewed every 5 years.

Table 2-1
Facility Contact Information
Texas State University Round Rock Campus

Department	Office Telephone	Address/Building	Plan Location
EHSRM	512-245-3616	601 University Drive San Marcos, TX 78666 Smith House	Smith House
Texas State University Round Rock Campus (Facilities Manager)	512-716-2964	1555 University Blvd. Round Rock, TX 78665-8017	Office Central Utility Bldg.

After hours and on weekends, the Facilities Manager (512-626-7695) can be contacted for on call mechanics, electricians, and shop support for the Texas State University Round Rock Campus.

Table 2-2
Inventory of Oil Storage Units
(Greater Than 55-Gallon Capacity)
Texas State University Round Rock Campus

Type	Location	Construction	Primary Content	Capacity (gallons)
Generator with built-in tank	Avery Building	Steel	Diesel	1,500
Generator with built-in tank	Nursing Building	Steel	Diesel	1,000
Transformers	Campus	Steel	Mineral Oil or FR3 Oil	350 (avg) x 6 units 2,100
			TOTAL	4,600 gallons

Table 3-1
Hazardous Waste Spill Notification References
Texas State University Round Rock Campus

LOCAL RESPONSE TEAM					
POSITION/TITLE	NAME	RESPONSE TIME	OFFICE	HOME	CELL
Emergency Coordinator University Police (receives all 911 calls made from campus)	Emergency Management Director	15 minutes	On campus: 911 OR (512) 245-2805 (UPD Non-Emergency)		
Emergency Coordinator Alternate	On Call RR FM Staff	45 minutes	(512) 716-2964 RR FM Office		(512) 626-7695 (on call phone)
Emergency Coordinator Alternate Backup	EHSRM	90 minutes	(512) 245-3616 EHSRM Office		(512) 738-6650 (on call phone)
Additional Resources/Support (maintains list of University Contacts and home numbers)	CENTRAL PLANT	90 minutes (from San Marcos); 45 minutes (local response)	(512) 245-2108		
AGENCY			OFFICE	ALTERNATE	
National Response Center (NRC)			(800) 424-8802	(202) 267-2675	
TCEQ 24-hour Environmental Release Hotline (Chem-Tel, Inc.)			(800) 832-8224		
Williamson County Emergency Management Dept. (LEPC)			(512) 943-1911		
Texas Commission on Environmental Quality Region 11			(512) 339-2929	(512) 339-3795 (fax)	
Texas Commission on Environmental Quality - Central Office			(800) 832-8224 (24 Hrs. Chem-Tel, see above)	(800) 832-8224 (24 Hrs. Chem-Tel, see above)	
U.S. Fish and Wildlife Service (USFWS)			(512) 490-0057		
U.S. Environmental Protection Agency (EPA) – Region VI			(866) 372-7745	(214) 665-6428	
Texas Parks and Wildlife Department (TPWD)			(512) 389-4848	(512) 912-7154	
Texas Department of State Health Services			(512) 458-7111	1-888-963-7111	
Texas Highway Patrol (Department of Public Safety)			911	(512) 353-7000	
City of Round Rock MS4			(512) 218-5400		

Table 3-1
Hazardous Waste Spill Notification References
Texas State University
(Continued)

COMPANY	OFFICE	ALTERNATE
Gruene Environmental Companies	(830) 626-7575	
National Response Corporation	(210) 566-8366	(877) 742-4215
TAS Environmental	(512) 990-9903	
LCRA Environmental Lab Services	(512) 730-6022	(877) 362-5272
San Antonio Testing Laboratory	(210) 229-9920	

SERVICE	PRIMARY	ALTERNATE
Williamson County Sheriff	911	(512) 943-1300
Round Rock Police Department	911	(512) 218-5500
Round Rock Fire Station 7	911	(512) 671-2788
Round Rock Utilities and Environmental Services	(512) 218-5555	
Williamson County EMS	911	(512) 943-1264
Ascension Seton Williamson Hospital / Medical Center (life-threatening emergency)	911	(512) 324-4000

Table 4-1
List of Emergency Response Equipment/Locations
Texas State University Round Rock Campus

Name of Equipment	Locations			
	Central Utilities Building	Avery Building	Nursing Building	Willow Building
1. Pads Universal (minimum 3 boxes)	X	X	X	X
2. Pads Oil Only (minimum 3 boxes)	X	X	X	X
3. Boom Oil Only (3 foot) (minimum 3 boxes)	X	X	X	X
4. Boom Universal (3 foot) (minimum 3 boxes)	X	X	X	X
5. Boom Oil Only (6 foot)	X	X		
6. Soda Ash (minimum 5 25-pound buckets)	*1	*2	X	
7. Dry absorbent (minimum 100 pounds)	X			
8. Open top 30-gal or 55-gal drums (minimum 2)	X	X		
9. Miscellaneous supplies (shovels, gloves, goggles, bags, buckets)	X	X		

Notes:

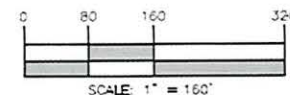
- *1 Recommended Amount
- *2 Small quantities
- X Required

Table 6-1
Potential Discharge Volume and Direction of Flow for Oil Storage Units
Texas State University

Name/Location	Fuel Tank Size (gal)	Type of Failure	Maximum Discharge Rate (gal/hour)	Maximum Volume (gal)	Direction of Flow	Containment or Diversion Structures
<u>Generators</u>						
Avery Building	1500	leak	1	1500	Northeast to detention pond on campus; then southeast toward Brushy Creek	Double walled tank
Nursing Building	1000	leak	1	1000	Northeast to detention pond on campus; then southeast toward Brushy Creek	Double walled tank
<u>Transformers (Oil-Filled Operational Equipment)</u>						
Central Utilities Building	~350	Catastrophic	N/A	~350	Northeast to detention pond on campus; then southeast toward Brushy Creek	Facility and utility provider will respond to loss of power at unit
Avery Building	~350	Catastrophic	N/A	~350	Northeast to detention pond on campus; then southeast toward Brushy Creek	Facility and utility provider will respond to loss of power at unit
Nursing Building	2 @ ~350	Catastrophic	N/A	~350	Northeast to detention pond on campus; then southeast toward Brushy Creek	Concrete containment for 1 of 2 units. Facility and utility provider will respond to loss of power at unit
Willow Building	2 @ ~350	Catastrophic	N/A	~350	Northeast to detention pond on campus; then southeast toward Brushy Creek	Concrete containment for 1 of 2 units. Facility and utility provider will respond to loss of power at unit

APPENDIX B

Figures



LEGEND

- EXISTING FENCE/GATE
- - - DRAINAGE PIPE
- - - DITCH-SWALE
- FLOW ARROW
- GENERATOR
- TRANSFORMER
- FR3 TRANSFORMER (VEGETABLE OIL)

1. NO KNOWN REPORTABLE SPILLS HAVE OCCURRED ON-SITE WITHIN THE LAST 3 YEARS.
2. FLOW ARROWS INDICATE GENERAL STORMWATER FLOW FROM CAMPUS TANK STORAGE AREAS ON-SITE. THESE ARROWS MAY INDICATE SURFACE WATER FLOW OR SUBSURFACE STORMWATER CONVEYANCES. IN THE EVENT OF A CATASTROPHIC FAILURE FROM A GENERATOR OR TRANSFORMER, IT IS POSSIBLE THE FUEL OR OIL CONTAINED WITHIN MAY FOLLOW THE SAME ROUTE STORMWATER FLOWS. HOWEVER, DUE TO THE SIZE OF THE STORMWATER CATCH BASIN AT THE NORTHEAST CORNER OF CAMPUS AND THE LONG TRAVEL DISTANCE THAT WOULD BE REQUIRED, IT IS NOT ANTICIPATED THAT A SPILL FROM A HYDROCARBON STORAGE VESSEL AT THIS FACILITY WOULD BE ABLE TO REACH A DERIVED WATER BODY.
3. FR3 TRANSFORMERS, AS INDICATED ABOVE, CONTAIN RENEWABLE VEGETABLE OIL INSTEAD OF MINERAL OIL AS A DIELECTRIC FLUID, AND ARE NOT SUBJECT TO SPCC RULES.

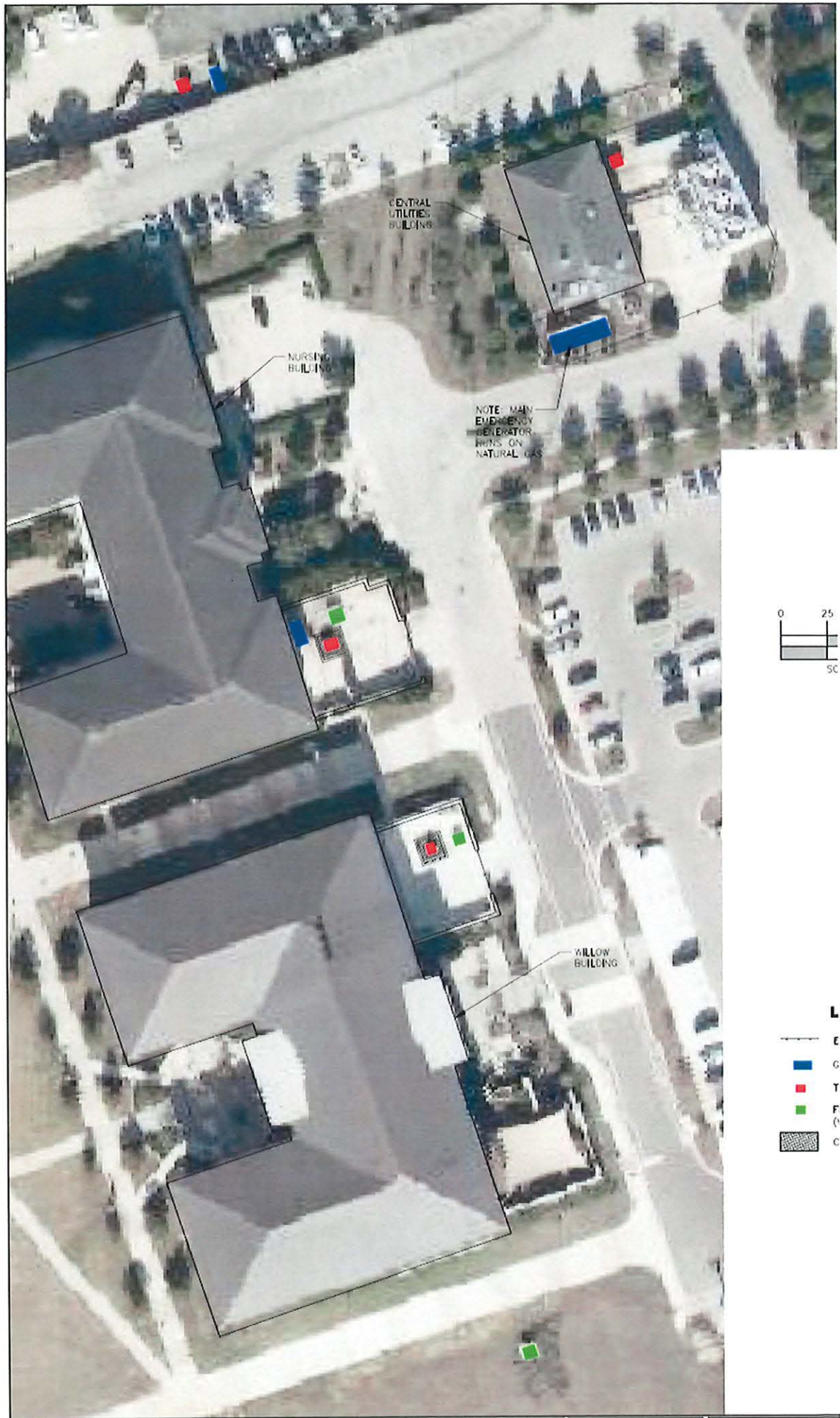


Figure 3-1
Spill Notification Sequence
Texas State University Round Rock Campus

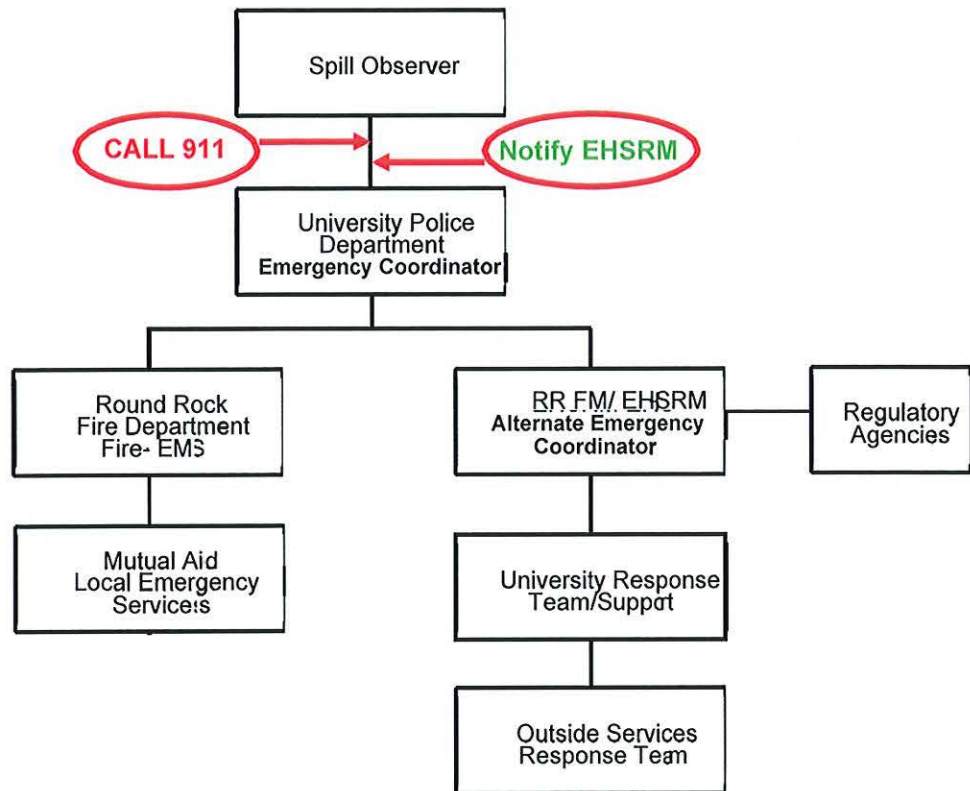


Figure 3-2
24-Hour Notice of Spill/Release Report Form
Texas State University Round Rock Campus



**24-Hour Notice of a
Spill/Release
Report Form**

Texas Commission on Environmental Quality 24-Hour Hotline: 800-832-8224 Region 11 Office (normal business hours): 512-339-2929, 512-339-3795 (fax) National Response Center: 800-424-8802
--

Person Making Notification

Name: Phone #:

Spill Information

Date: Time: Location:

Description of Spill Substance

Quantity (estimate): Duration:

Source:

Waters Affected:
(i.e. San Marcos River, Blanco River, etc...)

Water Pollution/
Environmental
Impact
(Description of the extent of actual or potential impact)

Sensitive areas/
Natural Resources
at risk:

Responsible Person(s)

Name: Phone #:

Name: Phone #:

Contact Person

Name: Phone #:

Figure 3-2
24-Hour Notice of Spill/Release Report Form
Texas State University Round Rock Campus
(Continued)



**24-Hour Notice of a
Spill/Release
Report Form**

Description of corrective actions:	
------------------------------------	--

Anticipated Health Risks:	
---------------------------	--

Identity of any Governmental Representatives responding to spill or discharge:

Name	Organization

Other information that may be significant to the response action:

Figure 6-1
Generators Checklist
Texas State University Round Rock Campus

Zone: 0

Health Professions Building

Generator Inspection

901-001

Generator Located on East Side- 500 Gallon Diesel

	YES	NO	N/A
1. Fuel is not leaking from the fuel tank or any fuel lines / hoses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. NO debris or accumulated water from secondary containment is noted during this inspection.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. The generator stores fuel inside a secondary containment constructed to contain the fuel tank contents.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The containment is not breached (i.e. holes in sides of wall).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

Completed By: _____ Date: _____

Figure 6-2
Transformers Checklist
Texas State University Round Rock Campus

Zone: 0

Round Rock CUB

Transformer located outside Building on NE side of building

Transformers and Switches (XFR)

901-XF-001

Transformer

	YES	NO	N/A
1. There transformer is not leaking.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. The transformer is not displaying rust/ graffiti or unit deterioration.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. The transformer is not physically damage (dents, crushed metal, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Vegetation is not growing within 12 feet of door or 3 feet of sides.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

Completed By: _____ Date: _____

APPENDIX C

Chemical Storage and Spill Response Plan

Appendix C

Chemical Storage and Spill Response Plan Texas State University Round Rock Campus

I. INTRODUCTION

The purpose of this Spill Prevention Plan is to describe measures implemented by Texas State University Round Rock Campus to prevent chemical discharges from occurring, and to prepare Texas State to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the campus. This plan was prepared by the Environmental Health, Safety and Risk Management Office (EHSRM).

II. CHEMICAL STORAGE TANKS

Chemical storage tanks are located inside the Central Utilities Building on campus and contain primarily water treatment chemicals. The chemicals treat:

- Closed chill water and hot water loops
- Boiler water
- Cooling tower water
- Potable well water

Table C-1 lists the tanks on campus that store chemicals. All of the tanks have secondary containment adequate to contain the entire contents of the tank. This list will be updated at least annually to reflect changes that occur or to include new tanks found during inspections and discovery.

Inspection of these tanks and drums will occur on a periodic basis to determine:

- If the tanks or drums are intact and there is no sign of leakage
- If the dispenser lines are intact and there is no sign of leakage
- If the secondary containment is provided for the tank, drum and dispenser lines
- If the tank integrity testing or tank replacement necessary (upon damage or every ten years)
- If liquid is present in the containment
- If the spill response materials are located near the tank or drum storage areas.

Figure C-1 shows a typical chemical storage tank inspection form. Inspections will be done electronically in the field and the report will be sent with any violations to the responsible party immediately.

III. CHEMICAL SERVICE AREAS

Chemical service areas are locations on campus where small amounts of chemicals may be used to maintain equipment periodically. These locations may also have one or more floor drains to the sanitary sewer. For example, mechanical rooms may have chemicals such as heat exchanger cleaner (acid) and small 5-gallon containers of water treatment chemical. Waste chemicals may also be present.

Inspection of these areas will occur on a periodic basis to determine:

- If chemical containers or waste containers are present
- If there is more than one of each type of container present (more than one is considered too many).
- If the secondary containment is provided for the containers
- If incompatible chemicals are separated in separate containment (i.e. organic chemicals and acids or bases will not be mixed)
- If the containers are in good condition
- If the containers have a lid and it is in place
- If the spill response materials are located in the area.

IV. SPILL RESPONSE

The main method of avoiding spill response is ***spill prevention***. Good chemical handling practices, periodic inspections and having secondary containment is key to preventing spills.

If a spill occurs, the level of response and reporting is determined by the type of spill that occurs. Texas State defines spills as incidental spills and nonincidental spills.

INCIDENTAL SPILLS

- a small spill, less than 5 gallons
- of known composition
- one that does not enter a storm drain, sanitary sewer drain or cause a sheen on a surface water.
- one that does not exceed the EPA reportable quantity

Cleanup Procedures:

- wear protective gloves, safety glasses and respiratory protection if necessary
- absorb the chemical onto pads or granular absorbent
- place pads into a bag or bucket with a lid
- attach a waste tag on the container or bag and call EHSRM for pickup
- neutralize acid spills with soda ash, baking soda or lime and pick up dry material with a shovel or broom and put in a bucket with a lid and waste tag

NON-INCIDENTAL SPILLS

- spills that are larger than 5 gallons
- spills that exceed the reportable quantity (i.e. more than 25 gallons of oil onto land or more than enough to cause a sheen of oil on surface water)
- spills where the regulatory reportable quantity is exceeded (EHSRM will advise)
- spills that may enter the environment through soil, water, storm drain, floor drains

Spill Response:

- attempt to stop the source of the release, if possible, in a safe manner
- block storm drains or floor drains, if possible
- call the EHSRM office 5-3616 and 911.
- for acid spills, apply a berm of lime or soda ash to isolate the outward flow of the spill
- Texas State has a contract Emergency Response company as the primary responder and will provide spill response with the assistance of EHSRM and the City of Round Rock Fire Department.

More detailed procedures for spill response are in Sections 3, 4, and 5 of the SPCC Plan. These procedures given above will provide immediate help with a spill situation. Follow-up activities are generally required especially for non-incidentals spills. The EHSRM office will assist with all reporting and follow-up activities.

V. TANK INTEGRITY TESTING/TANK REPLACEMENT

The chemical storage tanks are primarily totes made of plastic or stainless steel. These tanks have a replacement policy by the chemical vendors of once every ten years. If visual inspections show signs of deterioration, more frequent replacement will occur.

VI. EMERGENCY RESPONSE SUPPLIES

Emergency response supplies are located at Central Utilities Building (CUB), Avery Building Nursing Building and Willow Building. These spill kits are stationed in strategic locations and near the chemical storage containers in the cub and are supplied with absorbent, waste tags and safety equipment. These emergency supply locations will be checked during the tank inspections to determine if restocking is necessary. A Spill Kit Checklist is located in **Figure C-2**.

Table C-1

Bulk Chemical Storage Tank Locations

Texas State University Round Rock Campus

Location	Product No.	Application	CAS #	Chemical Composition	%	Tank Serial #	Container Size (gallons)	Tank Type
Central Utility Bldg 901-CT-01	Memcide 550	Microbiocide	10377-60-3	Magnesium Nitrate	1.4-2.0	N/A	165	Plastic
			2682-20-4	2-Methyl-4-isothiazolin-3-one	0.35-0.45			
			26172-55-4	5-Chloro-2-Methyl-4-isothiazolin-3-one	1.1-1.135			
Central Utility Bldg 901-CT-02	TWT-2478	Cooling Tower Scale Corrosion Inhibitor	1310-58-3	Potassium Hydroxide	10.0-20.0	N/A	165	Plastic
			37971-36-1	2-phosphonbutane-1,2,4-tricarboxylic acid	5.0-10.0			
			2809-21-4	1-Hydroxyethylidene 1,1-diphosphonic acid	2.0-5.0			
Central Utility Bldg 901-CT-03	Wrico UN1830	Sulfuric Acid	7664-93-9	Sulfuric Acid 93%	93	N/A	150	Plastic
Central Utility Bldg 901-CT-04	Wricochlor Max	Sanitizer Disinfectant	7681-52-9	Sodium Hypochlorite	12.5-15.6	N/A	150	Plastic
			7647-14-5	Sodium Chloride	9.0-10.0			
			1310-73-2	Sodium Hydroxide	0.5-2.0			
Central Utility Bldg 901-CT-05	TWT-2258	Water Treatment	Proprietary	Substituted Aromatic Amine	1.0-5.0	N/A	120	Plastic
			1310-73-2	Sodium Hydroxide	2.0-10.0			
			64665-57-2	Sodium Tolytriazole	1.0-3.0			
Added After SPCC Issuance (4/06/21):								

Figure C-1
Bulk Chemical Tank Checklist
Texas State University Round Rock Campus

Zone: 2

817 Cogeneration Power Chiller
Bulk Chemical Tanks (CT)

817-CT-03
817 CoGen Oxygen Scavenger 110 gallon Plastic tank

	YES	NO	N/A
1. Is there evidence of leakage or spillage around the tanks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of leakage or deterioration on the piping/tubing connections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is there evidence of settlement, cracking, or pitting of the tanks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Is there liquid in the secondary containment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Is the piping/tubing used to transfer chemicals is double walled?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is access to the chemical tank restricted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Is adequate spill containment available near the tank?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS _____

Completed By: _____ Date: _____

Environmental Health, Safety
and Risk Management

Page 1 of 1

Figure C-2
Spill Kit Checklist
Texas State University Round Rock Campus

Zone: 0

Round Rock CUB Spill Kit

Kit located inside building on NE corner

Spill Kit (SPK)

901-SPK-001

Spill Kit

	YES	NO	N/A
1. There is one pair of splash goggles (OSHA) within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. There are 25 sorbent pads (gray) within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. There is 1 baking soda box within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. There are two pair of heavy-duty industrial gloves within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. There are two heavy duty trash bags for waste within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. There are two waste labels for identifying the contents of the waste within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. There are two mini booms (sorbent) within yellow overpack drum.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: _____

Completed By: _____

Date: _____

PCL XL error

Warning: IllegalMediaSize