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FACILITY INFORMATION

TOPIC	INFORMATION
Facility Name	State University of New York at Fredonia
Mailing Address	155 McGinnies Hall 280 Central Avenue Fredonia, NY 14063
Facility Contact	Anne Podolak, Director of Environmental Health & Safety
Phone Numbers	Office - (716) 673-3796 Cell - (607) 346-2443
County	Chautauqua
Latitude	N 42° 27'
Longitude	W 79° 20'
Facility Operations	Undergraduate and graduate liberal arts college
Owner / Operator	New York State
Date of Last Update	July 2010

REGULATORY REQUIREMENT CROSS REFERENCE TABLE

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Oil Spill Prevention Control and Countermeasure Plan	**40 C.F.R. Part 112**
Professional Engineer Certification § 112.3(d)	Section 1.12
Maintenance and availability of complete plan § 112.3(e)	Sections 1.8 and 1.10
Amendments and plan review every 5 years § 112.5	Sections 1.8 and Section 1.9
Qualified facility requirements § 112.6	Not Applicable
Discussion of facility's conformance with 40 C.F.R. Part 112 § 112.7(a)(1)	Section 1.4
Description of physical layout of the facility § 112.7(a)(3)	Section 1.1
Facility Diagram § 112.7(a)(3)	Figure 3-1 and 3-2
Type of oil in each container and its storage capacity § 112.7(a)(3)(i)	Tables 3-4 and 3-5
Discharge prevention measures (including procedures for routine handling of products) § 112.7(a)(3)(ii)	Chapters 3 and 4
Discharge/drainage controls around containers/structures § 112.7(a)(3)(iii)	Chapter 3
Procedures for the control of a discharge § 112.7(a)(3)(iii)	Sections 6.4 and 13.1, Figure 13-1
Countermeasures for discharge discovery, response, and cleanup (including facility and contractor capability) § 112.7(a)(3)(iv)	Chapters 5 and 9, Sections 6.4, 10.1.4 and 13.1, Figure 13-1
Methods of disposal of recovered materials in accordance with applicable legal requirements § 112.7(a)(3)(v)	Section 18.2.4

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Oil Spill Prevention Control and Countermeasure Plan [continued]	**40 C.F.R. Part 112**
Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with who the facility has response agreements, and all appropriate Federal, State, and local agencies who much be contacted in case of a discharge. § 112.7(a)(3)(vi)	Table 9-1, Table 10-1, Chapter 17
Information and procedures to enable a person to report a discharge as described in 40 C.F.R. § 112.7(a)(4)	Section 17.6
Prediction of direction, rate of flow and total quantity of oil as a result of each type of major equipment failure. § 112.7(b)	Chapter 3; Tables 3-4 and 3-5
Appropriate containment and/or diversionary structures. § 112.7(c)	Chapter 3; Tables 3-4 and 3-5
Demonstration of impracticability of secondary containment § 112.7 (d)	Not Applicable
Inspections, Test, and Records	**40 C.F.R. § 112.7(e)**
Inspections and tests performed in accordance with written procedures. Written procedures and records of inspections and tests signed and kept with Plan for at least three years.	Section 4.1
Personnel Training and Discharge Prevention Procedures	**40 C.F.R. § 112.7(f)**
(1) Oil-handling personnel trained in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan.	Section 7.4
(2) Designated person responsible for spill prevention.	Sections 1.2
(3) Schedule and conduct spill prevention briefings for oil-handling personnel at least once each year.	Section 7.4.1

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Security	**40 C.F.R. § 112.7(g)**
(1) Each handling, processing or oil storage facility fully fenced entrance gates are locked and/or guarded when the facility is unattended.	Sections 15.1 and 15.3
(2) Flow and drain valves that directly discharge out are locked in closed position when not operational.	Section 15.3
(3) Oil pump starter controls locked in "off" position or only accessible to authorized personnel when not in use.	Section 15.3
(4) Pipeline loading/unloading connections capped when not in service.	Section 15.3
(5) Adequate facility lighting to discover spills and prevent vandalism.	Section 15.1
Facility Tank Car and Tank Truck Loading/Unloading Rack	**40 C.F.R. § 112.7(h)**
(1) Quick drainage systems used in areas without catch basins or treatment facility designed to handle discharges; containment designed to hold at least the maximum capacity of a single compartment of a tank car or tank truck loaded or unloaded at the facility.	Not Applicable
(2) Warning lights, physical barriers, or other measures provided to prevent truck departure prior to line disconnection.	Section 3.9
(3) Inspection of drains and outlets prior to filling and departure of tank cars and trucks.	Section 3.9
Brittle Fracture Evaluation	**40 C.F.R. § 112.7(i)**
Field-constructed aboveground containers that have undergone repair, alteration, reconstruction, a change in service, or have discharged oil have been evaluated for risk of discharge or failure due to brittle fracture.	Not Applicable
Conformance with Applicable State Rules	**40 C.F.R. § 112.7(j)**
Discussion of conformance with applicable requirements of any applicable more stringent State rules, regulations or guidelines.	Section 1.4, Chapters 4 and 17
Qualified Operational Equipment	**40 C.F.R. § 112.7(k)**
Requirements for qualified oil-filled operational equipment	Not Applicable

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Facility Drainage	**40 C.F.R. §§ 112.8(b) and 112.12(b)**
(1) Restrain diked drainage areas by valves.	Not Applicable
(2) Use of manual open-and-closed drain valves to drain diked areas.	Not Applicable
(3) Drainage of undiked areas into ponds, lagoons and catch basins to retain oil spills.	Not Applicable
(4) Design of in-plant ditches with diversion systems to return spilled oil to facility.	Not Applicable
(5) Engineer facility drainage systems to prevent discharges in case of equipment failure or human error.	Not Applicable
Bulk Storage Containers	**40 C.F.R. §§ 112.8(c) and 112.12(c)**
(1) Container materials and construction compatible with products stored and conditions of storage.	Chapter 3
(2) Adequate and impervious secondary containment for tanks.	Chapter 3, Table 3-4
(3) Requirements for drainage of diked rainwater bypassing treatment system (valve normally closed, valve opened only during drainage, inspect rainwater, records kept).	Not Applicable
(4) Cathodic protection and regular leak testing for new buried metallic tanks.	Not Applicable
(5) Partially buried metallic tanks	Not Applicable
(6) Integrity test aboveground containers on a regular schedule and when material repairs are done.	Chapter 4
(7) Internal heating coils monitored or treated to prevent leakage.	Not Applicable
(8) Containers are engineered or updated in accordance with good engineering practices to avoid discharges: high level alarms, high level pump cutoffs, direct signal communication between the container gauger and the pumping station; fast response system for determining the liquid level of each container; regular testing of devices.	Chapters 3 and 4
(9) Plant effluent disposal facilities monitored regularly to detect system upsets.	Not Applicable
(10) Prompt correction of visible leaks; prompt removal of oil accumulated in diked areas.	Section 3.3
(11) Portable tanks are positioned or located to prevent a discharge and have been provided with adequate secondary containment.	Section 3.3.6, Table 3-4

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Transfer Operations	**40 C.F.R. §§ 112.8(d) and 112.12(d)**
(1) Cathodic protective coating for buried piping, exposed pipes inspected for corrosion.	Chapters 3 and 4
(2) Terminal connections on out of service piping capped and marked as to origin.	Not Applicable
(3) Pipe supports properly designed.	Section 3.6
(4) Aboveground valves and piping inspected regularly, integrity and leak testing conducted for buried piping.	Chapter 4
(5) Aboveground piping protected by notifying vehicular traffic entering facility.	Not Applicable
OSHA Emergency Response Plan	**29 C.F.R. § 1910.120(q)**
Pre-emergency planning and coordination with outside parties 1910.120(q)(2)(i)	Chapter 10
Personnel roles, lines of authority 1910.120(q)(2)(ii)	Chapter 9
Training 1910.120(q)(2)(ii)	Chapter 7
Communication 1910.120(q)(2)(ii)	Chapter 5
Emergency recognition and prevention 1910.120(q)(2)(iii)	Chapters 4 and 11
Evacuation routes, safe distances and places of refuge 1910.120(q)(2)(iv) & (vi)	Chapter 14
Site Security and Control 1910.120(q)(2)(v)	Chapter 15
Decontamination 1910.120(q)(2)(vii)	Chapter 16
Medical treatment and first aid 1910.120(q)(2)(viii)	Chapters 6 and 11
Emergency alerting and response procedures 1910.120(q)(2)(ix)	Chapters 5, 12 and 13
Critique of response and follow-up 1910.120(q)(x)	Chapters 16
Personal protective equipment and emergency equipment 1910.120(q)(2)(xi)	Chapter 6
Emergency response procedures 1910.120(q)(3)	Chapter 13
OSHA Hazard Communication Plan	**29 C.F.R. § 1910.1200**
Employee information and training 1200(h)	Chapter 7 and 19
Hazardous chemical listing 1200(e)(i)	Chapter 19.4
Material Safety Data Sheets 1200(g)	Chapter 19.5
Labels, labeling, and warnings 1200(f)	Chapter 19.6

APPLICABLE REGULATORY REQUIREMENTS	CHAPTER OF INTEGRATED CONTINGENCY PLAN
Hazardous Waste Contingency Plan	**6 NYCRR § 373-3.4**
Promulgation statement 373-3.4(b)	Chapter 1
Arrangements with outside emergency response entities 373-3.3(g) & 373-3.4(c)	Chapter 10
Emergency coordinators 373-3.4(c)(4) & 373-3.4(f)	Chapter 9
Emergency equipment 373-3.3(c) & 373-3.4(c)(5)	Chapter 6
Evacuation plan 373-3.4(c)(6)	Chapter 14
Amendments 373-3.3(e)	Chapter 1
Emergency response procedures 373-3.4(g)	Chapter 13
Release reporting 373-3.4(g)(4), (9) &(10)	Chapters 11 and 17
Training 373-3.2(g)	Chapter 7
Alarms 373-3.3(c)-(e) & 373-3.4(c)(5)	Chapter 5

RECORD OF CHANGES

DATE	DESCRIPTION OF CHANGE (S)	PAGE NO. / SECTION
Nov. 21, 2003	Updated Regulatory Requirement Cross Reference Table	ix
	Updated Oil SPCC Compliance Inspection Plan Review	1-6
	Updated Engineer's Certification Language	1-8
	Updated Table 3-4 Bulk Oil Storage Containers	3-12
	Added Figures 3-1 and 3-2	3-16 and 3-18
	Updated Section 4.1 Storage Tank Inspection and Testing Procedures	4-1 through 4-3
	Updated Section 7.4 Oil SPCC Training	7-3
	Updated Section 15.1 Routine Security Measures	15-1
	Updated Section 17.6 Oil Spills	17-4 through 17-5
	Added Appendices F, G, and H	Appendices
July 2010	Updated Regulatory Cross Reference Table – SPCC section	Regulatory Cross Reference Table
	Updated Table 9-1 – Emergency Contacts	Table 9-1
	Reorganize Chapter 1	Chapter 1
	Remove former Appendices B (SUNY Fredonia EHS Procedure) and C (Emergency Response Quick Reference Flip Chart)	Former Appendices B and C
	Revised Oil SPCC review section	Section 1.9
	Removed references to a Central Heating Plant and removed tanks	Throughout Plan
	Updated the oil storage inventory and added detailed description of remaining tank systems	Chapter 3
	Revised Facility Diagrams	Figures 3-1 and 3-2
	Updated Incident Report	Figure 12-1
	Updated outside emergency response organization	Figure 10-1
	Revised NRC, PBS and DOT release reporting	Sections 17.6.1.1 and 17-7
	Revised tank and container inspection and testing requirements	Chapter 4
	Updated Oil SPCC training section	Section 7.4
	Added information on Oil SPCC Coordinator and Alternate roles	Sections 9.5.7 and 9.5.8
	Added general oil spill response procedures	Figure 13-1
	Added section on security for oil storage facilities	Section 15.3

DATE	DESCRIPTION OF CHANGE (S)	PAGE NO. / SECTION
July 2010 [continued]	Updated Figure 6-2: Fire Dept Connection locations	Figure 6-2
	Updated Figures 5-1 and 6-1	Figures 5-1 and 6-1
	Changed all references to "Maintenance & Operations" and "M & O" to "Services"	Throughout Plan
	Revised University Police phone extension	Throughout Plan
	Minor edits and corrections	Throughout Plan

1. PLAN OVERVIEW

1.1 FACILITY DESCRIPTION

The State University of New York College at Fredonia (SUNY Fredonia) is an undergraduate and graduate liberal arts college located in Fredonia, New York (see Figure 1-1). Approximately 5,700 students are enrolled at SUNY Fredonia. The 256-acre campus has approximately 32 buildings that are organized around Symphony Circle and Ring Road. The college is located approximately 1 mile south of Lake Erie in a residential area of Fredonia. The property boundary to the north abuts the City of Dunkirk and Town of Dunkirk. The campus topography is generally level. Storm water from roof drains and parking lots on the campus flows into the municipal storm sewer system. Potable water is supplied by the Fredonia municipal water department and wastewater is discharged to the Fredonia municipal wastewater treatment plant (WWTP).

The facilities at SUNY Fredonia include: administrative and academic buildings (including Houghton Hall and Jewett Hall each with research and teaching laboratories); a music hall; an arts center with painting, pottery, printmaking, and photography studios; a library; a gymnasium with a swimming pool and an ice rink; several athletic fields; a student health center; and two dining halls. Students are housed in 14 dormitories on the main campus. SUNY Fredonia also has a motor pool and several buildings and grounds maintenance shops all located in the Services Complex.

The campus is heated by several satellite boilers fueled by natural gas. Several buildings on campus have emergency power generators. The motor pool operates a 2,500-gallon gasoline underground storage tank (UST) and a 1,000-gallon diesel UST. In addition to the heating plant and the motor pool, the SUNY Fredonia Facilities Services Department operates ten separate trades shops that handle, store and use hazardous materials. Most of the environmental and safety issues at the campus are related to: 1) college operations and maintenance by the Facilities Services Department; and 2) chemical use and waste generation in the research and teaching laboratories.

1.2 OWNERSHIP INFORMATION AND COLLEGE CONTACT

SUNY Fredonia is owned by the State of New York. The Director of Environmental Health & Safety (EHS) is the primary employee responsible for SUNY Fredonia's safety and emergency response programs. The EHS Director is also responsible for SUNY Fredonia's oil spill prevention program. The EHS Director's offices are located at 155 McGinnies Hall. Contact information for the EHS Director and other SUNY Fredonia personnel involved in emergency preparedness and response is located in Table 9-1.

1.3 PURPOSE OF THIS PLAN

This plan describes how SUNY Fredonia handles emergencies associated with fires, injuries, and releases and spills of hazardous chemicals, hazardous and extremely hazardous substances, hazardous wastes, and petroleum products (collectively referred to as "hazardous material"). Specifically, it describes:

1. The steps SUNY Fredonia takes to prevent hazardous material "emergency incidents";
2. The emergency response actions SUNY Fredonia employs to minimize or eliminate injuries to human health and the environment resulting from "emergency and non-emergency incidents" (defined in Chapter 11);

3. The remedial and corrective actions SUNY Fredonia implements after a hazardous material "emergency incident" to reduce or eliminate the possibility of such incidents reoccurring in the future; and
4. How SUNY Fredonia complies with a number of state and federal environmental and employee safety laws and rules.

1.4 LAWS AND REGULATIONS SATISFIED BY THIS INTEGRATED CONTINGENCY PLAN

Because SUNY Fredonia: (1) stores oil in bulk in aboveground and underground tanks; (2) uses hazardous chemicals; (3) allows designated, trained employees to respond to some hazardous material emergency incidents; and (4) generates hazardous waste, it must comply with several different state and federal environmental planning laws and regulations. These legal requirements are identified below.

The U.S. Environmental Protection Agency (EPA) has promulgated regulations which require SUNY Fredonia to adopt an Oil Spill Prevention, Control and Countermeasure Plan (Oil SPCC Plan) because it stores oil in aboveground storage tanks and drums with total capacity exceeding 1,320 gallons. 40 C.F.R. § 112.1(d). This Plan is designed to comply with all of the applicable Oil SPCC planning provisions of 40 C.F.R. Part 112. Additionally, because SUNY Fredonia's combined underground and aboveground oil storage capacity exceeds 1,100 gallons, certain inventory, monitoring and inspection provisions of the New York State Bulk Petroleum Storage (BPS) regulations apply. 6 NYCRR Parts 612 - 614.

The federal Occupational Safety and Health Administration (OSHA)[1] has promulgated regulations which require SUNY Fredonia to adopt a Hazard Communication Plan because the college has employees which may be exposed to hazardous chemicals under normal conditions of use or in a foreseeable emergency. 29 C.F.R. § 1910.1200(b)(2). In addition to the federal Hazard Communication Standard, SUNY Fredonia's public sector employees are covered by the New York State "Right-to-Know" law. Toxics Substance Information Training and Education Act 12 NYCRR Part 820.

OSHA also has issued regulations which require SUNY Fredonia to adopt an Emergency Response Plan because the college allows designated and trained personnel to assist in "emergency response" activities. 29 C.F.R. § 1910.120(q)(1).

SUNY Fredonia is a large quantity generator of hazardous waste and maintains several satellite accumulation areas, and accordingly, is required by New York State Department of Environmental Conservation (NYSDEC) regulations to comply with the applicable hazardous waste management rules. 6 NYCRR § 372.2.

Because many of the laws cited above require the adoption of plans that contain similar requirements, and federal agencies have identified the one-plan approach as the "federally preferred method" for satisfying emergency response planning obligations, this Integrated Contingency Plan (ICP) has been adopted to cover all of the requirements cited above. 61 Fed. Reg. 28642, June 5, 1996.

[1] New York public sector workers are not under OSHA jurisdiction per se. Rather, in New York State, state and local government workers are under the jurisdiction of the Public Employee Safety and Health (PESH) bureau of the New York State Department of Labor. PESA operates under the authority of Sections 27 to 32 of the New York Labor Law, which has directed the Commissioner of the New York Department of Labor to adopt by rule all safety and health standards promulgated under the U.S. Occupational Safety and Health Act of 1970. New York State Labor Law, Article 2, Section 27-a.4.a. Accordingly, federal OSHA standards are applicable to SUNY Fredonia employees as incorporated by reference under New York law and enforced by PESH.

Each Chapter of this ICP identifies the federal and state laws and regulations it satisfies. A Regulatory Requirements Cross Reference Table, appearing prior to Chapter 1, identifies applicable regulatory requirements and the ICP Chapter(s) that satisfies them.

1.5 COLLEGE AREAS COVERED BY THIS INTEGRATED CONTINGENCY PLAN

As described above, SUNY Fredonia campus encompasses a 256-acre area with approximately 32 buildings. See Figure 1-2. This ICP covers the entire campus and all SUNY Fredonia operations on the campus.

1.6 PROMULGATION STATEMENT/ADMINISTRATION APPROVAL

SUNY Fredonia is committed to conducting its operations in a safe and environmentally responsible manner. All faculty, staff and students are expected to promote and foster a safe work environment as set forth in the SUNY Fredonia Environmental Health and Safety Management Procedure dated April 20, 2000. Precautionary measures, including the adoption of this ICP, have been taken to minimize the potential occurrence of incidents which could result in emergencies.

The SUNY Fredonia campus is maintained and operated to minimize the possibility of an explosion and any unplanned, sudden, or non-sudden release of hazardous material to air, soil, surface water or groundwater. This ICP is also designed to minimize hazards to human health and the environment potentially caused by fires, explosions, bomb threats, and any unplanned release of hazardous material to air, soil, surface water or groundwater at or from SUNY Fredonia. See 6 NYCRR §§ 373-3.3(b) and 373-3.4(b).

The provisions of this ICP will be carried out immediately whenever there is a fire, explosion, or release or spill of hazardous material at or from SUNY Fredonia, or a medical emergency which could threaten human health or the environment. See 6 NYCRR § 373-3.4(b)(2).

This ICP contains guidelines to assist operating, maintenance and emergency response personnel in determining specific courses of action and responsibilities under foreseeable hazardous material events, fires, and medical emergencies. Appropriate emergency response by all involved include:

1. Prompt response to injuries to human health and the environment;
2. Minimization of property damage and threats to the community; and
3. The prompt and safe resumption of college operations.

This SPCC provisions of this Plan will be implemented as herein described. SUNY Fredonia has reviewed and understands the contents of this Oil SPCC Plan. SUNY Fredonia will commit the resources necessary to fully implement the Plan. This commitment includes providing the manpower, equipment, and materials required to expeditiously control and remove any harmful quantity of oil discharged. SUNY Fredonia Administration fully supports the adoption and implementation of this Plan.

Signature: Anne M Podolak

Name: Anne Podolak

Title: Director, Environmental Health & Safety

1.7 SUBMISSION OF THE PLAN

A copy of this ICP was mailed to the entities listed below. See 6 NYCRR § 373-3.4(d)(2).

Chautauqua County Hazardous Materials Team
Chautauqua County Dept. of Health
1170 Central Ave.
D&F Plaza
Dunkirk, NY 14048

Fredonia Fire Department
80 West Main Street
Fredonia, NY 14063

Chautauqua County Sheriff's Department
Gerace Office Building
3 North Erie Street
Mayville, New York 14757-1007

Dunkirk Fire Department
311 Eagle Street
Dunkirk, NY 14048

Brooks Memorial Hospital
529 Central Avenue
Dunkirk, NY 14048

Fredonia Police Department
Central Avenue
Fredonia, NY 14063

Chautauqua County Local Emergency Planning Committee
Gerace Office Building
3 North Erie Street
Mayville, New York 14757-1007

1.8 AMENDMENT OF THE PLAN

This ICP is intended to be an integral part of SUNY Fredonia's operations. To increase its effectiveness, it will be reviewed and amended by SUNY Fredonia personnel and management whenever:

1. It fails in an emergency;
2. SUNY Fredonia changes in its operations or maintenance in a manner likely to impact the Plan's effectiveness;
3. Some other circumstance significantly increases the potential for fires, explosions, or releases of hazardous materials or changes the response necessary in an emergency;
4. Annual exercises, or drills suggest amendment is necessary;
5. The emergency coordinators change or emergency equipment list changes significantly; or
6. An environmental regulator with jurisdiction over SUNY Fredonia deems a change to be necessary.

See 6 NYCRR § 373-3.4(e).

In addition, it is SUNY Fredonia policy for the EHS Director to review and evaluate this ICP annually from the date of its original adoption. If a review suggests this ICP should be amended, it will be as soon as practicable, but always within six months. Whenever this ICP is amended, all Plan recipients will be

provided with the changes to insert into their controlled copies and the changes are recorded on the "Record of Changes" sheet at the front of this ICP.

1.9 OIL SPCC COMPLIANCE INSPECTION PLAN REVIEW

In accordance with 40 CFR §112.5(a) and (b), any technical amendment to the Oil SPCC provisions of this ICP will be certified by a licensed Professional Engineer (P.E.) within six months after a change in campus design, construction, operation, or maintenance occurs which materially affects the campus' potential for discharging oil into or upon the navigable waters of the United States or adjoining shorelines. In addition, a complete review and evaluation of the Oil SPCC provisions of this ICP will be conducted at least once every five years. The review and evaluation will be documented and SUNY Fredonia will sign the statement below as to whether the Plan will or will not be amended. If warranted based on the review and evaluation, SUNY Fredonia will amend the Oil SPCC provisions within six months of the review to include more effective prevention and control technology if such technology: (1) significantly reduces the likelihood of a spill event from the campus; and (2) has been field-proven at the time of review. SUNY Fredonia will implement such amendments within six months of the preparation of any amendments to the Oil SPCC provisions of this ICP.

Initial Date: July 2010

Review Dates **Reviewed By:**

"I have completed a review and evaluation of the Oil SPCC portions of SUNY Fredonia's ICP on [date] and [will/will not] amend the Plan as a result."

1. _____ _____

"I have completed a review and evaluation of the Oil SPCC portions of SUNY Fredonia's ICP on [date] and [will/will not] amend the Plan as a result."

2. _____ _____

"I have completed a review and evaluation of the Oil SPCC portions of SUNY Fredonia's ICP on [date] and [will/will not] amend the Plan as a result."

3. _____ _____

"I have completed a review and evaluation of the Oil SPCC portions of SUNY Fredonia's ICP on [date] and [will/will not] amend the Plan as a result."

4. _____ _____

1.10 INTERNAL ICP COPIES

Controlled copies of this ICP are kept in the following locations at SUNY Fredonia:

1. EHS Director's Office (155 McGinnies Hall)
2. Facilities Services Office (Services Complex)
3. University Police Chief's Office (Gregory Hall)
4. Office of the Vice President for Administration (501 Maytum Hall)
5. Office of the President (138 Fenton Hall)
6. University Services Office (302 Maytum Hall)

When amendments are necessary, copies of the amendments will be included in all campus copies and sent to all outside plan recipients listed in Section 1.7 above.

1.11 SUBSTANTIAL HARM CRITERIA

In accordance with 40 C.F.R.§ 112.20, SUNY Fredonia is required to determine whether its facility is subject to the Facility Response Plan requirements and associated appendices if it is a high-risk facility that poses a threat of *substantial harm* to the environment. SUNY Fredonia does not meet the substantial harm criteria and is therefore not required to prepare and submit a Facility Response Plan to the EPA. An Applicability of the Substantial Harm Criteria Checklist is included in Appendix B.

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: Anne M. Podolak

Name: Anne Podolak

Title: Director, Environmental Health & Safety

1.12 ENGINEER'S CERTIFICATION

I hereby certify that I am familiar with the requirements of 40 C.F.R. Part 112 and this Oil SPCC Plan.

By means of this certification I attest that:

1. I am familiar with the requirements of the Oil Pollution Prevention regulation (40 C.F.R. Part 112);
2. My agent has visited and examined the facility;
3. This Oil SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the provisions of 40 C.F.R. Part 112;
4. Procedures for inspections and testing have been established; and
5. This Oil SPCC Plan is adequate for the facility.

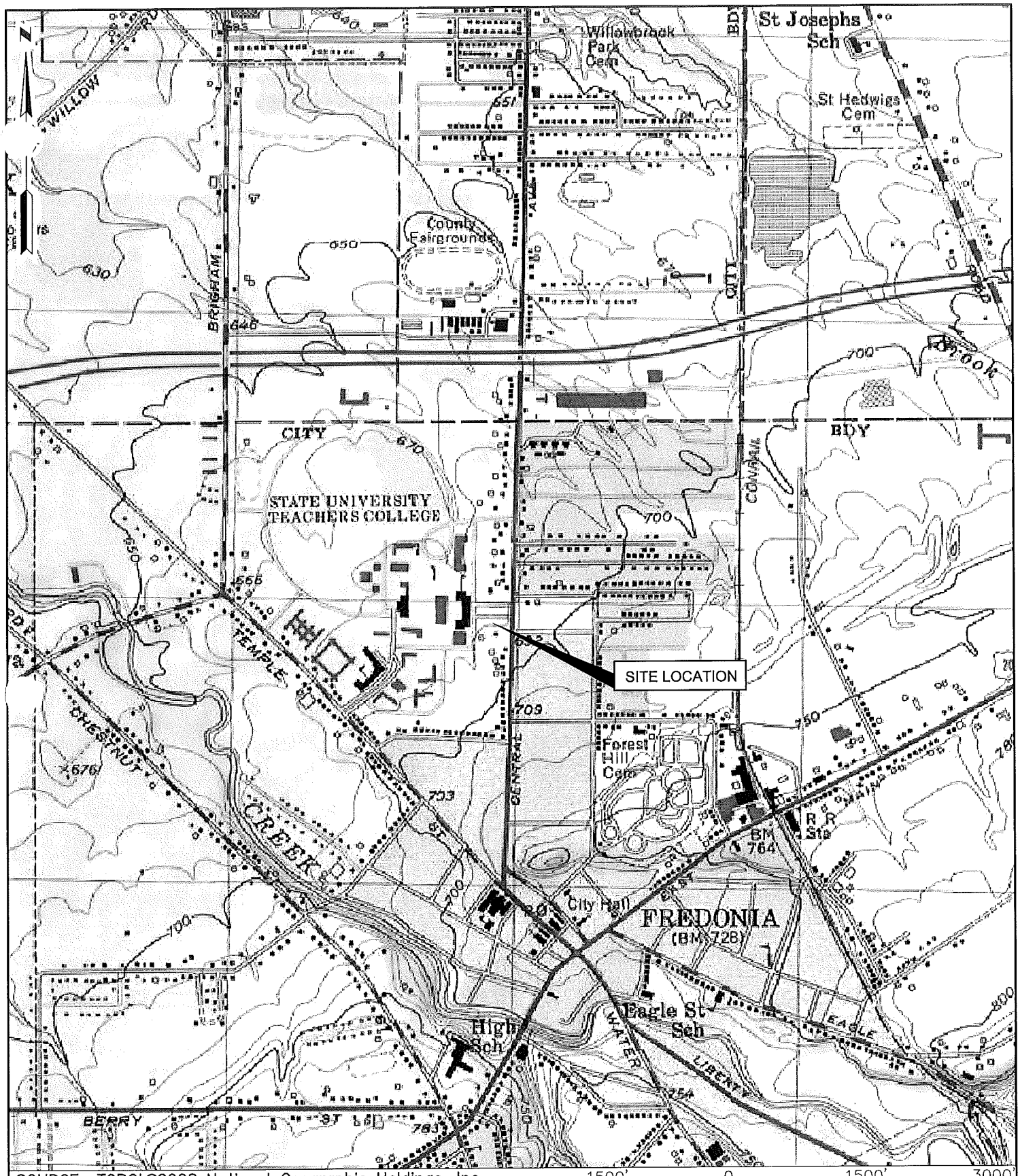
Gilbert S. Ryan

Gilbert Ryan, P.E. (Seal and Signature)

7-15-10

Date

Registration No: 087655
State: New York



SOURCE: TOPO!©2008 National Geographic Holdings, Inc.

1500' 0 1500' 3000'

APPROXIMATE BAR SCALE
1" = 1500'
CHECK GRAPHIC SCALE BEFORE USING

WOODARD &CURRAN
41 HUTCHINS DRIVE
PORTLAND, MAINE 04102
800.426.4262 | www.woodardcurran.com
COMMITMENT & INTEGRITY DRIVE RESULTS

SITE LOCATION MAP

DESIGNED BY:
DRAWN BY: PFF
CHECKED BY: BC
222631001-1.dwg

SUNY COLLEGE AT FREDONIA
280 CENTRAL AVENUE
FREDONIA, NY 14063

INTEGRATED CONTINGENCY PLAN

JOB NO: 222631.00
DATE: JULY, 2010
SCALE: AS NOTED

FIGURE 1-1

2. HAZARDOUS MATERIAL AND APPLICABLE REPORTABLE QUANTITIES

2.1 REPORTABLE QUANTITIES FOR SUNY FREDONIA'S HAZARDOUS MATERIALS

This section identifies the hazardous materials covered by this ICP (see Table 2-1) and lists applicable reportable quantities (RQs), in pounds and/or gallons (for liquids), for those materials that have RQs. SUNY Fredonia reports releases, leaks, discharges, and spills (collectively referred to as "releases") of hazardous material to the environment in a quantity equal to or exceeding an applicable RQ in any 24-hour period, as specified in 40 C.F.R. §§ 302.4, 302.5, 302.6(b)(1) and 355 Appendix A; 6 NYCRR Parts 595 and 597; or if the release spreads beyond the campus boundary.

The RQs for the hazardous material listed in Table 2-1, were determined in accordance with 40 C.F.R. §§ 302.4, 302.5, 302.6, 355 Appendix A; and 6 NYCRR Part 597. Specifically, releases of mixtures or solutions of hazardous substances are subject to the following notification requirements:

1. If the quantity of all the hazardous constituent(s) of the mixture or solution is known, notification is required where an RQ[2] of any hazardous constituent is released; or
2. If the quantity of one or more of the hazardous constituent(s) of the mixture or solution is unknown, notification is required where the total amount of the mixture or solution released exceeds the RQ for the hazardous constituent with the lowest applicable RQ.

See 40 C.F.R. § 302.6(b)(1) and § 302.5(a).

Where a product or mixture appearing on Table 2-1 contains more than one hazardous constituent, all RQs are listed, and the lowest applicable RQ is used to determine whether a release is reportable. As soon as SUNY Fredonia has knowledge that there has been a release to the environment that equals or exceeds an applicable RQ in any 24-hour period, it immediately[3] reports the release to all appropriate agencies. See 40 C.F.R. § 302.6(a), "immediate" report required; 6 NYCRR § 595.3, report required "within 2 hours" of the release; and Chapter 17. There are many hazardous materials present on-site in quantities less than applicable RQs. If any of these materials are released, they will be addressed in accordance with this ICP, but will not be reported to outside agencies unless circumstances require reporting (e.g., outside assistance or emergency treatment is needed).

In developing Table 2-1, SUNY Fredonia relied on information contained in manufacturers' material safety data sheets (MSDSs) and/or process knowledge. 29 C.F.R. § 1910.1200(d).

[2] RQs are listed in the Tables found at 40 C.F.R. § 302.4 and 40 C.F.R. Part 355 Appendix A.

[3] SUNY Fredonia defines immediately to mean within one hour of becoming aware of the exceedance, unless reporting within this time frame would compromise the response effort. If the response effort would be compromised, SUNY Fredonia will report as soon as practicable.

Table 2-1 Reportable Quantities for Hazardous Substance Releases

Product Name Hazardous Constituents	Air		Land/Water				Product Specific Gravity	Hazardous Constituents CAS #	Hazardous Constituents % of Product	Federal RQ 40 CFR §302.4 or 355 App.A, (lbs)	N.Y.S. Air RQ (lbs)	N.Y.S. RQ Land/Water	Reportable Quantity per Haz. Con. (Air) (lbs)	Reportable Quantity per Haz. Con. (Land/Water) (lbs)
	RQ for Discharge (gals)	RQ for Discharge (lbs)	RQ for Discharge (gals)	RQ for Discharge (lbs)	Flash Point °F	Product pH (As is)								
Acetone	*760*	*5,000*	*760*	*5,000*			0.789							
								67-64-1	100.00%	5,000	5,000	5,000	5,000	5,000
1-Butanol	*742*	*5,000*	*0.15*	*1*			0.808							
								71-36-3	100.0%	5,000	5,000	1	5,000	1
Carbon Tetrachloride	*1*	*10*	*0.08*	*1*			1.58							
								56-23-5	100.0%	10	10	1	10	1
Chloroform	*1*	*10*	*0.08*	*1*			1.483							
								67-66-3	100.0%	10	10	1	10	1
Cyclohexane	*154*	*1,000*	*0.15*	*1*			0.779							
								110-82-7	100.0%	1,000	1,000	1	1,000	1
Ethyl Acetate	*665*	*5,000*	*0.13*	*1*			0.902							
								141-78-6	100.0%	5,000	5,000	1	5,000	1
Ethyl Ether	*12*	*100*	*12*	*100*			1.035							
								60-29-7	100.0%	100	100	100	100	100
Hexanes	*0*	*1*	*0.18*	*1*			0.66							
								110-54-3	100.0%	5,000	1	1	1	1
Mercuric Chloride	*0*	*1*	*0.02*	*1*			5.44							
								7487-94-7	100.0%	1	1	1	1	1
Methanol	*758*	*5,000*	*0.15*	*1*			0.791							
								67-56-1	100.0%	5,000	5,000	1	5,000	1
Methylene Chloride	*90*	*1,000*	*0.09*	*1*			1.326							
								75-09-02	100.0%	1,000	1,000	1	1,000	1

Table 2-1 Reportable Quantities for Hazardous Substance Releases

Product Name Hazardous Constituents	Air		Land/Water				Product Specific Gravity	Hazardous Constituents CAS #	Hazardous Constituents % of Product	Federal RQ 40 CFR §302.4 or 355 App.A, (lbs)	N.Y.S. Air RQ (lbs)	N.Y.S. RQ Land/Water	Reportable Quantity per Haz. Con. (Air) (lbs)	Reportable Quantity per Haz. Con. (Land/Water) (lbs)
	RQ for Discharge (gals)	RQ for Discharge (lbs)	RQ for Discharge (gals)	RQ for Discharge (lbs)	Flash Point °F	Product pH (As is)								
Tetrahydrofuran	*135*	*1,000*	*13*	*100*			0.89							
								109-99-9	100.0%	1,000	1,000	100	1,000	100
Toluene	*139*	*1,000*	*0.14*	*1*			0.86							
								108-88-3	100.0%	1,000	1,000	1	1,000	1
Xylene	*139*	*1,000*	*0.14*	*1*			0.86							
								133-02-07	100.0%	1,000	1,000	1	1,000	1
Crystal Aqua	*#DIV/0!*	*667*	*#DIV/0!*	*667*										
Sodium Hypochlorite								7681-52-9	15.0%	100	100	100	667	667
Sodium Hydroxide								1310-73-2	2.0%	1,000	1,000	100	50,000	5,000

Note: All D001 (ignitible - flashpoint less than 140 °F) and D002 (corrosive - pH less than or equal to 2 or greater than or equal to 12.5) hazardous wastes will be reported whenever the spilled amount exceeds 100 lbs.

3. STORAGE, CONTAINMENT, AND DIVERSIONARY STRUCTURES

This Chapter identifies and describes the bulk (e.g., greater than 1 gallon) chemical and oil storage tanks, their design, related secondary containment structures, piping, transfer locations, and interior and exterior drainage. With regard to oil storage, this Chapter identifies the most likely causes of spills, predicted spill pathways and probable direction, estimated maximum spill quantities, rates of flow, and satisfies many of the requirements of 40 C.F.R. §§ 112.7 and 112.8.

SUNY Fredonia stores hazardous substances and oil in tanks, 55-gallon drums and smaller containers throughout the campus. Generally, these tanks and storage containers are contained in dikes and/or are located in buildings that will prevent a release from reaching the outside environment (collectively referred to as "secondary containment"). SUNY Fredonia considers a tank to have secondary containment if the dike or building it is located within is capable of holding at least 110% of the contents.

3.1 BULK CHEMICAL STORAGE

The following discussion focuses on those hazardous materials that are stored and used in bulk at SUNY Fredonia and therefore may pose the greatest potential for release. Note that SUNY Fredonia stores and uses several hazardous chemicals in lab size quantities which are not discussed.

In general, the spill potential at bulk chemical storage locations is minor. There are basic safeguards in place for prevention and containment of hazardous material spills (described in Chapter 4). A complete list of bulk hazardous chemicals present at SUNY Fredonia is provided in Table 3-1. Spill prevention measures for the bulk hazardous chemicals used at the college are described below.

3.1.1 Laboratory Chemicals

The Biology and Chemistry Departments store laboratory chemicals in bulk at the following locations: 1) the Biology Department Stockroom, Room 137 in Jewett Hall; and 2) the Chemistry Volatile Stockroom located in an underground bunker/vault adjacent to Houghton Hall. There are no laboratory chemicals stored in bulk (greater than 1 gallon) in the Chemistry Department Stockroom, Room 226 in Houghton Hall.

The Biology Department Stockroom (Room 137) is located within Jewett Hall and is designed and structured so that it will prevent a release from entering the outside environment. All chemicals in the Biology Department Stockroom, including those chemicals stored in bulk, are stored on shelves and cabinets categorized into general storage, reactive oxidizers, poisons, corrosives and flammables.

The Chemistry Volatile Stockroom is an underground bunker located adjacent to Houghton Hall where the Chemistry Department stores all its bulk chemicals. Chemicals in the bunker are stored on shelves. The floor to the bunker is constructed of concrete and contains no drains to the outside environment.

3.1.2 Services Complex Heating Services Chemicals

Boiler chemicals and other hazardous materials are stored in bulk in the boiler room and workshops at the Heating Services located in the Services Complex. Floor drains in the Heating Plant room are tied into the stormwater system that discharges to a creek that runs between the Butler Building and the Services Complex.

3.1.3 Services Complex Garage Chemicals

Hazardous materials are stored in bulk in the garage located in the Services Complex. The garage floor is sloped to drain out through the garage bay doors into the paved area within the Services Complex. The paved parking area contains stormwater drains that discharge to the creek between the Butler Building and the Services Complex.

3.1.4 Services Complex Storage Room Chemicals

Hazardous materials are stored in bulk in the Services Complex Storage room, some of which are stored on a containment platform. The remainder of the Storage room drains to a creek that runs between the Butler Building and the Services Complex.

3.1.5 Services Complex Painting Department Chemicals

The Painting Department in the Services Complex stores solvents in bulk in a flammable storage cabinet which is provided with secondary containment.

3.1.6 Art Department Chemicals

Art department hazardous chemicals are stored in bulk in:

- Printmaking - Room 231 in the Rockefeller Arts Center
- Oil Painting – Room 317 in the Rockefeller Arts Center
- Photo Lab – Igoe Hall (basement)

The solvents in Printmaking and Oil Painting rooms are stored in flammable storage lockers. The Photography Laboratory Storeroom is located within the Igoe Hall building and is structured so that it will prevent a release from entering the outside environment. This storeroom is refrigerated and was part of a cafeteria formerly located in Igoe Hall.

3.1.7 Refrigerants

R-22 (chlorodifluoromethane) is stored in the chiller room behind the ice rink in the Steele Hall Field House. R-123 (1,1-dichloro-2,2,2-trifluoroethane) is used in the chiller room in Thompson Hall basement.

3.1.8 Crystal Aqua Pool Chemical

Crystal Aqua, a pool treatment chemical with approximately 15% sodium hypochlorite and 2% sodium hydroxide, is stored in the Natatorium in two 160 gallon tanks in a room off the pool. Secondary containment for these tanks consists of an epoxy coated concrete containment dike.

3.1.9 Propylene Glycol

Propylene glycol is used in the HVAC systems in Jewett and Houghton Halls. Approximately 200 gallons of propylene glycol is stored in air handlers located on the roofs of these buildings to prevent freezing during the winter months.

3.1.10 Propane Storage Tanks

Propane is stored at SUNY Fredonia in several storage tanks identified on Table 3-2. Table 3-2 identifies these tanks, their location and purpose.

3.1.11 Compressed Gas

Compressed Gas is stored in several tanks identified on Table 3-3.

3.2 BULK OIL STORAGE

SUNY Fredonia stores diesel, No. 2 fuel oil, used oil, gasoline, and various oils in 55-gallon drums, ASTs and USTs. Each of the containers is provided with the required secondary containment. The material and construction of all oil storage containers maintained by SUNY Fredonia are compatible with the materials stored and the conditions of storage such as pressure and temperature. Additionally, oil storage containers are constructed in accordance with good engineering practices. Table 3-4 provides the following information for the ASTs and 55-gallon drum at SUNY Fredonia: Tank ID No.; Location; Total Storage Capacity (gallons); Contents; Material of Construction; Means of Secondary Containment; Year Installed; and Predicted Flow Direction of Potential Release.

3.3 ABOVEGROUND OIL STORAGE TANKS AND CONTAINERS

The rate of flow of a potential spill from any of the tanks or containers would depend on several factors (e.g., the size of the leak and liquid head above the leak) and is difficult to determine accurately until all factors associated with a specific spill are known. Because all SUNY Fredonia aboveground bulk storage containers are provided with secondary containment, a release from the primary containers would remain within the secondary containment. However, Table 3-4 does provide potential oil release pathways in the event of secondary containment failure. The maximum potential spill volumes for the aboveground tanks are equivalent to their capacities (i.e., the maximum spill quantity for a 275-gallon AST is 275 gallons). However, if an incident occurs during tank filling, the potential volume of the release is equal to the capacity of the delivery or pick up vehicle. Visible discharges which result in a loss of oil from tanks are promptly corrected and oil is removed from the secondary containment structure. The tanks are inspected and maintained on a regular basis, as described in Chapter 4.

In accordance with the DEC PBS rules, the tank design capacity, working capacity and identification number should be marked on each AST and at the product gauge and the fill port should be marked with the American Petroleum Institute (API) symbol and color code to identify the product within.

3.3.1 Tanks # 8 and # 5 – Services Complex Garage

Tank # 8 is a 250-gallon single-walled steel tank that stores used oil in the Services Complex Garage. The tank is situated within a welded steel containment structure and equipped with a product level gauge. There is no piping associated with the tank. The tank is filled through a funnel located in the fill port and the used oil is removed by a vacuum truck.

3.4 UNDERGROUND STORAGE TANKS

The 2,500-gallon gasoline UST and the 1,000-gallon diesel oil UST are located in the Services Complex adjacent to the garage and are used to fuel vehicles and equipment operated by the Facilities Services Department. Both USTs are constructed of double-walled fiberglass-reinforced plastic. All of the piping associated with the tanks is also constructed of fiberglass-reinforced plastic. Both tanks are equipped with alarmed electronic leak detection systems which provide continuous monitoring of the interstitial space for the tanks and associated underground piping. Both USTs are also equipped with liquid tight overfill spill catchment basins fitted around the fill pipes.

Because these tanks are subject to full regulation under the federal UST regulations at 40 C.F.R. Part 280, they are not subject to the Oil SPCC regulations. However, they are identified on the facility diagram in Figure 3-1, as required, and described in this ICP to provide a complete oil storage inventory.

3.5 HYDRAULIC ELEVATORS

Numerous elevators at SUNY Fredonia use hydraulic oil stored in small aboveground hydraulic reserve tanks associated with the elevator systems. The material and construction of the tanks is compatible with the material stored. Table 3-5 identifies these elevators, their locations, the storage capacities, and means of secondary containment. A release occurring in the elevator piston would be contained within the building elevator shaft.

3.6 TANK PIPING

The fill and most supply piping associated with the SUNY Fredonia ASTs are constructed of single-walled steel (black iron). There is very limited potential for an oil release from the piping as it is inspected monthly. If the piping associated with Tank # 9 (Steele Hall) were to break, approximately two gallons of oil would be released; because the piping exits the top of the tank, only the oil in the piping at the time would be released. Engine oil is dispensed from the Garage AST (Tank # 5) using an air pump and a rubber hose. If the rubber dispensing hose for Tank # 5 were to break, a minimal amount of oil would be released before the flow could be stopped as the pump rate is approximately six gallons per minute. The flow could be shut off within 30 seconds, resulting in less than three gallons of oil being released. There is a greater potential for a more significant oil release from Tanks # 15 (Jewett Hall) and # 13 (Erie Hall) because the piping exits the bottom of the tanks and floor drains are located in the rooms. If these tanks are not removed from service by November 10, 2010, the piping systems will be provided adequate containment. Table 3-4 describes where a potential release from the tanks' piping would likely flow.

It is believed that the pipe supports are provided for aboveground piping in accordance with good engineering practices. Aboveground piping is not at danger from vehicular traffic. Tank piping is shown on the site plan in Figure 3-1.

3.7 TRANSFER AREAS

The oil transfer areas (i.e., the UST and AST fill ports and 55-gallon drum storage areas) at SUNY Fredonia are maintained and operated to prevent potential releases from entering drains or surface water. Specifically, oil transfers are monitored (see Section 3.9, below) and countermeasures are immediately taken if a release is imminent or occurring. The most likely oil release scenarios would be a tank overfill or a ruptured hose on the delivery vehicle. The pathways for potential releases in transfer areas are described in Table 3-4. The potential amount of oil that could be released would be dependent on the particular circumstances; however some generalizations can be made. According to SUNY Fredonia

staff, the off-loading rate of delivery vehicles would be approximately 85 gallons per minute. It is estimated that the driver overseeing the delivery would respond by shutting off the flow from the delivery vehicle within 10 seconds. Therefore, it is expected that less than 15 gallons of oil would be released during a transfer incident.

There is also the potential for an oil release when dispensing oil from or adding used oil or kitchen oil to the 55-gallon drums. Product is dispensed from the drums via pumps attached through the drum bungs or spigots on horizontal drums. It is estimated that less than one gallon of oil would be released due to overfilling a secondary container from a 55-gallon drum or overfilling a drum containing used oil. If a drum were to tip over while its bung was not in place, it is estimated that up to three gallons up oil could be spilled before the drum was righted or the release was contained.

SUNY Fredonia does not have any oil loading/unloading racks and is therefore not subject to the requirements 40 C.F.R. § 112.7(h).

3.8 GENERAL SPILL PREVENTION STRATEGY AND TRAINING

The primary method of spill management at SUNY Fredonia is to prevent spills in the first place. Prevention of spills has been emphasized through the proper design of containment systems, the training of personnel, and regular inspections (see Chapter 4).

All new employees and all contractors go through an orientation program which includes a session on college environmental programs and spill reporting procedures. During this program, spill prevention policies are stressed. All college personnel involved with the use of oil or chemicals are trained to report oil and chemical leakage from equipment so that early corrective action can be initiated. In addition, employees are trained to contain spills they are likely to discover using appropriate methods and equipment. Containment will only be attempted when it can be done without risk. SUNY Fredonia personnel will only attempt to contain spills until emergency response personnel with specialized response training respond to the site.

3.9 OIL TRANSFERS

Personnel involved in the unloading, storage and use of oil and chemical products are trained in the proper methods to handle, contain and report spills. Tank truck unloading/loading at SUNY Fredonia consists of bulk deliveries of gasoline and diesel to the ASTs and USTs and removal of used oil. The carrier monitors all deliveries and employs practices for preventing transfer spills and accidental discharges. The following general procedures and practices are followed by SUNY Fredonia personnel and/or vendors with respect to AST filling procedures:

1. Tank filling operations are sometimes attended by SUNY Fredonia staff. If SUNY Fredonia personnel are not present during oil transfers, it is the responsibility of the carrier to monitor transfer activities. The driver, operator, or attendant of any delivery vehicle does not leave the area while the oil is being transferred.
2. Oil transfers are usually performed during daylight hours. If transfers must be performed at night, they are performed only under suitable lighting conditions.
3. Oil deliveries are performed only at designated fill pipe/port areas.
4. Prior to the transfer, the carrier determines that the receiving tank has available capacity to receive the volume of oil to be delivered by using the tank's level gauge.
5. The carrier inspects drains and outlets prior to filling and departure of the truck.

6. SUNY Fredonia personnel or the carrier monitor every aspect of the delivery and take immediate action to stop the flow of oil if the working capacity of the tank has been reached or if an equipment failure or related emergency occurs.
7. Smoking, lighting matches, or carrying any flame near the delivery truck during transfer operations is not permitted.
8. Cell phones should be turned off.
9. The delivery truck wheels are to be chocked if the vehicle is on an incline to avoid the possibility of truck movement prior to the completion of oil transfer.
10. Drip pans and/or absorbent material are available in the event of a leak or overfill.
11. Open spring loaded valves are never tied off or blocked.
12. Prior to filling and prior to departure of the delivery truck, any vehicle outlets are closed and inspected for evidence of leakage to prevent leakage of liquid while in transit.

40 C.F.R. § 112.7(h); Best Management Practice

3.9.1 Drum Loading/Unloading

The following general procedures and practices are observed by SUNY Fredonia personnel, as applicable, with respect to drum loading/unloading:

- Drum covers/bungs are secured and tightened prior to moving.
- Surrounding floor is clean and dry prior to removing drums from pallets or placing drums on pallets.
- Ramps and proper tools (i.e., dollies) are used to lift drums from on top of pallets onto ground level (or vice-versa).
- Tools that could puncture or perforate the drum are not used during drum movement.
- Supplies of oil absorbents are readily available during drum movement activities.

3.10 REQUIRED SITE IMPROVEMENTS

The following improvements/upgrades are required to bring SUNY Fredonia's oil storage facilities into compliance with applicable Oil SPCC regulations and best management practices. SUNY Fredonia will commit necessary resources and ensure that the issues are corrected by November 10, 2010. The plan will be updated to address the improvements and any technical amendments will be certified by a P.E. within six months.

1. Containment is not provided for the piping systems for Tank # 5 in Jewett Hall and Tank # 13 in Erie Hall. Open and active floor drains are located in the generator rooms. If the tanks are not closed by November 10, 2010, steps should be taken to provide adequate containment for the piping systems.

Table 3-1: Regulated Hazardous Substance List

Container Description	Qty	Chemical/Product (Hazardous Constituent)	CAS Number	Location	Total Potential Storage	Means of Secondary Containment
55-gallon Drum	1	Paint Thinner Mineral Spirits		Services Complex, Storage Room	55 gal	Inside building
55-gallon Drum	1	Kensol 30 Solvent for parts cleaner, Stoddard solvent		Services Complex, Heating Services Floor	55 gal	Inside building
55-gallon Drum	1	Duboth OX Sodium Sulfate, Water Treatment	231-821-4	Services Complex, Heating Services Floor	35 gal	Inside building
55-gallon Drum	1	Corrodine 710 Diethylaminoethanol	100-37-9	Services Complex, Heating Services Floor	55 gal	Inside building
55-gallon Drum	1	Duboth S-5 Sulfite	7757-83-7	Services Complex, Heating Services Floor	55 gal	Inside building
55-gallon Drum	1	Vaporene 8102 Sodium Hydroxide, H.T. Treatment	1310-73-2	Services Complex, Heating Services Floor	55 gal	Inside building
55-gallon Drum	2	Antifreeze Ethylene Glycol	107-21-1	Services Complex, Garage Floor	110 gal	Containment Pad
16-gallon Carboy	2	Kendall Kendote underbody and cavity protection coating, Stoddard Solvent & Petroleum Hydrocarbon		Services Complex, Garage Floor	32 gal	Containment Pad
55-gallon Drum	1	Used Antifreeze Ethylene Glycol	107-21-1	Services Complex, Garage Floor	55 gal	Containment Pad
55-gallon Drum	1	Kensol 30 Solvent for Graymills parts cleaner, Stoddard solvent		Services Complex, Garage Floor	55 gal	Containment Pad
55-gallon Drum	1	Kendall Dexron III/Mercon Transmission Fluid		Services Complex, Garage Floor	55 gal	Containment Pad

Container Description	Qty	Chemical/Product (Hazardous Constituent)	CAS Number	Location	Total Potential Storage	Means of Secondary Containment
55-gallon Drum	1	1210 Solvent		Services Complex, Painters Dept. Flammable Cabinet	55 gal	Containment Pad
Chiller	1	R-22 Refrigerant		Steele Hall Field House	7,100	Inside Chiller Room
Chiller	1	R-123 Refrigerant		Thompson Hall basement	900 lbs	Inside Chiller Room
Air handlers	1	Propylene Glygol		Jewett Hall HVAC System	100 gal	Containment Pad
Air handlers	1	Propylene Glygol		Houghton Hall HVAC System	100 gal	Containment Pad
30-gallon Drum	1	Vaporene 94	23783-26-8	Thompson	30 gal	Containment Pad
30-gallon Drum	1	Vaporene W-10		Thompson	15 gal	Containment Pad
80-gallon Drum	1	Vaporene 94	23783-26-8	Maytum	80 gal	Catch Basin
30-gallon Drum	2	Optiguard MCA-622		Maytum	42 gal	Catch Basin
30-gallon Drum	1	Optiguard MCA-622		Fenton	21 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Houghton	17 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Cranston	15 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Erie	19 gal	Containment Pad
30-gallon Drum	1	Vaporene 94	23783-26-8	Erie	25 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Williams Ctr.	17 gal	Containment Pad
30-gallon Drum	2	Vaporene 94	23783-26-8	Williams Ctr.	55 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Jewett Hall	30 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Mason	20 gal	Containment Pad
30-gallon Drum	1	Vaporene 94	23783-26-8	Mason - Tower	30 gal	Containment Pad
30-gallon Drum	1	Optiguard MCA-622		Dods	30 gal	Containment Pad

Container Description	Qty	Chemical/Product (Hazardous Constituent)	CAS Number	Location	Total Potential Storage	Means of Secondary Containment
30-gallon Drum	1	Vaporene 8310		Steele Hall	5 gal	Containment Pad
30-gallon Drum	1	Vaporene W-10		Steele Hall	30 gal	Containment Pad
30-gallon Drum	1	Vaporene 72		Steele Hall	10 gal	Containment Pad
30-gallon Drum	2	Vaporene 94	23783-26-8	Steele Hall	60 gal	Containment Pad
160-gallon Tank	2	Crystal Aqua (Sodium Hypochlorite, Sodium Hydroxide)		Natatorium	440 gal	Concrete Containment Dike

Table 3-2: Propane Tanks

Tank Description/Size (gallons)	Qty.	Substance	Location and Purpose	Total storage (gal)	Material of Construction
20-lb tank	2	Propane	Fenton Hall for floor buffers	40 lbs	Steel
20-lb tank	2	Propane	Gregory Hall for floor buffers	40 lbs	Steel
100-lb tank	2	Propane	At Outside Kiln, Rockefeller Arts Center	200 lbs	Steel
33-lb tank	2	Propane	Warehouse Loading Dock, Services Complex	66 lbs	Steel
20-lb tank	6	Propane	Outside FSA Commissary Loading Dock, Services Complex	120 lbs	Steel
500-lb tank	1	Propane	Outside Steele Hall for ice dressing machine	500 lbs	Steel
20-lb tank	1	Propane	Steele Hall for floor buffers	20 lbs	Steel
20-lb tank	3	Propane	Thompson Hall for floor buffers	60 lbs	Steel

Table 3-3: Compressed Gas Tanks

Tank Description/Size	Qty.	Substance	Location	Total storage	Material of Construction
20 lb tank	5	Carbon Dioxide	Campus Center	100 lbs	Steel
230 cu.ft.	1	Helium	Campus Center	230 cu.ft.	Steel
125 cu. ft.	varies	Acetylene	Services Complex Warehouse in Stock	varies	Steel
20 lb tank	varies	Carbon Dioxide	Services Complex Warehouse in Stock	varies	Steel
50 lb tank	varies	Carbon Dioxide	Services Complex Warehouse in Stock	varies	Steel
230 cu.ft.	varies	Nitrogen	Services Complex Warehouse in Stock	varies	Steel
40 lb tank	varies	Oxygen	Services Complex Warehouse in Stock	varies	Steel
122 cu. ft.	varies	Oxygen	Services Complex Warehouse in Stock	varies	Steel
143,383 cu.ft.	varies	Argon	Special Orders	varies	Steel
213,291 cu.ft.	varies	Helium	Special Orders	varies	Steel
197 cu.ft.	varies	Hydrogen	Special Orders	varies	Steel
125 cu.ft.	2	Oxygen	Services Complex Garage	250 cu.ft.	Steel
125 cu.ft. 132 cu.ft.	1 1	Acetylene	Services Complex Garage	125 cu.ft. 132 cu.ft.	Steel
230 cu.ft.	1	Argon	Services Complex Garage	230 cu.ft.	Steel
230 cu.ft.	2	Nitrogen	Services Complex Heating Services	460 cu. Ft.	Steel
20 cu.ft. 125 cu.ft.	1 1	Acetylene	Services Complex Heating Services	145 cu.ft.	Steel
40 cu.ft. 125 cu.ft.	1 1	Oxygen	Services Complex Heating Services	165 cu.ft.	Steel
40 cu.ft.	1	Oxygen	Electrical Shop	40 cu.ft.	Steel
20 cu.ft.	1	Acetylene	Electrical Shop	20 cu.ft.	Steel
20 cu.ft.	5	Carbon Dioxide	Services Complex Commissary	100 lbs	Steel
110 cu.ft.	1	Oxygen	Services Complex Commissary	110 cu.ft.	Steel
55 cu.ft.	1	Acetylene	Services Complex	55 cu.ft.	Steel
20 lb tank	5	Carbon Dioxide	Erie Hall	100 lbs	Steel
100 cu.ft.	1	Acetylene	Houghton Hall	100 cu.ft.	Steel
240 cu.ft.	2	Argon	Houghton Hall	480 cu.ft.	Steel

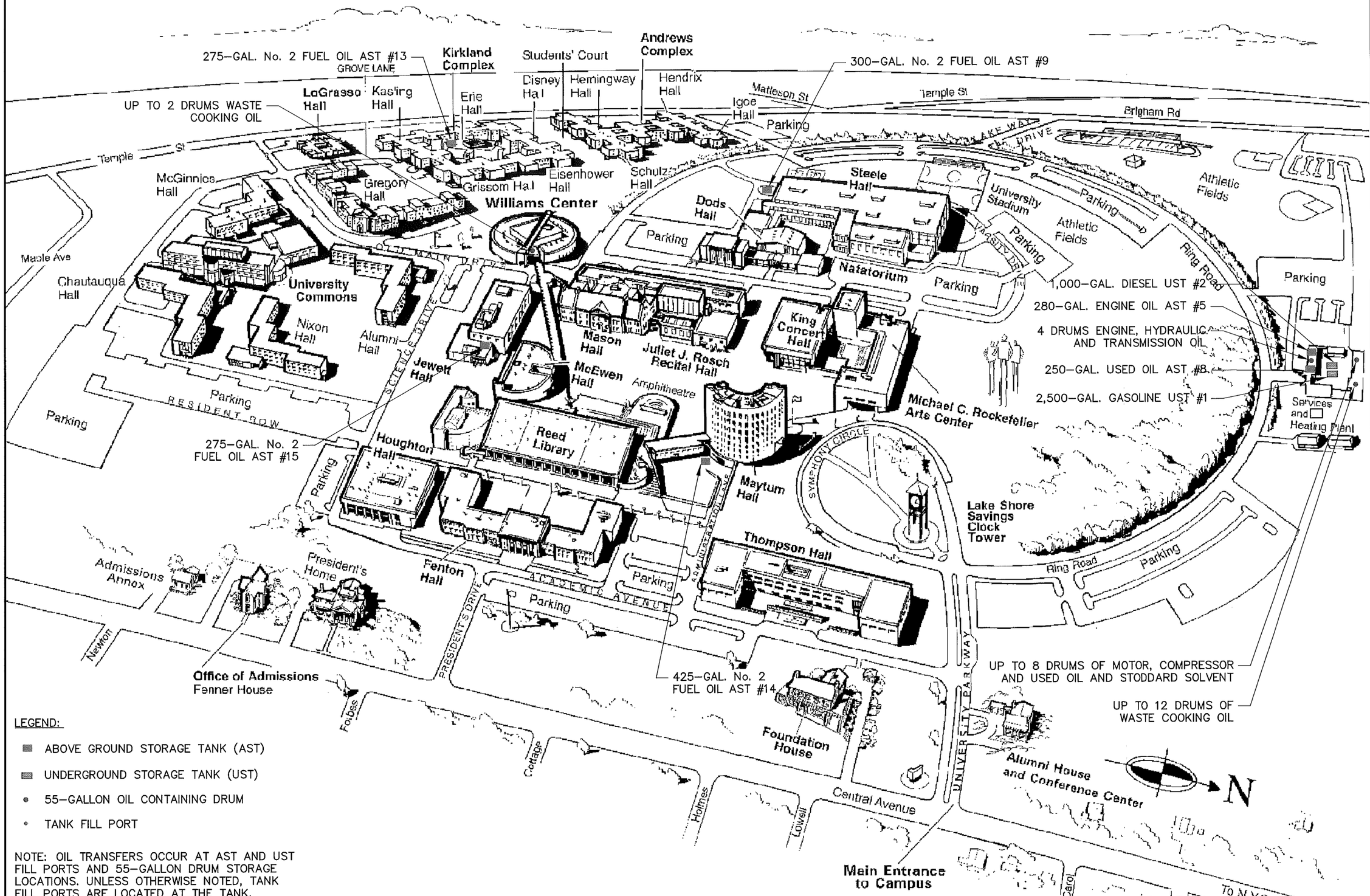
Tank Description/Size	Qty.	Substance	Location	Total storage	Material of Construction
230 cu.ft.	2	Carbon Dioxide	Houghton Hall	460 cu.ft.	Steel
230 cu.ft.	3	Helium	Houghton Hall	690 cu.ft.	Steel
230 cu.ft.	2	Hydrogen	Houghton Hall	460 cu.ft.	Steel
230 cu.ft.	4	Nitrogen	Houghton Hall	920 cu.ft.	Steel
230 cu.ft.	1	Liquid Nitrogen	Houghton Hall	230 cu.ft.	Steel
230 cu.ft.	1	Oxygen	Houghton Hall	230 cu.ft.	Steel
230 cu.ft.	2	Carbon Dioxide	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Nitrogen	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Oxygen	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Acetylene	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Helium	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Hydrogen	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Argon	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Compressed Air	Jewett	230 cu.ft.	Steel
230 cu.ft.	1	Carbon Dioxide/ Nitrogen	Jewett	230 cu.ft.	Steel
110 cu.ft.	1	Acetylene	RAC	110 cu.ft.	Steel
230 cu.ft.	1	Argon	RAC	230 cu.ft.	Steel
230 cu.ft.	1	Oxygen	RAC	230 cu.ft.	Steel

ID No.	Location	Total Storage (gallons)	Contents	Material of Construction	Means of Secondary Containment	Predicted Flow Direction of Potential Release
NA	Services Complex, Heating Services	Up to 440	Motor, Used and Compressor Oil and Stoddard Solvent	Up to (8) 55-gallon Steel Drums	Spill pallet	A spill during drum handling operations is unlikely to reach one of the floor drains in the area due to the protection provided by the containment and the small amounts dispensed.
NA	Services Complex, Garage	Up to 220	Hydraulic and Transmission Oil	Up to (4) 55-gallon Steel Drums	Spill pallet	A spill during drum handling operations is unlikely to reach one of the floor drains in the room due to the protection provided by the containment and the small amounts dispensed.
NA	Williams Center Kitchen	110	Used Cooking Oil	(2) 55-gallon Steel Drums	Spill pallet	A spill during drum handling operations is unlikely to reach one of the several floor drains in the room due to the protection provided by the containment and the small amounts added.
NA	Services Complex, Shaw Commissary	Up to 660	Used Cooking Oil	Up to (12) 55-gallon Steel Drum	Refrigerated	A release from the drums would not flow far as the drums are stored in a walk-in cooler with no floor drains and the oil would be very thick or solid.

Table 3-5: Hydraulic Elevators

ID No.	Building	Total storage (gal)	Secondary Containment
1	Eisenhower Hall	90 gal	Concrete Containment Berm
2	Erie Hall	150 gal	Concrete Containment Berm
3	Fenton Hall	150 gal	Concrete Containment Berm
4	Gregory Hall	80 gal	Concrete Containment Berm
5	Grissom Hall	90 gal	Within Building
6	Hemingway Hall	125 gal	Within Building
7	Houghton Hall	90 gal	Within Building
8	Igoe Hall	145 gal	Within Building
9	Mason Hall	90 gal	Within Building
10	McEwen Hall	345 gal	Within Building – Recessed Room
11	Reed Library (handicapped)*	12 gal	Within Building
12	Carnahan Jackson East	95 gal	Within Building – Floor Drain Plugged
13	Carnahan Jackson West	95 gal	Within Building – Floor Drain Plugged
14	Rockefeller Arts Center (King)	220 gal	Within Building
15	Rockefeller Arts Center (loading dock)	170 gal	Within Building
16	Rockefeller Arts Center (handicapped)	85 gal	Within Building
17	Rockefeller Arts Center (Marvel)	220 gal	Concrete Containment Berm
18	Steele Hall	105 gal	Within Building
19	Thompson Hall	95 gal	Within Building
20	Thompson Hall	265 gal	Within Building
21	Williams Center (service)	90 gal	Within Building
22	Williams Center (handicapped)	105 gal	Concrete Containment Berm
23	Mason Hall (Rosch)	80 gal	Within Building
24	University Commons	150 gal	Within Building
25	University Commons	150 gal	Within Building
26	University Commons	150 gal	Within Building

*Not subject to Oil SPCC regulations - < 55 gallons.



LEGEND:

- ABOVE GROUND STORAGE TANK (AST)
- UNDERGROUND STORAGE TANK (UST)
- 55–GALLON OIL CONTAINING DRUM
- TANK FILL PORT

NOTE: OIL TRANSFERS OCCUR AT AST AND UST FILL PORTS AND 55–GALLON DRUM STORAGE LOCATIONS. UNLESS OTHERWISE NOTED, TANK FILL PORTS ARE LOCATED AT THE TANK.

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COMMITMENT & INTEGRITY DRIVE RESULTS

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BULK OIL STORAGE TANKS AND CONTAINERS

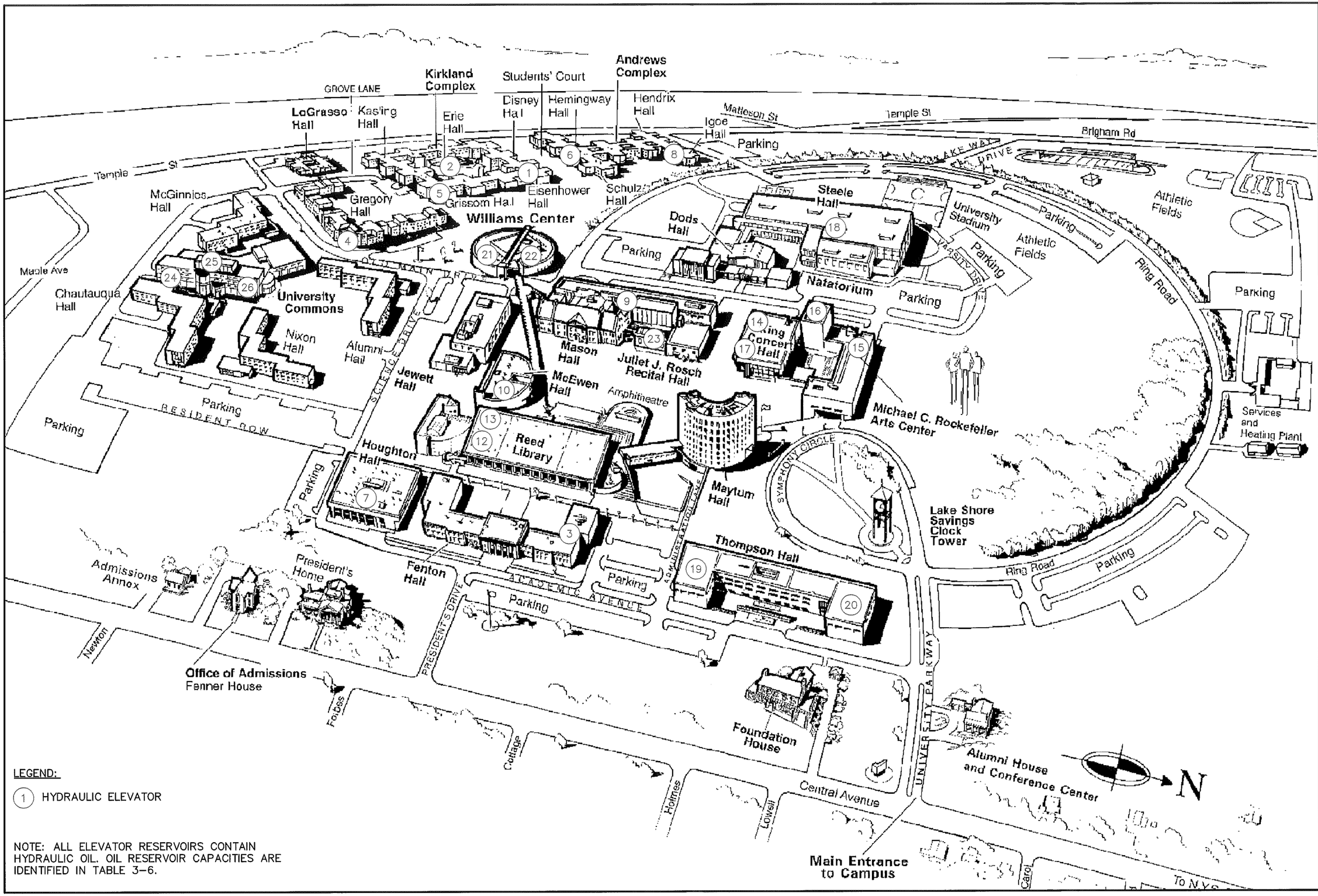
DESIGNED BY:	BC
DRAWN BY:	PFF
CHECKED BY:	JB
	222631000A.dwg

SUNY COLLEGE AT FREDONIA
280 CENTRAL AVENUE
FREDONIA, NY 14063

INTEGRATED CONTINGENCY PLAN

JOB NO:	222631.00
DATE:	JULY, 2010
SCALE:	NONE

FIGURE 3-1



LEGEND:

(1) HYDRAULIC ELEVATOR

NOTE: ALL ELEVATOR RESERVOIRS CONTAIN HYDRAULIC OIL. OIL RESERVOIR CAPACITIES ARE IDENTIFIED IN TABLE 3–6.

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SCALE:	NONE

FIGURE 3-2

4. INSPECTION, TESTING AND PREVENTIVE MAINTENANCE PROCEDURES

SUNY Fredonia implements a comprehensive inspection and preventive maintenance program on its containment systems, storage structures, and associated equipment. This Section describes these procedures and SUNY Fredonia's record keeping practices in accordance with 6 NYCRR §§ 373-3.9 (e), 613.4, 613.5, and 613.6; 40 C.F.R. § 112.7(e); and 29 C.F.R. § 1910.120(q)(2)(iii).

4.1 OIL STORAGE TANK INSPECTIONS AND TESTS

As required by 40 C.F.R. § 112.8(c)(6), SUNY Fredonia combines visual inspection with another testing technique for each tank, container, and drum that has an oil storage capacity of 55-gallons or greater[4]. The following sections outline the specific inspection and integrity testing procedures for all oil tanks and containers at SUNY Fredonia. The program consists of:

- Monthly and Annual Visual Inspections of ASTs performed by SUNY Fredonia personnel;
- Formal External Inspections and Leak Tests of certain ASTs performed, as needed, by a qualified tank inspector;
- Tank Integrity Tests of USTs and ASTs performed, as needed, by a qualified tank tester;
- Inspections of oil-containing 55-gallon drums;
- Regular Testing of Devices to ensure that equipment remains in good working order; and
- Other PBS required testing.

The elements of SUNY Fredonia's AST inspection and testing program were developed in accordance with the Steel Tank Institute's (STI's) "Standard for the Inspection of Aboveground Storage Tanks," SP001, 4th Edition (July 2006). This standard is applicable to shop-built ASTs. All of SUNY Fredonia ASTs are shop-built tanks. If the results of an inspection or test indicate evidence of leakage or significant deterioration of a tank or container, SUNY Fredonia will remove the tank or container from service and either repair or replace it.

4.1.1 Monthly Visual Inspection of Aboveground Tanks and Containers

It is SUNY Fredonia's policy to inspect aboveground tanks, containers, and drums that have oil storage capacities equal to or greater than 55-gallons on a monthly basis in accordance with the STI SP001 Standard, Oil SPCC regulations and 6 NYCRR § 613.6(a). Tank equipment (i.e., gauges, valves, leak detection systems, alarm/warning systems) is inspected for evidence of maintenance deficiencies and periodically tested in accordance with manufacturers' recommendations to ensure that it remains in good working order.

Monthly and annual inspections are performed on ASTs by designated personnel who have been trained to perform the inspections per the STI SP001 standard. Figure 4-1 is the inspection sheet used for the monthly inspections of aboveground tanks.

[4] Oil-filled electrical and operating equipment are not considered bulk storage containers for these purposes, and are therefore not subject to the inspection and testing requirements.

Records of these inspections are also maintained for at least 10 years to ensure compliance with New York Petroleum Bulk Storage and Federal Oil SPCC regulations. See 40 C.F.R. § 112.7(e) and 6 NYCRR § 613.6(c).

4.1.2 Annual Visual Integrity Inspections of ASTs

SUNY Fredonia has several shop-fabricated ASTs that undergo a more detailed annual visual inspection, performed by trained SUNY Fredonia personnel. The annual visual inspections consist of the elements of STI's annual inspection as presented in Appendix B.

4.1.3 Formal AST External Inspections and Leak Testing

SUNY Fredonia's shop-fabricated AST systems are potentially subject to formal external inspection and leak testing requirements (as defined by the STI SP001 standard) according to the capacity of the tank, the means of secondary containment, and the presence of a continuous release detection method.[5] Because each of the ASTs has less than 5,000 gallons of capacity, has secondary containment, and is provided a continuous release detection method through visual observations, formal external inspections and leak testing by a qualified tank inspector are not required on a routine basis per STI standards.

4.1.4 AST Integrity Tests

SUNY Fredonia will retain the services of a qualified tank testing contractor to perform an integrity test of an AST in accordance with the STI Standard SP001 or other industry standard determined by the tank tester to be appropriate for the type of tank, under the following circumstances:

- Whenever material repairs or alterations are made to the tank;
- If evidence of a leak occurs;
- In the event of damage to the tank or containment structure; or
- If the results of a certified tank inspection reveals evidence of leakage or deterioration.

An affected tank will remain out of service until it is repaired and tested to confirm its integrity or it is otherwise replaced.

4.1.5 Underground Storage Tank Inspections and Inventory Monitoring

In accordance with 6 NYCRR § 613.5(b)(3), SUNY Fredonia conducts and documents monthly inspections of the UST system panels to confirm that leak detection equipment is operating properly. Records of the monthly inspections are maintained for at least one year.

A tank inventory record, which includes an assessment of the presence of water, oil use, deliveries, inventory on hand, and any unexplained losses or gains, is conducted daily on the No. 2 fuel oil and diesel USTs per 6 NYCRR § 613.4. The inventory records are maintained for at least 5 years. Integrity testing will be conducted on the USTs, as needed, by a qualified contractor, when any of the criteria in section 4.1.4 are met.

[5] A continuous release detection method is defined under STI as a means of detecting a release of liquid through inherent design. It can be passive, such as visual detection, but must be designed in accordance with good engineering practice.

4.1.6 Regular Testing of Devices

In addition to the frequent visual inspections, formal exterior inspections, and integrity testing, SUNY Fredonia also performs regular testing of devices in accordance with manufacturers' recommendations for all equipment associated with oil storage. For example, high level alarms and product gauges are periodically tested to ensure they are in working order.

4.1.7 55-Gallon Drum Inspections

SUNY Fredonia ensures that all 55-gallon drums containing oil (used and product oil) are visually inspected on a monthly basis in accordance with the visual inspection procedures identified above. A sample inspection sheet is included as Figure 4-2.

SUNY Fredonia uses the following usual and customary business practices to ensure the integrity of 55-gallon drums:

- **Retirement Schedule.** All 55-gallon drums are retired after, at most, 5 years of use.
- **Loading/Unloading Procedures.** Drum loading and unloading procedures are performed in a way that is protective of the drums and their contents. Proper drum handling equipment (i.e., drum carts, fork lifts) is used and care is taken not to puncture or damage the drums.
- **Replacement and Disposal.** If monthly visual inspections or informal inspections reveal that a drum is leaking, dented, corroded, rusted, or compromised in some way, SUNY Fredonia will immediately transfer the product in the drum to a new drum and appropriately dispose of the empty drum.

4.2 INSPECTIONS OF HAZARDOUS AND UNIVERSAL WASTE STORAGE AREAS

SUNY Fredonia maintains two "90 day" hazardous waste storage areas located in the Chemistry Volatile Stockroom (underground bunker located adjacent to Houghton Hall) and also in the chemical storage room in the Services Complex. These areas are inspected weekly using the form in Figure 4-3, and the records are maintained for at least one year. In addition, SUNY Fredonia accumulates hazardous waste in the satellite accumulation areas identified on Table 4-1.

Waste lamps are stored in boxes in each building where they are generated. Periodically, the lamps are brought to the central waste lamp storage area located in the Services Complex where they are prepared for shipment. EHS inspects the building storage areas once per semester.

4.3 PREVENTIVE MAINTENANCE PROCEDURES

SUNY Fredonia routinely inspects and replaces equipment as part of its preventive maintenance program. If an inspection shows that continuation of an operation or practice is likely to result in an imminent release, prompt action will be taken. Examples of imminent release indicators include, but are not limited to, leaking valves, pumps, and pipe joints; malfunctioning relief devices; and inadequate gauging. If an inspection shows that an operation or practice is not an imminent threat to cause a release, but is malfunctioning and could lead to a release if not remedied, appropriate repairs/action are completed as soon as practicable. Examples of probable release causes include, but are not limited to, damaged dikes and external coating deficiencies.

SUNY Fredonia properly designed to minimize abrasion and corrosion and allow for expansion and contraction. SUNY Fredonia ensures that all piping systems are properly designed to minimize abrasion

and corrosion and allow for expansion and contraction. Damaged, worn, or leaking pipe sections are repaired or replaced upon detection.

Figure 4-1: Monthly AST Inspection Form

SUNY Fredonia, 155 McGinnies Hall, Fredonia, NY 14063

PBS # 9-037877

Check for the presence and acceptable condition of all the following applicable parameters and note any comments or deficiencies on the reverse.

THOROUGHLY CHECK THE FOLLOWING ITEMS:	PLACE A √ IF SATISFACTORY					
Tank Number:	5	8	9	13	14	15
TANKS						
✓ Drip marks/ discoloration of tank/container						
✓ Tank/container openings properly sealed (*)						
✓ Evidence of leakage around tank, pad, containment, ringwall, or ground (*)						
✓ Corrosion, thinning, or cracks						
✓ Damaged or thinning of paint or coating						
✓ Damaged or worn bolts						
✓ Excessive settlement of structures/foundation weakness						
✓ Check for water in tank (*)						
TANK PIPING						
✓ Evidence of leaked stored material						
✓ Discoloration						
✓ Drain valve operable/in closed position (*)						
✓ Vent pipe blocked with ice, snow, or debris						
✓ Corrosion, thinning, or cracks						
✓ Bowing of pipe between supports						
✓ Damaged bolts or gaskets						
✓ Signs leakage on valves or seals						
SECONDARY CONTAINMENT						
✓ Cracks						
✓ Discoloration						
✓ Evidence of leaked stored material						
✓ Corrosion or thinning of containment shell						
✓ Drain valve operable/in closed position (*)						
✓ Oily residue or water in containment (*)						
✓ Debris or fire hazard in containment (*)						
TANK EQUIPMENT AND APPURTANANCES						
✓ Leak detection system in good condition						
✓ Tank level gauge readable/in good condition (*)						
✓ Primary vent/emergency vent						
✓ Ladder/platform secure and in good condition (*)						
TANK/FILL PORT MARKING						
✓ Tank labeled with ID#, working & design capacities						
✓ Fill port color coded and symbol marked						

(*) These items meet STI SP001 monthly inspection requirements.

NOTABLE COMMENTS, FINDINGS, EQUIPMENT DEFICIENCIES TO REPORT	
TANK #	ISSUE(S)

TANK #	LOCATION
5	Garage – Engine Oil
8	Garage – Used Oil
9	Steele Hall Field House (outside)
13	Erie Hall
14	Maytum Hall
15	Jewett Hall

Spills must be reported to the NYSDEC unless they meet all of the following criteria:

- The spill is known to be less than 5 gallons; and
- The spill is contained and under the control of the spiller; and
- The spill has not and will not reach the State's water or any land; and
- The spill is cleaned up within 2 hours of discovery.

In the event any of these criteria are not met, immediately contact Anne Podolak at 673-3796, so the spill can be reported to the NYSDEC.

Inspector Signature: _____

Date: _____

This inspection has been performed in a manner consistent with 6 NYCRR § 613.6.

Figure 4-2: Monthly Oil-Containing 55-Gallon Drum Inspection Form

Petroleum Drums						
LOCATION	NUMBER OF DRUMS AND CONTENTS	DRUM CONTENTS CLEARLY MARKED? (Y/N)	FREE OF EVIDENCE OF DETERIORATION, RUST, OR LEAKAGE? (Y/N)	SECONDARY CONTAINMENT IN PLACE? (Y/N)	FREE OF EVIDENCE OF SPILLS, DEBRIS OR FIRE HAZARD IN CONTAINMENT? (Y/N)	CONTAINMENT FREE OF WATER/SNOW/OIL? (Y/N)
Heating Services	Up to (8) motor, compressor and used oil and stoddard solvent					
Garage	(4) engine, hydraulic and transmission oil					
Shaw Commissary	Up to (12) waste cooking oil					
Williams Center	Up to (2) waste cooking oil					

CORRECTIVE ACTIONS/COMMENTS: _____

_____

_____

Inspector Signature:_____

Date: _____/_____/_____

Most oil spills must be reported to the NYS DEC within 2 hours. Please refer to the Oil SPCC Plan for spill reporting requirements. In the event of an oil release or suspected release, immediately contact Anne Podolak at 673-3796.

Figure 4-3: 90-Day Hazardous Waste Storage Area Checklist

Week Of:						
Inspector						
Time of Inspection						
Is the "90-DAY" accumulation start date clearly marked and visible on each container 6NYCRR §373-1.1(d)(iii)(c)(2)						
Is each container labeled "HAZARDOUS WASTE" 6 NYCRR 373-3.9(d)(3))						
Is each container in good condition (e.g., free of rust, bulges, dents, and leaks) 6 NYCRR §373-3.9(b)						
Is each container tightly closed except when hazardous waste is being added or removed 6 NYCRR §373-3.9(d)(1)						
Are incompatible hazardous wastes separated 6 NYCRR §373-3.9(c)						
Is there sufficient aisle space to allow for the unobstructed movement of personnel and fire protection/spill control equipment 6 NYCRR § 373-3.3 (f)						
Is the emergency communication device in good working order 6 NYCRR §373-3.3(d)						
Prior to transport, is each package of hazardous waste labeled and marked with the applicable US Department of Transportation regulations 6 NYCRR §372.2 (a)(5)(6)						
Prior to transport, is each container with a capacity of 110 gallons or less labeled: "HAZARDOUS WASTE--Federal Law Prohibits Improper Disposal. If found, contact the nearest police, public safety authority, or the US Environmental Protection Agency" 6 NYCRR §372.2(a)(6)						

Table 4-1: List of Satellite Accumulation Areas

Building	Operation	Room	Location in Room
Jewett Hall	Research Lab	116	inside hood
Jewett Hall	Research Lab	123	inside hood
Jewett Hall	Research Lab	125/127	inside hood
Jewett Hall	Research Lab	133	inside hood
Jewett Hall	Research Lab	135/137	inside hood
Jewett Hall	Research Lab	141	inside hood
Jewett Hall	Research Lab	207/209	inside hood
Jewett Hall	Research Lab	213/215	inside hood
Jewett Hall	Research Lab	217/219	inside hood
Jewett Hall	Research Lab	230	inside hood
Jewett Hall	Research Lab	232	inside hood
Jewett Hall	Teaching Lab	117	inside hood
Jewett Hall	Teaching Lab	129	inside hood
Jewett Hall	Teaching Lab	131	inside hood
Jewett Hall	Teaching Lab	211	inside hood
Jewett Hall	Teaching Lab	221	inside hood
Jewett Hall	Teaching Lab	223	inside hood
Jewett Hall	Teaching Lab	233	inside hood
Houghton Hall	Research Lab	202	inside hood
Houghton Hall	Research Lab	203	inside hood
Houghton Hall	Research Lab	206	inside hood
Houghton Hall	Lab	208	inside hood
Houghton Hall	General Chem Lab	211	inside hood
Houghton Hall	General Chem Lab	214	inside hood
Houghton Hall	Inorganic Lab	217	inside hood
Houghton Hall	P-Chem Lab	219	inside hood
Houghton Hall	Organic Lab	222	inside hood
Rockefeller Arts Center	Printmaking Room	231	Flammable Storage Locker
Rockefeller Arts Center	Oil Painting	317	Flammable Storage Locker
Services Complex	Heating Services Workshop		
Services Complex	Garage		
Services Complex	Painting Department		Flammable Storage Locker

5. DISCHARGE DETECTION, EMERGENCY WARNING, AND COMMUNICATION DEVICES

This section describes discharge detection and emergency warning devices, SUNY Fredonia's emergency communication devices, and it meets the requirements of 6NYCRR§§373-3.3(c) and 373-3.4(c)(5).

5.1 DISCHARGE DETECTION AND EMERGENCY WARNING SYSTEMS

Rooms that house chillers with R-22 refrigerant are equipped with a two-stage alarm. The first stage alarm is triggered by a sensor that detects a release of 100 parts per million (ppm). After 5 minutes, the system notifies a supervisor in Energy Management. The second stage alarm is triggered at 500 ppm and alarms locally. R-123 does not require an alarm because it remains a liquid up to 80°F.

All buildings on campus are equipped with fire pull boxes, heat detectors, and fire alarm systems that are tied into a locally-supervised system (Simplex panel located in the University Police office). Fire alarm signals go directly to the University Police Dispatcher who notifies the Fredonia Fire Department.

The gasoline and diesel underground fuel oil tanks are equipped with alarmed leak detection systems. Most of the aboveground fuel oil tanks for the emergency generators throughout campus are equipped with whistle alarms which are triggered if overfilled.

5.2 COMMUNICATIONS SYSTEMS

5.2.1 Telephones and Fax Machines

The primary emergency communication system at SUNY Fredonia is the telephone system. Telephones are located within immediate access of the "90-day" hazardous waste storage area and of all the satellite hazardous waste accumulation areas. Whenever hazardous waste is handled, all personnel involved in the operation have immediate access to a telephone or other emergency communication device. The phone extension (3333) is used to report emergencies to the University Police 24-hours a day, 365 days a year. Posted throughout campus are prominent red Emergency Response Quick Reference Flip Charts with specific instructions for:

- power/utilities failure
- weather emergency
- crime in progress
- fire and/or smoke
- chemical spill or release
- employee/student injury or death
- building evacuation; and
- explosive device or bioterrorism threat.

Fax machines are also located in all college buildings and all college personnel have access to a fax machine.

5.2.2 Emergency Telephones

Emergency blue light phones are located throughout the campus as indicated on Figure 5-1. The emergency phones are lit with blue lights at night to make them easily visible. The box telephones provide the caller with a direct link to University Police when used for an emergency. To make an emergency call, the caller opens the box and presses the red button. University Police receives the call and immediately dispatches an officer to that location. The phones may also be used to make local calls within the Fredonia exchanges.

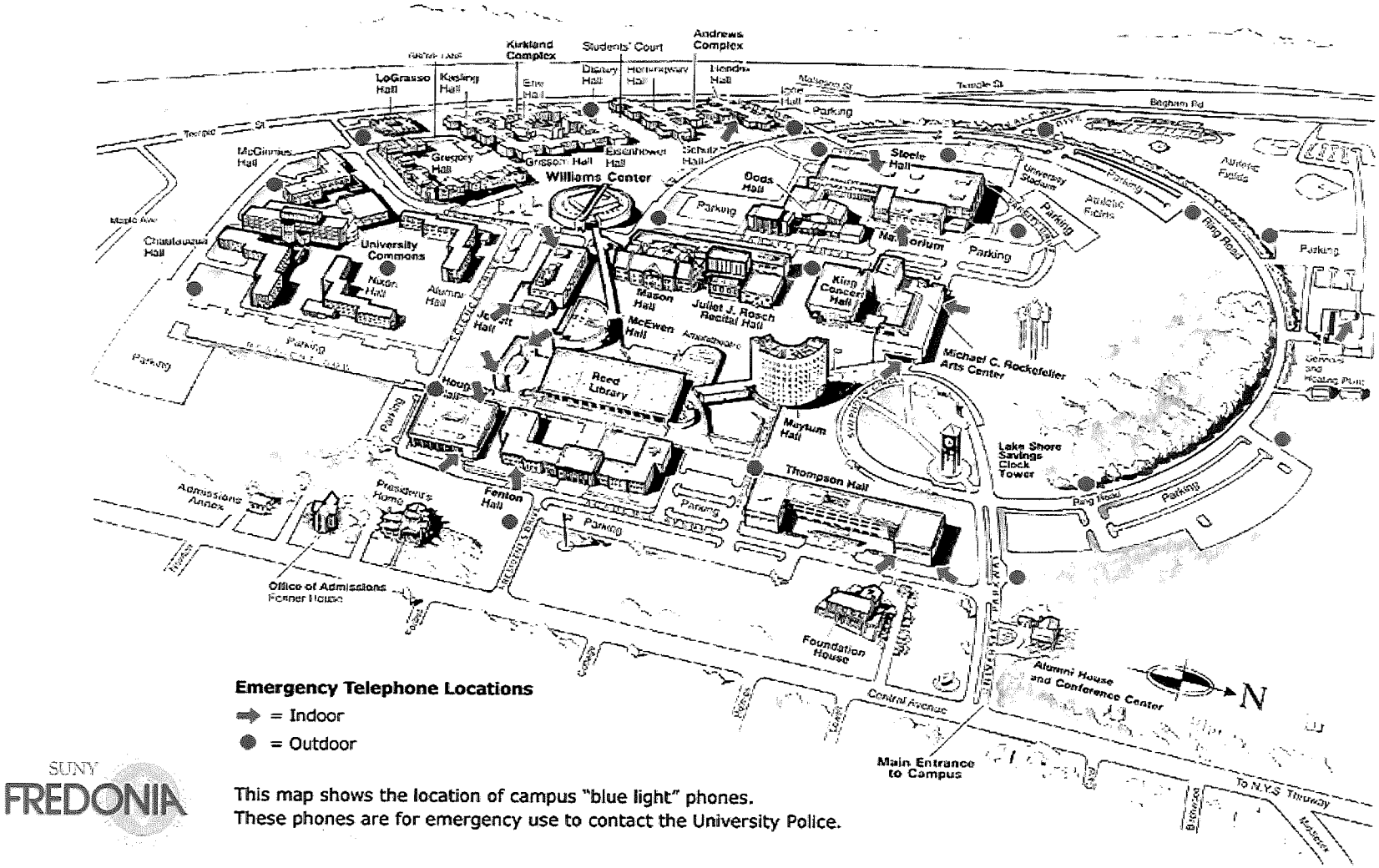
5.2.3 Radio Equipment

Hand-held two-way radios and patrol car radios are routinely used for communication by Facilities Services and University Police personnel. University Police has a separate dispatch center to coordinate radio traffic.

The University Police radio system is set up as follows

Radio Channel	No. of Portable Units	No. of Patrol Car Radios	Frequency
1. University Police	24	4	1453.0500

Figure 5-1: Emergency Telephone Map



6. EMERGENCY RESPONSE AND PERSONAL PROTECTIVE EQUIPMENT

This section identifies SUNY Fredonia's fire prevention equipment; personal protective equipment (PPE); hazardous material and oil spill cleanup equipment; and describes the inspection and maintenance schedule for this equipment in accordance with 6 NYCRR §373-3.3(c)(3) and 29 C.F.R. § 1910.120, Appendix A. It also describes SUNY Fredonia's water supply and the manner in which aisle space is maintained in accordance with 6 NYCRR §§373-3.3(c)(4), 373-3.3(f) and 373-3.4(c)(5).

6.1 FIRE PREVENTION EQUIPMENT

As described above in section 5.1, the fire alarm systems in all buildings on campus are tied into the University Police Dispatcher who will notify the Fredonia Fire Department in the event of a fire related emergency. The Fredonia Fire Department can respond to a fire related emergency within minutes. The Dunkirk Fire Department can provide backup if needed. All buildings on campus are equipped with fire extinguishers, fire pull boxes, and sprinkler suppression systems. See Appendix D for details on the fire suppression systems in individual buildings. There are fire hydrants and fire department connections located throughout the campus. See locations of fire hydrants on Figure 6-1 and fire department connections on Figure 6-2. Water supply is provided at adequate volume and pressure at the 38 fire hydrants on campus to suppress foreseeable fires. 6 NYCRR §373-3.3(c)(4).

6.2 PERSONAL PROTECTIVE EQUIPMENT (PPE)

SUNY Fredonia has performed a hazard assessment of the various tasks conducted by employees. New hazard assessments are done for all new tasks that pose potential health and safety risks, and employees are informed of required and/or appropriate PPE to use. The PPE Hazard Assessments are on file in the EH&S office. SUNY Fredonia pays for all required PPE and employees are responsible for maintaining their PPE. Most of the labs and maintenance shops have their own PPE storage areas. PPE used by SUNY Fredonia employees include:

- Eye protection - safety goggles and face shields;
- Hearing protection - ear plugs;
- Chemical gloves - gloves used should be appropriate for the material being handled;
- Protective clothing - lab coats and aprons;
- Respirators and dust masks; and
- Safety shoes.

6.3 MEDICAL SUPPLIES

The Health Center in LoGrasso Hall is available to provide limited medical care to all college employees and students. In addition, first aid kits for the use of college employees and students are located in various buildings throughout the campus. Serious injuries are treated at Brooks Memorial Hospital in Dunkirk.

6.4 OIL AND CHEMICAL SPILL CLEANUP EQUIPMENT

SUNY Fredonia contacts the Fredonia Fire Department or a private spill clean up contractor for major spills. The private clean up contractor has sufficient equipment and materials (i.e., drums, containers,

vacuum trucks, earth moving equipment, absorbent materials) to handle any potential oil release at SUNY Fredonia.

However, SUNY Fredonia's employees may respond to small leaks or spills that do not pose significant risk to health or safety. Chemical spill kits have been provided in all labs where hazardous chemicals are used.

The Services Complex has the following spill containment and clean-up equipment:

- Spill pads;
- Spill socks;
- Absorbent clay; and
- Small and large booms.

Portable spill kits are also located in the following rooms in Jewett and Houghton Halls:

- Houghton Hall: Stockroom; Room 209; every lab; and the loading dock.
- Jewett Hall: every lab.

Regular inspections are conducted on all PPE, fire prevention and spill response equipment to ensure proper operation during emergencies. Inspection records are maintained by the individual departments.

See 29 C.F.R. § 1910.120, Appendix A.

6.5 EYE WASH STATIONS AND CHEMICAL SAFETY SHOWERS

Eye wash stations and chemical safety showers are located throughout the campus wherever hazardous materials are stored. Eye wash stations and showers are inspected regularly by trained employees for the following parameters:

1. Unobstructed access;
2. Clear water;
3. Working status of hand paddle, foot paddle, and shower pull device;
4. Leaking pipes;
5. Even flow through both eyewash nozzles;
6. Eyewash water streams meet;
7. Caps on eyewash station loosely fitted;
8. Cleanliness of eyewash bowl and nozzle;
9. Station is painted yellow and black; and
10. Green and white emergency sign is visible.

Inspection records are maintained by the supervisors of individual departments. Custodians flush the eye wash stations monthly.

6.6 AISLE SPACE

SUNY Fredonia maintains adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment throughout all areas of the college. See 6 NYCRR§373-3.3(f).

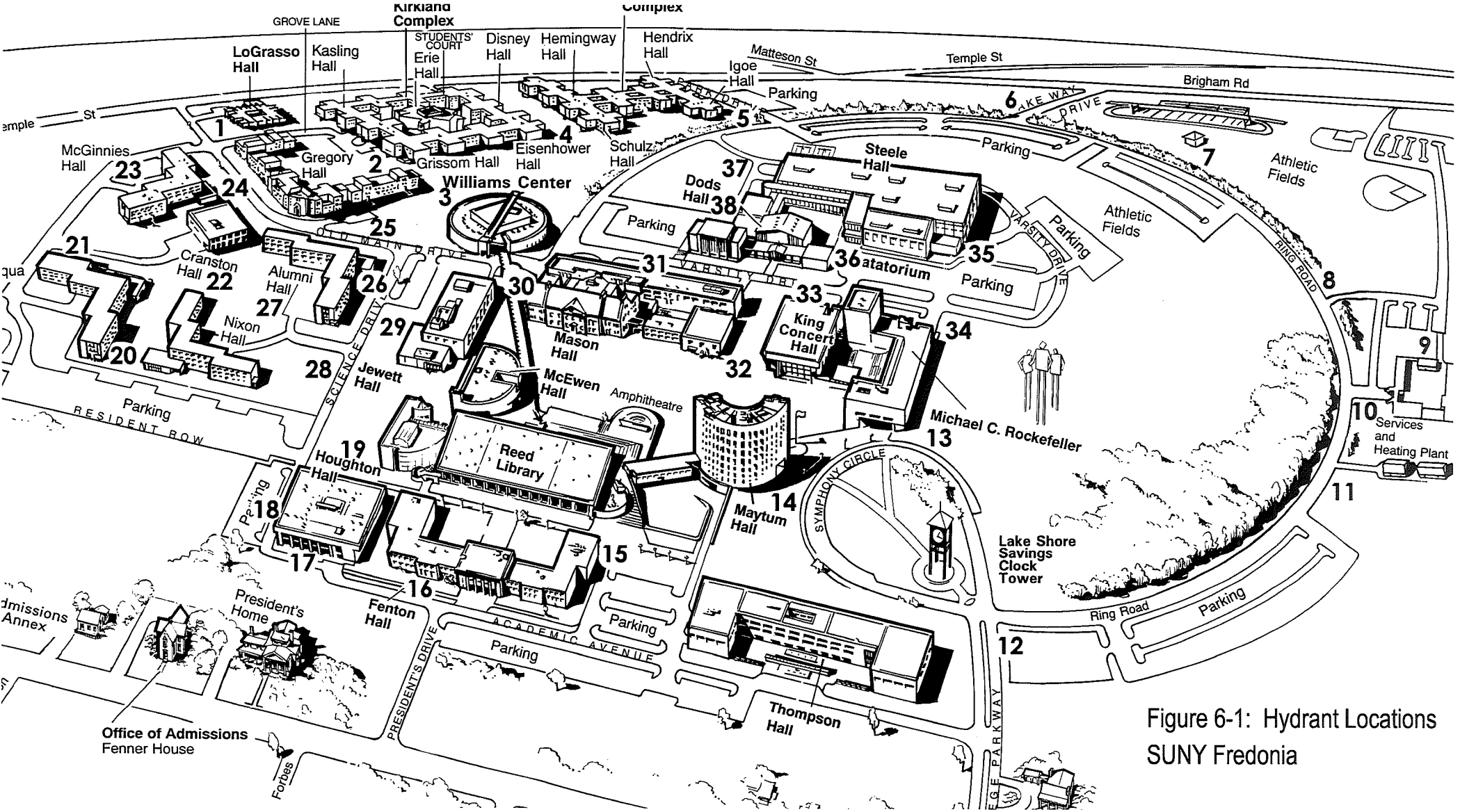


Figure 6-1: Hydrant Locations
SUNY Fredonia

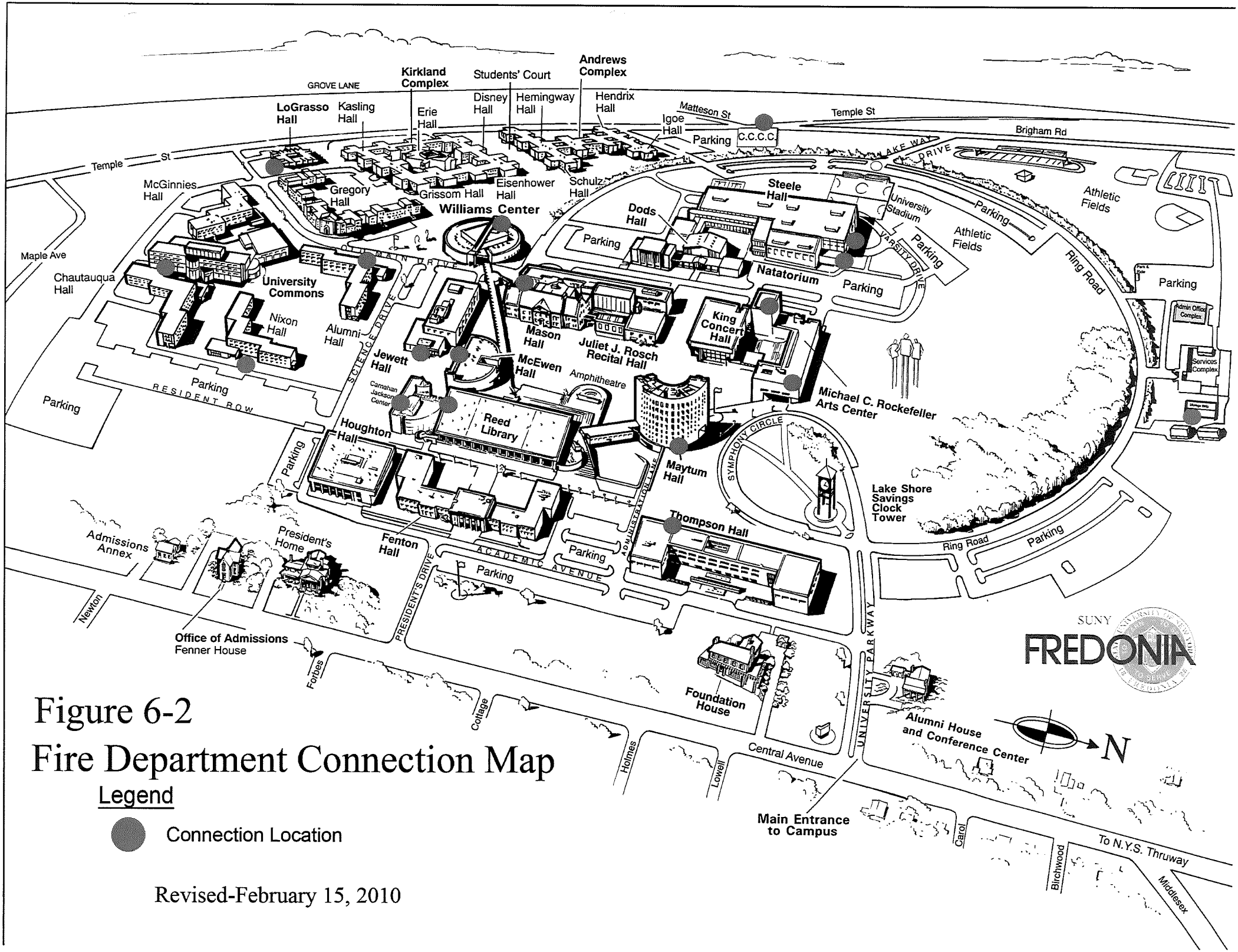


Figure 6-2
Fire Department Connection Map

Legend

● Connection Location

Revised-February 15, 2010

7. EMPLOYEE TRAINING PROGRAMS

SUNY Fredonia provides several different training programs to its employees. Some of these programs focus on proper and effective emergency response and compliance with regulatory requirements; other programs focus on spill and accident prevention through best management work practices, and the steps SUNY Fredonia has developed to reduce the risk of accidents and spills. Depending on individual job requirements, SUNY Fredonia employees complete one or more of the programs described below.

The training programs described in this section relate to hazardous material information, handling and management; and emergency response training for all SUNY Fredonia employees. SUNY Fredonia's training programs comply with 29 C.F.R. §§ 1910.120(q)(6) (emergency response), 1910.1200(h) (hazard communication), 1910.134 (respiratory protection), 1910.146 (confined space), 1910.147 (lockout/tagout), 1910.178 (forklift training), and 1926 Subpart J (welding and cutting); 40 C.F.R. §§ 112.7(f) (Oil SPCC) and 6 NYCRR §373-3.2(g) (hazardous waste management and contingency plan implementation); and 19 C.F.R. Part 172 (DOT hazardous materials).

In addition to the training programs described below, SUNY Fredonia provides several additional training programs. For example, SUNY Fredonia employees are, where appropriate, trained on: safe work practices; security procedures; appropriate use, inspection and maintenance of PPE and the location thereof; internal and external reporting procedures; college evacuation procedures; confined space entry; and lock-out tag-out procedures.

While some employee training sessions may not be required under a specific law or rule, they are integral to SUNY Fredonia's operations and philosophy. Moreover, these training sessions are considered as important as the training sessions developed to comply with specific laws and rules.

7.1 HAZARD COMMUNICATION TRAINING

All SUNY Fredonia employees who work with or may be exposed to hazardous chemicals (defined at 29 C.F.R. § 1910.1200(c)) at SUNY Fredonia are trained on the safe use and handling of the chemicals to which they may be exposed, in accordance with the federal hazard communication standard ("HCS"), the New York Right-to-Know law, and SUNY Fredonia's written hazard communication plan (see Chapter 19).

Details of SUNY Fredonia's Hazard Communication Training, such as the scope of training, training materials used, and training responsibilities of the various department heads, are given in Chapter 19. See 29 C.F.R. § 1910.1200(h).

7.2 HAZARDOUS MATERIAL RESPONSE TEAM TRAINING

SUNY Fredonia relies primarily on the Chautauqua County Hazardous Materials team to respond to hazardous material "emergency incidents" at SUNY Fredonia. However, SUNY Fredonia employees who are likely to witness or discover leaks or releases of hazardous substances (defined in Chapter 11) have been trained to the first responder awareness level, i.e., to identify the incident and get help. Some SUNY Fredonia employees have been trained to the first responder operations level, i.e., to respond defensively to a release or potential release of a hazardous substance as part of the initial response to the incident to protect nearby people, the environment, or property. SUNY Fredonia employees, however, do not respond offensively to hazardous material "emergency incidents."

7.3 HAZARDOUS WASTE MANAGEMENT TRAINING

SUNY Fredonia is a large quantity generator (LQG) of hazardous waste. SUNY Fredonia provides annual hazardous waste compliance and contingency plan training to all employees who manage hazardous waste. SUNY Fredonia's hazardous waste compliance and contingency plan implementation training program is designed to reduce the potential for mistakes involving hazardous waste which could threaten human health or the environment, and to ensure compliance with New York State hazardous waste regulations. 6 NYCRR §373-3.2(g).

All college personnel that handle hazardous waste complete the program described below within six months of their assignment to a new position that involves handling hazardous waste. Employees who have not completed hazardous waste training are not permitted to work in an unsupervised position that requires handling of hazardous waste. Personnel that handle hazardous waste are required to complete an annual review of the initial training program. 6 NYCRR §§373-3.2(g)(2) and (3).

Hazardous waste training emphasizes educating employees to: (1) be thoroughly familiar with their job responsibilities, and (2) perform their job responsibilities in a manner that ensures compliance with New York and Federal hazardous waste rules. The program is also designed to educate personnel why certain tasks are performed in a prescribed manner. By providing employees with a thorough explanation of why certain operations are performed as they are, the use of "short-cut" procedures, which may be dangerous to SUNY Fredonia personnel or property, and/or the surrounding population, should be eliminated.

The training includes classroom instruction, on-the-job training and hands-on training. The training program, where appropriate, covers the following areas:

1. Communication and alarm systems;
2. Response to fires, explosions and hazardous material releases;
3. Internal and external notification procedures;
4. Evacuation procedures;
5. Training in use of fire extinguishers;
6. Procedures for using, inspecting, repairing and replacing college emergency and monitoring equipment;
7. Hazardous waste contingency plan implementation;
8. Hazardous waste identification;
9. Hazardous waste management requirements; and
10. Record keeping.

Training records are maintained by the Director of EHS.

7.4 OIL SPCC TRAINING

SUNY Fredonia provides Oil SPCC training to all oil-handling employees and those who play a role in the implementation of this Plan. SUNY Fredonia's Oil SPCC training program instructs employees involved with the handling of oil and/or oil containment devices, structures, and equipment on:

- Contents of SUNY Fredonia's Oil SPCC Plan;

- The proper operation and maintenance of equipment to prevent discharges and general facility operations;
- Oil discharge procedures, including notification and use of available spill equipment;
- Instructions regarding applicable oil pollution control laws, rules, and regulations; and
- Instructions regarding tank inspection procedures (designated employees only).

Oil SPCC training is provided to all new oil-handling employees. Oil SPCC training records are maintained with this Plan by the Oil SPCC Coordinator.

7.4.1 Discharge Prevention Briefings

Annual discharge prevention briefings are conducted for oil-handling personnel, and cover the following topics:

- *Oil SPCC Plan Update* – discuss any Plan changes to ensure that oil-handling employees retain an adequate understanding of the Oil SPCC operations.
- *Discharges* – highlight and describe discharges that have occurred in the past year; discuss response actions; effectiveness of oil spill response equipment; describe actions taken to prevent recurrence.
- *Failures and Malfunctioning Components* – discuss any known equipment failures or malfunctioning components related to oil storage.
- *Precautionary Measures* – brainstorm current or new precautionary measures to prevent oil releases.

Records of Annual Discharge Prevention Briefings are maintained with this Plan by the Oil SPCC Coordinator.

7.5 FIRE FIGHTING TRAINING

The Fredonia Fire Department, as the primary responder, responds to all fire related emergencies. The Director of EHS, University Police patrol officers, Facilities Services personnel and Residence Life personnel at SUNY Fredonia are trained on the proper use of fire extinguishers in accordance with 29 C.F.R. §§ 1910.157-159. Fire safety training is provided to students and campus staff (University Police, Facilities Services and Residence Life staff) at least annually by the Director of EHS. Unannounced annual fire drills are carried out in all residence halls, academic buildings and administrative buildings on an annual basis at a minimum.

7.6 MISCELLANEOUS TRAINING

Certain SUNY Fredonia Facilities Services employees get specialized training depending on the jobs they perform. This training is organized by the Director of EHS and includes, but is not limited to:

- Lockout/Tagout Training;
- Confined Space Entry Training;
- Hearing Conservation Training;
- Respiratory Protection; and

- Forklift training.

7.7 EXERCISING AND EVALUATING THIS ICP

SUNY Fredonia may perform an annual drill to test the effectiveness of this ICP.

7.7.1 Evacuation Drill

SUNY Fredonia conducts an annual evacuation drill and documents the results using the questionnaire in Figure 7-1. Based on this questionnaire, this ICP may need to be revised. Revisions will be included and dated on the Revision Log by the Director of EHS and recorded at the front of this ICP on the Record of Changes. Evacuation drills may be based on potential emergencies other than a hazardous materials release, such as a fire drill.

7.7.2 Hazardous Materials Release Scenario

As noted above, the college tests its Facility Emergency Plan periodically. The periodic test may be a table top exercise; a constructive discussion using the ICP to resolve problems; a functional exercise which adds time constraints and an evaluation of the coordination and information exchanged; or a full scale, realistic, campus-wide exercise intended to evaluate the operational capability of the campus's emergency management system. Comments and suggestions as a result of these exercises may be implemented upon examination by the appropriate personnel. All comments contributing to revisions will be kept on file with the Director of EHS.

Because SUNY Fredonia relies on municipal public safety services such as the Fredonia Fire Department, when needed, these exercises are coordinated with the affected municipal and County or State Emergency Management Officials.

To clarify chemical safety for employees, please note that employees are trained during Hazard Communication training to safely handle the chemicals they work with. 29 C.F.R. § 1910.1200. This ICP addresses the requirements of proper evacuation and limited emergency response responsibilities for emergency chemical releases. 29 C.F.R. § 1910.120(q).

Figure 7-1: Evacuation Drill Critique Questionnaire

Date of Report_____ Date of Exercise or _____
Actual Evacuation _____

What happened?_____

What outside service responded?_____

Action taken:_____

What went well?_____

What needs to be improved (and steps to improve)?_____

Signature:

8. AREAS IN NEED OF PROTECTION

SUNY Fredonia is located less than a mile from the Canadaway Creek which flows into Lake Erie to the north. Since SUNY Fredonia uses hazardous materials, these water bodies may be adversely impacted by a hazardous material release at or from SUNY Fredonia. Measures taken by SUNY Fredonia, in part, to protect the areas identified below include: secondary containment of bulk hazardous material tanks; regular visual inspections of tanks and secondary containment structures and systems; regular preventive maintenance on tanks, secondary containment, associated equipment, emergency response equipment and PPE; personnel training on proper operating procedures and safe hazardous material handling practices; emergency spill and release response procedures; implementation of mock drills; post-incident investigations designed to ensure that emergency incidents do not reoccur; use of discharge detection devices; and adoption and implementation of this ICP.

Based on the preventive measures taken by SUNY Fredonia, it is extremely unlikely that a hazardous material release event at SUNY Fredonia would significantly impact these areas.

9. EMERGENCY RESPONSE PERSONNEL, ROLES AND LINES OF AUTHORITY, AND QUALIFICATIONS OF ON-SITE EMERGENCY RESPONDERS

This Chapter identifies SUNY Fredonia employees with emergency response duties, describes personnel roles, lines of authority, identifies emergency coordinators, and satisfies the requirements of 6 NYCRR §373-3.2(g); 6 NYCRR §373-3.4(c)(4); and 29 C.F.R. § 1910.120(q)(2)(ii). Communication procedures and systems, and employee training are described in Chapters 5 and 7, respectively.

9.1 CHAIN OF COMMAND

The University Police Chief is the designated emergency response official at SUNY Fredonia. The University Police Chief or one of the personnel listed in Table 9-1 will act as the Facility Emergency Coordinator (FEC) during an emergency at SUNY Fredonia. The supervisor of the outside emergency response team (e.g. the Fire Department or private spill contractor or one of his designees will act as the Incident Commander (IC).

In the event of a campus emergency created by weather conditions, a major fire, or a power, gas main, or communications shutdown, the University Police Chief is charged with the coordination of necessary procedures and the immediate notification of the President, Vice Presidents, and the Directors of Facilities Services, Residence Life and Food Services.

Decisions which affect the academic and administrative functions or living conditions of the students must be cleared through the appropriate Vice-President and approved by the President. In the event that immediate action is required to protect the safety of students and personnel or to prevent massive damage to the mechanical or electrical systems, the University Police Chief, and the Directors of Facilities Services, Residence Life and Food Services are empowered to implement necessary procedures, and reports should be made to the control centers.

9.2 EMERGENCY RESPONSE TEAM

SUNY Fredonia's Emergency Response Team is responsible for pre-planning for an emergency and providing support during an emergency incident. The team is headed by the Vice President for Administration and includes: the Director of EHS, the University Police Chief, and the Director of Facilities Services.

9.3 EMERGENCY OPERATION AND CONTROL CENTERS

During certain emergency incidents, the Emergency Response Team will establish an Emergency Operation Center (EOC) in the University Police Office in Gregory Hall (673-3333). Control Centers may also be established, if necessary, in the President's Office in Fenton Hall (673-3456), Facilities Services (673-3452), or the Environmental Health & Safety Offices (673-3796). The EOC will provide 24-hour communication capability, radios and other equipment, and necessary documents and procedures. If the Centrix telephone service is not functioning, communications will be maintained by use of two-way radios, cellular telephones, and police radios. Whenever notified of an emergency, all members of the team will go to the EOC. The University Police Dispatch Office will be notified that the EOC has been set-up and to direct all emergency related questions there. The team will coordinate response efforts from either the EOC or the actual site of the emergency incident.

9.4 POLICE DISPATCH OFFICE

The Dispatcher's Office at University Police Office is manned 24 hours a day, 365 days a year. On being notified of a potential emergency, the dispatcher at the center will send a University Police officer to investigate the situation. If needed, the dispatcher will contact the Fredonia Fire Department and other outside response agencies and request them to respond to the emergency. During response, the Dispatcher's Office will act as a central communication link between the responding parties and SUNY Fredonia personnel, if required.

9.5 STAFF ROLES AND RESPONSIBILITIES

The following sections describe the roles and responsibilities of all personnel who are involved in an emergency.

9.5.1 Facility Emergency Coordinator

When present during an emergency, the Facility Emergency Coordinator (FEC) is in charge of coordinating SUNY Fredonia's emergency response operations. See 6 NYCRR §373-3.4(c)(4) and 29 C.F.R. § 1910.120(q)(3). The FEC directs the activities of SUNY Fredonia officials and will continually advise the senior management of the status of an incident. For emergencies that require outside assistance or could potentially impact those outside SUNY Fredonia, the FEC will work with public officials, SUNY Fredonia's Public Information officer, and officials of other companies that may be involved.

During an emergency, the Facility Emergency Coordinator will:

1. Report to the EOC first, and assist the emergency team in any way possible.
2. Coordinate all communications between the Incident Commander and the EOC.
3. Be prepared to leave the EOC and work with the Incident Commander if necessary.

See 6 NYCRR §373-3.4(g).

During non-emergency times, the FEC will ensure that the ICP is reviewed and updated regularly, training is complete and all other pre-emergency preparedness responsibilities are properly fulfilled.

The FEC is responsible for coordinating the facility's response actions (e.g., ensuring all employees have evacuated safely, and the release area is barricaded until outside hazardous materials responders arrive at the scene.) See 29 CFR § 1910.120(q)(3). If possible, the FEC will identify, from a safe distance, the substance of concern, quantity released, source of release, and the extent of the release. The FEC has the authority to call upon expertise, as needed, to assist the response efforts from a technical information perspective. This may include assessing the possible health and environmental hazards posed by the release of an irritating or asphyxiating gaseous chemical, such as ammonia. During Level II or III emergencies (defined in Chapter 11), SUNY Fredonia employees may not approach the point of release to plug, patch or otherwise control the release. Affirmative response to emergencies is the job of outside, professionally trained hazardous materials response teams.

The FEC is the primary liaison between the facility and outside public and private emergency responders. The FEC will work with the outside responders and will coordinate resources and response efforts. The FEC, or his designee, is also responsible for making appropriate oral and written notifications of the incident to the State and Federal authorities. See Chapter 17.

9.5.2 Incident Commander

The IC is in charge of directing emergency response operations at the facility. During most emergency incidents, the IC role will usually be assumed by the person in-charge of the external response team (e.g. Fredonia Fire Department, outside hazardous materials responder etc.). Depending on the situation (e.g., fire, hazardous material release, medical emergency) and which Response Team members have responded (e.g., Fredonia Fire Department, or private contractor), IC responsibilities may shift.

9.5.3 Emergency Response Team

Upon notification of an emergency, SUNY Fredonia's Emergency Response Team members will report to the EOC and assist the FEC and outside response teams.

9.5.4 Vice President of Student Affairs

The Vice President of Student Affairs is responsible for notifying next of kin in the event of any SUNY Fredonia student or employee injury or death.

9.5.5 Public Information Officer (PIO)

The New Services/Media Relations Office (673-3323) will coordinate all communications with the media or public. Fact sheets, news releases, radio transmissions and any other type of public communications must first be approved by the President. The Vice President of College Relations, or one of his/her representatives will serve as the Public Information Officer (PIO).

On the advice of the FEC, the PIO will choose the best location for establishing a Media Operations Center (MOC) to serve as a briefing location for the news media. The location of the MOC will depend on the location and nature of the emergency at SUNY Fredonia. The initial communication with the news media may be by telephone and, if necessary, a public meeting with the media may be scheduled at the MOC.

9.5.6 Regional Public Information Officers

The following persons and locations have been designated as PIOs and MOCs by the municipal and county governments possibly affected by chemical releases at SUNY Fredonia:

- Primary – Emergency Management, Chautauqua County LEPC at 716-363-4341
- Secondary – Mayor's Office, Fredonia, NY at 716-679-2301

9.5.7 Oil SPCC Coordinator Responsibilities

The person who will most likely coordinate an oil release response at SUNY Fredonia will be the Oil SPCC Coordinator, identified in Table 9-1. The general responsibilities of the Oil SPCC Coordinator include:

- Oversee the development, implementation, and maintenance of the Oil SPCC Plan and oil spill prevention program;
- Serve as the designated person responsible for oil spill prevention;
- Identify any facility changes that would warrant amendments to the Oil SPCC Plan;

- Coordinate, organize and/or conduct annual spill prevention briefings for oil-handling personnel; and
- Maintain the first-aid stations, fire extinguishers, and spill containment equipment and supply areas at the designated locations.

The responsibilities of the Oil SPCC Coordinator during oil spill emergencies include:

- Assess the type, magnitude, and extent of the spill;
- Contact the facility responders to bring spill containment equipment to the spill location;
- Supervise facility responders during spill cleanup;
- Contact and coordinate with local off-site facility responders (i.e., fire, police, clean up contractors listed in Table 10-1), if necessary;
- Provide emergency medical care or arrange transportation via ambulance for off-scene medical services, if necessary;
- Arrange for the clean up and proper disposal of any released oil; and
- Report any spill of a reportable quantity to the NYSDEC (See Chapter 17).

9.5.8 Alternate Oil SPCC Coordinator Responsibilities

In the event that the Oil SPCC Coordinator is not available to coordinate an oil release response, SUNY Fredonia has an alternate Oil SPCC Coordinator, identified in Table 9-1. The role of the Alternate Oil SPCC Coordinator is: (1) to act as Oil SPCC Coordinator whenever the primary Coordinator is unable to perform his/her duties, or (2) to assist the Oil SPCC Coordinator in the event of an actual spill or release event. The Alternate Oil SPCC Coordinator is familiar with the role and responsibilities of the Oil SPCC Coordinator as listed above, in the event that he/she is called upon to fill this role during an actual spill emergency. The Oil SPCC Coordinator may delegate any of the responsibilities listed above to the Alternate Coordinator.

The Oil SPCC Coordinator and the Alternate Oil SPCC Coordinator periodically review the Oil SPCC provisions of the Plan and understand their assigned responsibilities. The Coordinators are familiar with the preventative inspection and testing requirements, and are prepared to implement the emergency response provisions of the Plan in the event of an oil release.

Table 9-1: Facility Emergency Coordinators

Name	Telephone/Extension/Cellular
Primary: Ann Burns University Police Chief	Office: 716-673-3333 Cell: 716-410-7200 Home: 716-672-5930
Alternate: Anne Podolak EHS Director, Oil SPCC Coordinator	Office: 716-673-3796 Cell: 607-346-2443 Home: 607-346-2443
Alternate: Kevin Cloos Facilities Services Director Alternate Oil SPCC Coordinator	Office: 716-673-3452 Cell: 716-672-9421 Home: 716-672-5667
Alternate: Markus Kessler	Office: 716-673-4743 Home: 716-627-1288

10. PRE-EMERGENCY PLANNING WITH OUTSIDE AGENCIES; AND EMERGENCY MEDICAL AND HEALTH TREATMENT RESOURCES

This chapter describes SUNY Fredonia's pre-emergency planning activities with emergency response providers and on and off-site emergency medical treatment resources. This section satisfies the requirements found at 29 CFR § 1910.120(q)(2)(i) and (viii); and 6NYCRR §373-3.3(g).

As described above, SUNY Fredonia contacts the Fredonia Fire Department and private emergency responders for most emergency incidents. The following entities provide emergency assistance on an as-needed basis:

- Fredonia Fire Department;
- Fredonia Police Department;
- A private spill contractor; and
- A contracted vendor who will provide buses for transport.

Phone numbers for outside emergency response agencies are listed on Table 10-1.

The Fredonia Fire Department is generally familiar with the layout of the college, properties of the hazardous material used by SUNY Fredonia, locations where hazardous material are stored, entrances and exits from the college, and designated evacuation routes. Moreover, the Fredonia Fire Department has been given lists of hazardous material handled in bulk (e.g., hazardous chemicals in quantities greater than 10,000 lbs, and extremely hazardous substances present in quantities exceeding applicable threshold planning quantities (TPQs)) at SUNY Fredonia and information describing the location and hazardous characteristics of these hazardous materials.

10.1 RESPONSIBILITIES OF OUTSIDE RESPONDERS

10.1.1 Fredonia Fire Department

Certain emergency incidents could occur at SUNY Fredonia that may be beyond SUNY Fredonia's ability to handle alone. If off-site emergency assistance is needed, the first outside response agency called is the Fredonia Fire Department. The University Police dispatcher or FEC will inform the Fredonia Fire Department of all information known about an emergency incident.

When the Fire Department arrives at SUNY Fredonia it will:

1. Assume IC responsibilities;
2. Be aware of and observe proper safety precautions for any hazardous chemical(s) involved;
3. Determine if evacuation of areas outside SUNY Fredonia is necessary and, if so, coordinate the evacuation with the Chautauqua County Local Emergency Planning Committee (LEPC);
4. Take actions necessary to counter the effects of the accident or incident;
5. Establish a forward command post at the scene, when necessary; and
6. Call additional local and state emergency responders, when necessary.

10.1.2 Fredonia Police Department

The Fredonia Police Department works in cooperation with the University Police Department and will provide the following services when asked to do so:

- Access control;
- Crowd control;
- Removal of security threats;
- Public evacuation assistance; and
- Traffic control.

Chautauqua County Sheriff's office and the New York State Police are also available to support these activities, if requested.

10.1.3 Medical and Ambulance Services

The Health Center at LoGrasso Hall is staffed by physician or nurse practitioner. The Health Center is open 9:00 a.m. to 6:00 p.m. Monday through Saturday. Serious injuries are sent to Brooks Memorial Hospital. If an individual is exposed to a hazardous material at SUNY Fredonia and is transferred to an off-site hospital for treatment, an MSDS will be provided to the ambulance provider and sent with the exposed person(s) to assist medical providers with appropriate treatment.

In case of an emergency, ambulance service is primarily provided by Allstar through the Fredonia Fire Department. However, SUNY Fredonia can also transport personnel to Brooks Memorial Hospital if necessary.

10.1.4 Cleanup and Emergency Response Contractors

A private spill clean up contractor will respond in the event of a major chemical or oil release.

Table 10-1: Outside Emergency Response Agencies

POLICE

Fredonia Police Department.....9-911; 716-679-1531

Chautauqua County Sheriff.....716-363-4900

New York State Police Headquarters.....716-679-1521

FIRE

Fredonia Fire Department.....9-911

AMBULANCE

Fredonia Fire Department (Allstar).....9-911

HOSPITALS

Brooks Memorial Hospital.....716-366-1111

REMIS/POISON CONTROL CENTER.....800-442-6305

Buffalo.....716-878-7654

OUTSIDE EMERGENCY RESPONSE ORGANIZATION

Global Environmental Industrial

tel: 716-366-3141

fax: 716-366-8736

Tim Wosnak cell: 716-572-1811

ENVIRONMENTAL EMERGENCIES

US Coast Guard - Oil Spill.....800-424-8802/780-3251

National Response Center.....800-424-8802

NYSDEC Oil and Hazardous Material Spill Notification.....800-457-7362

New York State Emergency Response.....518-402-9543

Commission / Bureau of Spill Response/DEC

Chautauqua County Local Emergency Planning.....716-363-4341

Committee, c/o Emergency Management

CHEMTREC - (24 Hour) Hotline.....800-424-9300

Chemical specific data can be obtained from the material safety data sheets (MSDSs) located in the college. Emergency phone numbers for specific chemicals are included on the MSDSs.

11. EMERGENCY RECOGNITION AND CHARACTERIZATION

SUNY Fredonia uses some hazardous materials that are stored in bulk tanks, drums, and other smaller containers throughout the campus. See Chapter 3, and Tables 3-1 through 3-6. These materials, if released, have the potential to cause emergencies at SUNY Fredonia and possibly in surrounding areas. SUNY Fredonia's response to a fire, medical emergency, or a hazardous material release will depend on the facts, circumstances, potential hazards and substances involved in each incident. All incidents will be evaluated and characterized as soon as possible. This Chapter describes what constitutes "emergency" and "non-emergency incidents," how emergency incidents are classified, the measures SUNY Fredonia implements depending on the severity of an incident (e.g., Level I, II or III), and the steps SUNY Fredonia has implemented to prevent emergencies from occurring. It also complies with some of the requirements of 29 C.F.R. § 1910.120(q)(2)(iii).

11.1 EMERGENCY AND NON-EMERGENCY INCIDENTS

11.1.1 Emergency Incident

An "emergency incident" is an occurrence which results, or is likely to result in fire, injury, explosion or an uncontrolled release of hazardous material to air, water (including groundwater), or soil. It involves a response effort by emergency responders and/or by designated outside responders (e.g., local and state response agencies, fire departments, and private emergency response teams). 29 C.F.R. § 1910.120(a)(3). Responses to releases of hazardous substances where there is no potential safety, health or environmental hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses according to this plan and 29 C.F.R. § 1910.120(q).

11.1.2 Non-emergency Incident

A "non-emergency incident" is an occurrence that does not pose a safety, health or environmental hazard. Non-emergency incidents are routine occurrences which can be handled safely by operational employees in the immediate work area or by maintenance personnel. For example, non-emergency incidents could include, without limitation:

- Repairs of a leaking pipe, container or tank (if the leak can be controlled by operational personnel without outside emergency assistance and it is not likely to adversely affect or threaten to affect human health or the environment); or
- Incidental hazardous material releases or spills which can be absorbed, neutralized, or otherwise controlled at the time of release by operational employees in the immediate area (e.g., if a small amount of oil or solvent spills, and an employee in the area can safely clean it by using absorbents, and can properly discard the waste material).

If the employee possesses the correct training and equipment to safely and effectively mitigate the incident, and there is no threat or potential threat to people, the environment, or property, then the incident may be classified as a non-emergency. Calling University Police to monitor any area to determine the presence or concentration of a hazardous substance is NOT considered to be an emergency. University Police officers will protect themselves properly and may declare an emergency if the situation warrants and meets the criteria for any emergency level defined in this chapter.

During a non-emergency incident, responding employees must comply with OSHA Workplace Protection Standards, and SUNY Fredonia's Safety Policies. See 29 C.F.R. § 1910.120(a)(3).

Whenever there is any question as to whether a spill, release or potential release of a hazardous substance is an emergency, responders should classify it as an emergency, initiate the proper defensive actions, and begin a sequence of notifications according to this plan. If subsequent evaluation of the situation shows that an emergency does not exist, the incident can be re-classified accordingly.

11.2 DEFINITIONS OF EMERGENCY INCIDENT LEVELS

The stage of the incident is determined by what has already happened, what is currently happening and what could happen. An incident in its early stages may be controlled with a Level I response. If not controlled quickly enough, the response level will likely change. The severity of the physical damage, possible side reactions (including fires) and possible health effects should be considered. The more hazardous the material, the more important it is to respond quickly to reduce or eliminate the hazards.

11.2.1 Level I

A Level I incident is the least serious and most easily handled emergency. It usually requires an initial isolation and evacuation of the immediate and surrounding area as a precautionary measure. Facilities Management personnel, with the assistance of the Director of EHS and/or University Police, will quickly determine if they can safely and effectively mitigate the incident. Certain trained employees are capable of addressing small releases by donning appropriate PPE and applying spill packs to stop small releases. If the Director of EHS or University Police determines that the release cannot be safely mitigated, it will be characterized as a Level II emergency.

11.2.2 Level II

A Level II incident usually requires expertise beyond the normal capabilities of SUNY Fredonia employees, and may pose some threat to life, environment or property. This type of incident will potentially impact college operations. Response to this level of incident will require specially trained emergency responders. The response will generally be from outside response agencies. Additionally, evacuations may be necessary, including areas adjacent to SUNY Fredonia. There may also be a need for special expertise and equipment. Emergency responders will designate someone as Incident Commander, according to this plan, and follow ALL standard operating procedures for an emergency response, regardless of the nature of the incident or degree of harm. All notifications will be made and necessary documentation kept.

11.2.3 Level III

A Level III incident is any incident that:

1. Requires widespread evacuation of the college and/or the community,
2. Involves multiple casualties and/or exposure, or
3. Potentially poses a serious threat to human health, the environment and/or property.

Level III incidents generally require assistance from outside emergency response agencies, additional resources, and large numbers of emergency responders. As with Level I and II emergencies, standard operating guidelines will be followed according to this Integrated Plan. Proper notifications will be made and necessary documentation kept.

11.3 CHARACTERIZING EMERGENCY INCIDENT LEVELS

During any emergency incident, it is the responsibility of the first properly trained responder at the scene to immediately determine the incident level and communicate this determination to all responders. The initial determination directs initial response actions.

Initial determinations can be revised when reclassification is warranted. However, the quicker an incident is classified correctly, the quicker the situation can be brought under control. Past experiences with similar types of incidents may be useful in determining the correct emergency level.

The following factors are considered when evaluating and classifying an emergency incident level:

- The type of incident (fire, explosion, release);
- Location of the incident;
- The hazardous material involved and the hazards potentially associated with the material;
- Size, duration, and characteristics of the incident, when available;
- Potential hazards to college personnel, public, and the environment;
- Corrective actions needed to control the incident and potential consequences of those actions;
- Potential for involvement of other college areas and the possibility of secondary incidents; and

Any mitigating or aggravating factors (e.g., weather conditions, proximity of incompatible material, loss of power).

12. INTERNAL EMERGENCY NOTIFICATION PROCEDURES

In the event of a chemical release at SUNY Fredonia, employees, students, and volunteers are immediately made aware of any imminent dangers. This Chapter describes how SUNY Fredonia notifies emergency and non-emergency response personnel, students, contract workers and college visitors of potential emergencies. It is designed to comply with the communication requirements under 29 C.F.R. § 1910.120(q)(2)(ii) and (ix) and 6 NYCRR §373-3.3(c).

12.1 INCIDENT DISCOVERY AND ALERTING

Employees with radios are trained to call the Dispatch Officer at the University Police Office directly if an emergency incident is observed or threatened. All other SUNY Fredonia employees have been trained to immediately call University Police at telephone extension 3333 as soon as they become aware of a situation that is, or may become, an emergency incident. In addition, University Police can be contacted by means of any emergency blue light phone located throughout the campus. The University Police Dispatcher will send a patrol officer to investigate the incident and if required or necessary contact outside response agencies.

12.2 EMERGENCY NOTIFICATION OF EMPLOYEES, STUDENTS AND VISITORS

SUNY Fredonia can inform its employees, students and visitors of an emergency via several means including:

- Fire Alarms
- Broadcasting over radios and televisions stations on campus, locally and in nearby cities, will be handled by the News Services/Media Relations Office (673-3323). Radio stations include, but are not limited to: WDOE; WBEN; WGR55; WYRK; and WCVF. Television stations include, but are not limited to WIVB; WGR; WKBW; WNYF; and TIME Warner Cable 8.
- Fax communications will be sent to all fax machines on campus by New Services/Media Relations.
- Custodians will be utilized to deliver information to occupants of their respective buildings.
- Via phone calls to individual faculty and staff.
- Pagers.
- Two-way radios.
- The College Information switchboard can be advised of the emergency and be available to answer or redirect phone calls that come in.
- Mass Notification System.
- NY Alert System.

University Police personnel will manually check the building where an emergency incident has reportedly occurred to ensure that all employees, students, and visitors have evacuated the building. Evacuated employees and students will leave their respective areas according to the Evacuation Plans posted throughout the campus (see Chapter 14). They will be provided with evacuation information as soon as possible.

12.2.1 Emergency Response Team

The University Police Dispatch Officer will notify all members of the Emergency Response Team of the incident via telephone or pagers. The University Police Dispatch Officer will maintain an up-to-date emergency call list of the response team, including their names, titles, extensions, home phone numbers, home addresses and office locations (see Chapter 9). The University Police Dispatch Officer will briefly inform each person notified of the following information (if available at that time):

1. The nature and location of the incident (type of chemical, amount, victims, etc.);
2. The level of the incident (I, II, or III);
3. The stage of the incident (what has happened, what is happening, what may happen);
4. Response from emergency teams, Incident Command reports and location of command post; and
5. Where to muster to form the EOC, if necessary.

12.3 PUBLIC INFORMATION SECTOR

News information is only released by the designated Public Information Officer. The release of this information is in accordance with SUNY Fredonia policies and pre-written procedures. News releases should be postponed until the EOC has been established and senior management approval has been given. Critical information that is immediately necessary for the evacuation, safety, and/or alerting of citizens should not be delayed until the EOC is established. News information should be coordinated with municipal press officials. As discussed in Chapter 9, the EOC staff will help choose a suitable safe location for the establishment of a Media Operations Center (MOC) which will serve as a briefing center.

12.3.1 Sample Emergency Message:

"At _____, emergency personnel at SUNY Fredonia were notified that there was a release of _____ from the _____.

All efforts are being made to control the release and minimize its impact on the nearby citizenry and environment. Local, State and Federal officials have been notified and precautionary actions are being taken.

Once normal operations have been resumed, further details will be released."

12.4 NOTIFICATION OF NEXT OF KIN

In the event of a serious injury or death from a chemical incident at SUNY Fredonia, the President, or his/her designee, will notify the next of kin as soon as possible. Names of those injured or killed will not be released to the media until confirmation is received that the next of kin has been notified.

12.5 ACCIDENT REPORT

In the event of a chemical release, University Police will fill out an incident report using the *SUNY Regulatory and Incident Report* form. See Figure 12-1. The report is kept on file with University Police with a copy distributed to the Director of EHS.

Figure 12-1: Incident Report Form

CS-14
C2203-681

STATE UNIVERSITY OF NEW YORK
SERVICE AND REGULATORY INCIDENT REPORT

1. Campus: 2b ____ ____
2. Report type: A) New B) Change C) Delete
3. Date of report: Mo. Day Year
4. File ID: Year No. Sequence
5. Area of activity: A) Safety Maint. B) Crear Maint. C) Aid & assist incap. person D) Calls for assistance E) Escort service F) Special assign. G) Animal H) Alarm-fire box I) Alarm-other J) Other (specify)
6. Name of recipient: (LAST, FIRST, MIDDLE)
7. Recipient of services: A) Single B) Multiple If multiple, number
Local address: Tel:
8. Recipient status: A) Patient B) Student C) Faculty/Staff D) Visitor E) Patrol Officer F) Other (specify)
9. Sex: A) Female B) Male
10. Date of birth: Mo. Day Year
Home address: Tel:
11. Nature of response: A) Emergency B) Prompt C) Routine
12. Additional personnel assistance rendered: A) Yes B) No - if yes, number
13. Name of reporter: (LAST, FIRST, MIDDLE)
14. Status of reporter: A) Faculty/Staff B) Recipient C) Patrol Officer D) Other (specify)
Address: Tel:
15. Did reporter witness incident: A) Yes B) No
16. Are there witnesses: A) Yes (names in narrative) B) No
17. General area of occurrence: A) Dorm B) Dining hall C) Student union D) Academic area E) Gym F) Admin. Bldg. G) Maint. area H) Road I) Parking lot J) Grounds K) Hospital L) Other (specify)
18. Specific area of occurrence: Room
19. Building code: Building Floor
20. Date of incident: Mo. Day Year
21. Time of incident: (use 24 hour clock) A) Actual B) Estimated C) Unknown
22. Incident: A) Job related B) Academic C) Athletic D) Other (specify)
23. If report of incident came through office, method: A) Person B) Phone C) Letter D) Other (specify)
24. When reported: Mo. Day Year Time
25. Radio dispatch: A) Yes B) No
26. Time of arrival at scene
Time scene cleared
27. The following agency responded to scene: A) Fire dept. B) Police dept. C) Ambulance D) Power company E) Other (specify)
28. Number of people involved if crowd or evacuation
29. Extent of evacuation: A) Partial B) Full
30. If auto involved: (use MV104A for motor vehicle accident) A) Failure B) Abandoned C) Lock out D) Other (specify)
31. Was auto towed: A) Yes, by campus B) Yes, other (specify) C) No
32. Personal property: A) Lost B) Found
33. Estimated value of property:
34. Does finder wish to file a claim for this property: A) Yes B) No
35. Finder's signature: Mo. DAY Year
36. Disposition of property: (Sec. 251-25A Personal Property Law) A) Return to owner B) Return to finder C) Other (specify)

NARRATIVE: Give a brief description of who, what, when, where, how, etc.

37. Were existing procedures adequate for response to incident: A) Yes B) No (if no, explain in narrative)
Report completed by: Title Date
38. Was physical plant notified of any unsafe conditions: A) Yes B) No C) None evident
Supervisor's signature: Title Date

13. EMERGENCY RESPONSE

This Chapter describes SUNY Fredonia's emergency response procedures to releases of hazardous and non-hazardous materials, and complies with 29 C.F.R. § 1910.120(q)(2)(ix); 40 C.F.R. § 264.52-56; and 6 NYCRR §§373-3.4(c)-(g).

13.1 GENERAL SPILL RESPONSE PROCEDURES

The following procedure will be followed in case of a chemical spill:

1. Upon discovery, the University Police Dispatch officer is informed of the situation.
2. The Dispatch officer dispatches a University Police patrol officer to investigate the situation and informs the FEC.
3. FEC assesses the situation and orders evacuation, if necessary.
4. FEC or Dispatch Officer requests for assistance from outside emergency responders, if necessary.
5. Restrict access to impacted and threatened areas.
6. Keep unprotected personnel upwind of spill area.
7. Avoid contact with spilled product.
8. Eliminate ignition sources that may be present.
9. Prevent product from entering sewers and confined spaces.
10. Consider potential mixing of incompatible materials.
11. Use explosion-proof and spark-proof equipment where necessary.
12. Determine if a reportable incident occurred and facilitate reporting as required.

13.2 HAZARDOUS SUBSTANCE SPILL RESPONSE

13.2.1 All Employees and Students

Immediately upon discovering that a spill (larger than 1 liter) has occurred or has the potential to occur, SUNY Fredonia employees and students have been trained to dial extension 3333 and advise the University Police Dispatch officer of the situation. The employee reporting the incident should provide as much information as possible regarding the type, nature and location of the spill. Some employees are trained to control small and incidental spills and leaks which result in "non-emergencies" or "Level I emergencies." SUNY Fredonia employees will protect life and minimize losses by evacuating and preventing entry into potentially dangerous areas.

13.2.2 University Police Chief

The University Police Chief or designated alternate will assume the responsibilities of FEC and will immediately assess reported situations. The assessment will evaluate:

- Nature and scope of problem.
- Steps necessary to protect life, health, environment, and facility operations.
- Whether outside emergency responders are needed.

The FEC will immediately determine the need for and extent of evacuation (if not already accomplished) by consulting with University Police personnel and other members of the Emergency Response Team listed in Chapter 9 of this ICP. If necessary, the University Police Dispatch officer, will notify outside emergency responders as described in Chapter 9.

13.2.3 Outside Emergency Response Contractors

Outside hazardous materials response teams called to provide emergency assistance to SUNY Fredonia will operate under their own emergency response plan and use their own personal protective equipment while at SUNY Fredonia.

13.2.4 Response Procedures

On receiving a call about an incident on campus, University Police will dispatch an officer to investigate the incident. If University Police determines that the incident could be characterized as a potential emergency, the University Police Dispatch Officer will notify all members of the Emergency Response Team. Facilities Management personnel, with the assistance of the Emergency Response Team and/or University Police, will quickly determine if they can safely and effectively mitigate the incident as a non-emergency. Certain trained employees are capable of addressing small releases (non-emergencies or Level I emergencies) by donning appropriate PPE and applying spill packs to stop small releases.

If the Emergency Response Team and/or University Police determine that the incident cannot be safely mitigated, the incident will be characterized as a Level II or Level III emergency and the FEC will immediately activate this ICP. The University Police Dispatch officer will contact the Fire Department and private response contractors and ask them to respond to the incident.

When the Fire Department and/or the outside emergency response team report to the site of emergency, one of the outside responder supervisors will assume the role of the IC and coordinate the response efforts between the various response parties. The FEC and SUNY Fredonia's Emergency Response Team will assist the external response teams and community officials, as necessary.

13.2.5 Medical

The Health Center has qualified individuals who can provide immediate medical attention during an emergency incident. Certified employees can administer First Aid, CPR, and other medical services to injured persons. Brooks Memorial Hospital is within close vicinity of SUNY Fredonia and can be reached within minutes for additional medical attention.

13.2.6 Containment

Trained SUNY Fredonia employees will respond offensively to chemical releases that are "non-emergencies" and to certain Level I emergencies; and defensively in case of Level II or III "emergency incidents." Under no circumstances are SUNY Fredonia employees allowed to attempt to control or contain the release in Level II or III "emergency incidents." Containment of Level II or III emergencies will be done by the Fredonia Fire Department and/or an outside response contractor.

13.2.7 Hazardous Substance Reportable Quantities

If a material is released to the ground, water or air which contains hazardous substances, the FEC or his designee will determine if the release exceeds an RQ listed in Table 2-1. If the release exceeds an RQ,

then telephone reports will be made immediately and follow-up written reports will be submitted as described in Chapter 17 of this Plan.

13.2.8 Clean-Up

The FEC will facilitate proper clean up after a spill has been contained by outside contractors and all threats to human life or the environment have been eliminated. The FEC will ensure all clean up and disposal activities are protective of human health, safety, and the environment, and comply with all applicable environmental laws.

13.2.9 Decontamination

The outside response contractor called on to respond to an emergency will be responsible for decontamination of the incident area. Decontamination waste, such as gloves, protective clothing and absorbent material will be classified as either non-hazardous or hazardous waste, and will be stored and disposed of in accordance with applicable federal, state, and local laws.

13.2.10 Notifications

The FEC or designee is responsible for reporting reportable incidents to appropriate regulatory and corporate parties. SUNY Fredonia's reporting procedures are described in detail in Chapter 17.

13.2.11 Investigation and Critique

SUNY Fredonia will conduct an investigation into the cause of all spills, the emergency response, and the corrective action needed to prevent a repeat incident. Investigation procedures are described in Chapter 18 of this plan. If this ICP fails for any reason, it will be amended.

13.3 NON-HAZARDOUS MATERIAL SPILL RESPONSE

Immediately upon recognizing that a spill of non-hazardous material has occurred or has the potential to occur, the University Police Dispatch officer will be called at extension 3333. The caller should describe the location, nature and type of material involved in the spill. University Police will dispatch an officer to the incident site. University Police will evaluate the situation and determine if it can be mitigated as a non-emergency. The operating and maintenance personnel will be responsible for containment and clean up of the release. The Emergency Response Team will be notified and they will carry out an investigation and critique of the incident designed to help prevent reoccurrence.

Oil spills should be handled in accordance with the General Oil Spill Response Procedures outlined in Figure 13-1.

13.4 FIRE EMERGENCY

As described above, when the fire alarm system is from anywhere on campus, a call rings into the main Simplex alarm panel located in the University Police Dispatch Office. The University Police Dispatch officer, in turn, notifies the Fredonia Fire Department. The University Police Dispatch officer will also monitor the radio traffic and send a University Police officer to investigate the incident as is appropriate.

Red Emergency Response Quick Reference Flip Charts are posted throughout the SUNY Fredonia campus. These Quick References concisely outline steps that SUNY Fredonia students and staff should take in the event of power/utilities failure; weather emergency; crime in progress; fire and/or smoke; chemical spill or release; employee/student injury or death; building evacuation; and explosive devise or bioterrorism threat.

Figure 13-1: General Oil Spill Response Procedures

The following basic oil spill response procedures should be followed for all spills (some activities occur simultaneously):

- Report incident to the University Police Dispatch officer at extension 3333. Dispatch will notify the Oil SPCC Coordinator.
- The Oil SPCC Coordinator will gather all relevant information and summon outside assistance as necessary.
- The Oil SPCC Coordinator will also determine if a reportable release has occurred, and facilitate reporting as required by county, state, or federal law. (See Chapter 17)
- If the oil clean up will be conducted by SUNY Fredonia personnel, the following general procedures should be followed:
    - Eliminate ignition sources that may be present.
    - Avoid contact with spilled product.
    - Stop the source of the release if it is safe to do so.
    - Contain the released oil with absorbent materials.
    - Prevent released material from entering sewers, water bodies, and confined spaces.
    - Restrict access to impacted and potentially threatened areas.
    - Keep unprotected personnel upwind of spill area.
    - If spill occurs on an unpaved area, remove and dispose of all contaminated soil in accordance with applicable rules.
    - Choose clean-up equipment, where possible, that will not be corroded or otherwise damaged by the spilled product. Use explosion-proof and spark-proof equipment, where necessary.
    - Ensure recovered spill material is collected, containerized, labeled, properly characterized, and disposed of in accordance with all applicable requirements.

14. EVACUATION ROUTES, SAFE DISTANCES, AND PLACES OF REFUGE

This section identifies primary and alternate internal evacuation routes, emergency shut down procedures, evacuation muster points, headcount procedures, safe distances, places of refuge, and shelter-in-place procedures. It also identifies the steps SUNY Fredonia takes if areas outside the campus could be impacted by an emergency event at SUNY Fredonia. This section complies with the requirements of 29 C.F.R. § 1910.120(q)(2)(iv) and (vi); and 6 NYCRR §373-3.4(c)(6).

14.1 POTENTIAL CAUSES FOR EVACUATION

SUNY Fredonia uses certain chemicals that, if released or spilled in large quantities, could require partial or total evacuation of the college. In addition, other events may also require partial or total building or campus evacuations. These substances and/or events include, without limitation: (1) a large release of a hazardous chemical; (2) a fire; (3) severe weather; (4) a bomb threat; or (5) biological hazard.

The purpose of this section is to ensure a safe, orderly evacuation of SUNY Fredonia employees, students, visitors, and contractors and to coordinate the evacuation of citizens with local authorities in the event of a hazardous materials emergency. When an uncontrolled release of a toxic substance becomes a threat to the lives and safety of people, protective actions must be taken. These actions may include isolation, evacuation and/or protection in-place, depending upon the critical incident factors involved.

14.2 EVACUATION PROCEDURES

The decision to evacuate all or part of the college will be made by the FEC, or his/her designee, in conjunction with approval from the President. If there is an immediate threat to lives, the On-Scene Incident Commander may order an evacuation.

In the event of a building evacuation, SUNY Fredonia students and personnel should follow the procedure listed in the red Emergency Response Quick Reference Flip Charts posted throughout the campus:

1. Evacuate the building immediately (refer to Building Evacuation Plan if available). If others do not respond to the alarm or do not know of the evacuation, inform them of the need to evacuate immediately.
2. Upon evacuation, do not stop to take any belongings, etc. from the building. Use stairways and not elevators.
3. When out of the building, stay at a safe distance from the building and out of the way of emergency personnel.
4. If you suspect that anyone is still inside the building, notify the authorities at the scene.
5. Stay upwind from smoke or chemical clouds.
6. Stay a safe distance from the building unless told to reenter or receive other directions from authorities on site.
7. Stay with classmates, fellow Fredonia employees, etc. so that a head count may be taken.
8. Follow any further directions authorities on site might give.

Transportation may be by SUNY Fredonia vehicles.

Alerting and warning procedures and site security and control policies are provided in Chapters 12 and 15, respectively. University Police personnel will take action based on directions from the EOC and/or the Incident Commander. If necessary, the University Police Dispatch Officer will give evacuation notices by phone, radios, pagers, or individual contact as the situation warrants. University Police personnel will check the incident site and make sure everyone has evacuated. A decision to evacuate the college may cause specifically trained employees to properly shut down certain operating equipment, according to established departmental procedures and for employees, visitors, and contractors to leave the college quickly and safely.

14.3 EVACUATION ROUTES

If a college-wide evacuation is necessary, which is extremely unlikely, the employees and students will follow the directives issued by the Incident Commander. In the event of a mass evacuation of the college, it is estimated that between 3,000 and 3,500 persons will be moved to designated points. This will cause a serious traffic problem. The College University Police under the Police Chief, assisted by the Vice President for Administration and staff assigned by the College President, would supervise the evacuation.

The following are suggested buildings to house the evacuees if the half-mile radius is declared safe:

Location	Number of People
Fredonia High School	1,000
Wheelock School	300
St. Joseph's School	100
St. Anthony's School	100
American Legion	100
BOCES	400
Subtotal	2,000
St. Anthony's Recreation Building	200
Village Hall	50
Masonic Building	400
Grange Hall	100
Methodist Church	100
Baptist Church	100
Subtotal	950
TOTAL	3,150

Alternative sites would be:

- The National Guard Building in Dunkirk. This would require the County Emergency Management and Civil Defense Director obtaining permission from the Governor.
- Entire Dunkirk School System. Contact School Superintendent. School phone is 716-366-9300.
- Silver Creek School, Cassadaga Central School System. (Plans for use of all school facilities are now being developed by the County Emergency Management & Civil Defense Director and the Red Cross).

All evacuation centers would mostly provide only temporary shelter until the emergency is over. Meals would be the responsibility of the Red Cross.

14.4 INTERNAL SHELTERING FOR SUNY FREDONIA EMPLOYEES, STUDENTS, AND VISITORS

This section outlines the internal sheltering procedures for SUNY Fredonia employees and students. This strategy may be necessary whenever the Incident Commander or the EOC recognize that people cannot be safely evacuated from an area. Employees and students are instructed to take shelter where they are located and follow these procedures (if necessary):

1. Close all doors and windows;
2. Shut down air conditioners and fans;
3. Lower thermostat setting to minimize air intake;
4. Seal off windows and doors if necessary; and
5. Stay in place and await additional information.

14.5 EXTERNAL EVACUATION

The recommendation to evacuate citizens beyond the college boundaries should be made by Town or County officials when an outside responder determines when there is an immediate or potential threat to the community. The local authorities, emergency responders and elected or appointed officials make final evacuation decisions and dictate evacuation procedures.

14.5.1 Protection in Place

In the event of a hazardous materials emergency that may adversely affect the lives and safety of the local citizens, the Incident Commander may recommend to local authorities not to attempt to evacuate citizens, but instead to notify citizens of proper protection in place procedures, as previously outlined. Local authorities shall make the final decision upon this recommendation and act accordingly.

14.5.2 Sheltering Following Evacuation

In the event of a chemical release which requires any evacuation of community, citizens will be relocated to a safe location outside the threatened area. The Fredonia Fire Department will implement the Area Emergency Plan and assist citizens in evacuation.

14.5.3 Post Emergency Re-Entry

Decisions to allow the return of citizens to evacuated communities are made by local officials and community emergency responders.

15. SECURITY AND CONTROL

This section describes the routine security measures SUNY Fredonia implements to protect SUNY Fredonia employees and students, and the security measures SUNY Fredonia implements during an emergency to ensure the protection of human health, the environment and property. This section meets the requirements of 29 C.F.R. § 1910.120(q)(2)(v); and 40 C.F.R. § 112.7(g).

15.1 ROUTINE SECURITY MEASURES

The University Police Dispatch office is manned 24 hours a day, 7 days/week. At least one University Police officer is always available to investigate an incident. University Police officers conduct regular rounds of the college campus.

Most University buildings are locked at night. Fredonia provides adequate facility lighting in oil storage areas to discover spills and prevent vandalism.

15.2 SECURITY MEASURES IMPLEMENTED DURING EMERGENCY INCIDENTS

During an emergency incident, the responding team establishes control zones around the affected area(s). The purpose of setting up control zones is to minimize the potential adverse impact of the incident on employees, students, visitors, citizens, responders, the environment, and property.

The initial responder to an incident will use individual experience, training and awareness to begin isolation and evacuation of the affected areas. This person will also make the required internal notifications, according to emergency procedures, so that higher trained or additional responders will be summoned. These individuals will also take needed actions to ensure everyone's safety. This begins by establishing initial control zones (i.e. hot, warm, and cold).

Upon notification that a hazardous materials emergency exists within the college, the first trained responder will establish the control zones and designate other employees to assist with evacuations or perimeter security. As more qualified responders arrive, control zones will be modified to meet the needs of existing situation.

15.2.1 Establishing Control Zones

The IC, in conjunction with other members of the response team, will immediately designate three major zones around the affected area for all emergencies. These zones serve to reduce the risk to personnel and equipment by controlling and directing tactical operations. Personnel will move through access control points only. Each zone is described below.

15.2.2 Hot Zone (Exclusion Zone)

This is the area of most concern. Access into this area may be permitted only by trained responders with the use of proper PPE and the buddy system. All other Standard Safety and Operating Procedures will be adhered to for Hot Zone operations. The Hot Zone will extend far enough to prevent adverse effects from hazardous materials. Only those responders necessary to control the incident or rescue others may enter this area.

15.2.2.1 Warm Zone (Contamination Reduction Zone)

The Warm Zone is an area of limited access. The purpose of the warm zone is to reduce the spread of contamination and control access to and from the Hot Zone. It also serves as a buffer zone and, at least initially, is not contaminated. Contamination in this Zone should remain in the Decontamination Corridor, which is also located in this Zone. Entry and exit from the Hot Zone will always be accomplished through the Decontamination Corridor which will be controlled and secured. PPE may be required in this area. The size of this zone will be determined by the nature of the incident and the size of the decontamination operations to be conducted within. The IC, in conjunction with the responding Response Team, will determine the zone locations for each emergency.

15.2.2.2 Cold Zone (Support Zone)

The Cold Zone is the area which borders the outer perimeter of the Warm Zone and is a clean area set up for support operations. It will be upwind and uphill, if possible, from the Hot and Warm Zones and as far away from the Hot Zone as necessary for safe operations. The IC Command Post will usually be located in this area. This zone will have a secure outer boundary.

15.2.3 Identifying Control Zones

Control zones will be defined based on results of sampling, monitoring, and/or visual incident investigation. If monitoring instruments are not immediately available, the response team will use physical data and chemical information to determine the safest zones. Extended zones may be necessary until the zones are accurately defined. The criteria for establishing zone boundaries include:

- Visual survey and investigation of the incident.
- Location and types of hazardous materials and other hazards in the area.
- Analysis of data on physical and chemical properties of hazardous materials involved.
- The ability to safely access the contaminated area.
- Area necessary for the control zones to be effective.
- Current and anticipated weather conditions.
- Number of personnel available to properly control these zones.
- Number of injured persons and potential exposure of personnel and the public.

15.2.4 Securing Control

Once the Control Zones have been determined, they will be clearly marked. This may be done by using hazard tape, rope, warning cones, or by any other effective means. Personnel will then be strategically placed around the perimeter of the Cold Zone and, if necessary, the Warm Zone to restrict access by unauthorized personnel. Personnel chosen for this job may not have completed formal emergency response training. However, they will be briefed on site safety policies and hazard exposure information.

15.3 SECURITY FOR OIL STORAGE FACILITIES

While the oil storage facilities are not necessarily fenced, the security measures described in Section 15.1 and in this section provide equivalent protection. The pumps for the diesel and gasoline USTs are accessible only to authorized personnel. Tank fill ports are capped and locked when tanks are not being

filled. Most of the 55-gallon drums of oil are located indoors. Flow and drain valves that discharge out are maintained in a closed position when not is use and either require a tool to open them or are located in areas accessible to only authorized personnel. Oil pump starter controls are maintained in the "off" position and accessible only to authorized staff.

16. DECONTAMINATION PROCEDURES AND POLICIES

OSHA defines decontamination as "the means of removal of hazardous substances from employees and their equipment to the extent necessary to preclude the occurrence of foreseeable adverse health affects." 29 C.F.R. § 1910.120(a)(3). This section describes the policies and procedures to be used whenever decontamination is necessary during emergency response operations involving hazardous material at SUNY Fredonia. See 29 C.F.R. § 1910.120(q)(2)(vii). It also defines when decontamination is necessary. SUNY Fredonia has a "No Exceptions" Decontamination Policy.

16.1 IMPORTANCE OF DECONTAMINATION

Practicing proper decontamination procedures both during and after a hazardous materials incident helps prevent unnecessary personnel exposure to hazardous materials and reduces the potential spread of the material involved. The benefits of conducting proper decontamination are critical and cannot be over-emphasized.

Contamination of personnel and equipment, even with strict safety practices, may occur. A plan to decontaminate is necessary and must be operational before any entry is made into an environment that may pose hazardous material hazards.

16.2 DECONTAMINATION POLICIES

16.2.1 General Policy

This policy applies to all responses to hazardous materials incidents and whenever people or resources are, or may be, contaminated. The policy is as follows:

1. Decontamination operations will be established before entry into the "Hot Zone" (defined in Chapter 15) is allowed. A gross emergency decontamination for quick response may be acceptable to accommodate a quick entry into the Hot Zone, until more definitive decon is set up.
2. All personnel and equipment that have entered the Hot Zone will be decontaminated.
3. Personnel and equipment that have entered the Decontamination Corridor, either during or after decontamination operations have occurred, will be decontaminated.
4. All personnel or equipment suspected of being contaminated will be decontaminated.
5. Injured personnel will be decontaminated according to SUNY Fredonia's Medical Decontamination provisions (described below).
6. The IC or Safety representative will research the suspected contaminants thoroughly to identify the appropriate decontamination method(s) to use. This research will also be used to choose the correct PPE for decon workers.
7. The "Decontamination Corridor" will be established and clearly identified. It will be located in the Warm Zone (defined in Chapter 15) and all decontamination activities will take place there.
8. Contamination prevention is as important as decontamination and all responders will do everything possible to avoid exposure and prevent contamination spreading.
9. All decontamination personnel will wear appropriate PPE, as identified by the IC or FEC.
10. A "Decontamination Officer" may be appointed for all decontamination operations. The responsibilities of a Decontamination Officer include:

a. Reporting to the IC

b. Establishing and controlling the contamination reduction corridor

c. Safety of all decon personnel and others who enter the Decon Corridor

d. Coordinating activities with others

e. Determining the method and type of decontamination necessary

f. Briefing and debriefing everyone about decontamination procedures

16.2.2 Medical Decontamination Policies

SUNY Fredonia's policies for decontaminating injured or exposed personnel during a hazardous materials incident are as follows:

16.2.2.1 Physical Injury

Some physical injuries are minor and may be appropriately treated by trained on-site medical responders at the scene, while other injuries may require more advanced medical treatment. Trained medical responders are capable of making these decisions. Medical personnel capable of providing basic life support (BLS), will be present at all hazardous materials incidents.

Potentially life-threatening injuries will be treated immediately, possibly without considering decontamination. If the injured person's life is in jeopardy, some form of decontamination may be possible with the initial first aid treatment, if the decontamination does not delay the first aid treatment. Some basic decontamination practices which may be utilized include:

1. Protect yourself from the contaminant by using PPE and or avoiding contamination on or around the injured person, if possible.
2. Carefully remove respirators and PPE from the injured person.
3. If protective clothing or suits cannot be removed easily, they may be cut off.
4. Removal of contaminated clothing and equipment should not delay first aid treatment.
5. Washing of PPE worn by the injured persons may be effective if it will not cause further harm.
6. Injured persons may be placed in body bags, plastic, or other materials to avoid spreading the contamination when it is not possible to thoroughly decontaminate the injured persons or the PPE.
7. Medical personnel and facilities will be advised immediately whenever an injured person is being transported or cared for and has not been thoroughly decontaminated. Medical personnel will be advised of the chemical to which the person was exposed, the chemical's properties, hazards, known antidotes and specialized treatment, and other pertinent information. A copy of the MSDS or an uncontaminated label from the container will be given to medical personnel and another faxed to the treating facility.

16.2.3 Hazardous Materials Exposures

Exposure to hazardous materials may cause several different types of injuries. For example, hazardous materials may cause thermal burns, frostbite, chemical burns, poisoning, asphyxiation, radiation

poisoning, and death. Mixtures of chemicals create unknown hazards and risks. Immediate medical attention and definitive treatment at a medical facility are required for all exposed persons. If it is possible to perform thorough decontamination before treatment or transport without jeopardizing the welfare or life of the injured person, it should be done immediately by the best possible method. The same precautions should be taken as outlined above under "Physical Injury."

16.2.4 Decontamination Procedures

Each incident may require different decontamination operations. The nature of the incident, chemical, weather, temperature, number of people to be decontaminated, and number of trained personnel available are a few of the factors which dictate the method, size, and type of decontamination operation that will be required.

Basic decontamination procedures are described below. These steps may be utilized for most incidents, unless an extremely hazardous substance is involved, which may require a more sophisticated operation and more personnel. Basic decontamination steps and procedures that may be useful include:

1. Covering the Decontamination Corridor with plastic and placement of booms or dikes to control runoff from decon operations.
2. Use collection pools to hold decontamination water runoff.
3. Demarcate the Decon Corridor with tape, cones, ropes or other markers.
4. Have a segregated equipment drop at the edge of the Hot Zone for contaminated equipment. This equipment can be re-used in the Hot Zone without decontamination.
5. Have an initial or "primary" decontamination wash and rinse as the first step near the Hot Zone to wash the most significant contamination off of PPE.
6. Have a secondary wash and rinse approximately 15 to 20 feet away, if possible, from the first wash to ensure thorough decontamination of PPE.
7. Have a clean area either before or after the secondary wash to change Self Contained Breathing Apparatus ("SCBA").
8. A large area near the Cold Zone (defined in Chapter 15) end of the Decon Corridor should be established to remove chemical suits, respiratory equipment, and other items.
9. Demarcate a clean (uphill) side and a dirty (downhill) side of the Decon Corridor. The clean side should be used to pass uncontaminated supplies and equipment into the Warm Zone, while the dirty side contains all of the contaminated equipment and supplies used or removed during decontamination operations.
10. All used equipment and supplies, or contaminated items, should remain in the Decon Corridor until it can be determined if these items can be decontaminated.
11. All contaminated items must be disposed of in accordance with applicable laws.

16.3 DECONTAMINATION OF EQUIPMENT

Immediately after a hazardous material release at or from SUNY Fredonia, the Director of EHS facilitates the appropriate treatment, storage, and disposal of recovered waste, contaminated soil and surface water, and any other material that results from a release, fire, or explosion. See 6 NYCRR §373-3.4(g)(7). If the recovered material is hazardous waste, SUNY Fredonia will handle the material in accordance with applicable federal and state hazardous waste rules.

In addition, the Director of EHS will ensure that in affected areas of SUNY Fredonia: (1) no waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and (2) all emergency equipment listed in this ICP is cleaned and fit for its intended use before operations are resumed. See 6 NYCRR §373-3.4(g)(8). SUNY Fredonia will determine if waste generated during an emergency is hazardous waste and retain records of that determination.

17. NOTIFICATION PROCEDURES FOR FEDERAL, STATE AND LOCAL OFFICIALS

This Chapter identifies the hazardous materials covered by this ICP (see Table 2-1) and lists applicable reportable quantities (RQs), in pounds and/or gallons (for liquids), for those materials that have RQs. This Chapter also describes how SUNY Fredonia notifies federal, state, and local agencies regarding reportable releases at or from SUNY Fredonia, and fatalities, hospitalization of three or more employees, and satisfies the requirements of 6 NYCRR §§ 595.3, 613.8; 42 U.S.C. §§ 9603 and 11004; 40 C.F.R. §§ 302.6 and 355.40; 49 CFR §§171.15 and 171.16; and 29 C.F.R. § 1910.04.

This Chapter describes the following notification requirements:

- Hazardous Material Releases greater than or equal to RQ:

  Immediate Oral Notifications

  Written Notifications
- Hazardous Material Releases that leave facility boundary
- Oil Spills:

  Immediate Oral Notifications

  - Oil Releases to Water
  - Oil Releases to Land

  Written Notifications
- DOT Accident and Release Notification

  Oral Notification

  Written Notification
- Reporting of Fatality or Multiple Hospitalization Incidents

17.1 DETERMINATION OF REPORTABLE QUANTITIES

The RQs for the hazardous materials listed on Table 2-1 were determined in accordance with 40 C.F.R. §§ 302.4, 302.5, and 302.6; and 6 NYCRR § 597. Where a product or mixture appearing on Table 2-1 contains more than one hazardous constituent, all hazardous constituents and corresponding RQs are listed, and the lowest applicable RQ is identified. 40 C.F.R. § 302.6(b)(1); 40 C.F.R. § 302.5(a).

If SUNY Fredonia does not know the hazardous constituents contained in a product or waste, or if a product or waste contains no listed hazardous substances, but would be classed as a characteristic hazardous waste if released, the RQ applicable to the type of hazardous waste released is provided in Table 2-1. Some laboratories at SUNY Fredonia have chemicals in small quantities that might exceed the RQ, if spilled. These chemicals are also listed in Table 2-1. Any time there is a spill of a chemical in the lab, the appropriate Science Department Lab Manager will check Table 2-1 and if any RQs are exceeded, appropriate notifications will be made as described in this chapter.

In developing Table 2-1, SUNY Fredonia relied on information contained in manufacturers' material safety data sheets ("MSDSs") and/or process knowledge. 29 C.F.R. § 1910.1200(d).

17.2 RELEASE REPORTING

As soon as SUNY Fredonia has knowledge that there has been a release to the environment that equals or exceeds an applicable RQ in any 24-hour period, it immediately reports the release to all appropriate agencies. 40 C.F.R. § 302.6(a). SUNY Fredonia defines immediately to mean within one hour of becoming aware of the exceedance, unless reporting within this time frame would compromise the response effort. If the response effort would be compromised, SUNY Fredonia will report as soon as practicable.

There are many hazardous materials present on-site in quantities that are less than applicable RQs. If any of these materials are released, they will be addressed in accordance with this ICP. However, these releases would not be reported to outside agencies unless circumstances require reporting (e.g., outside assistance or emergency treatment is needed).

It is the responsibility of the FEC or his/her designee to ensure all regulatory agencies are notified, when notification is required by law. The decision to issue warnings to local citizens regarding a chemical release is the responsibility of local officials and public safety departments of the affected communities. SUNY Fredonia will assist potentially impacted communities in a concerted effort to minimize exposure and maintain the safety of the community.

17.3 DETERMINING REPORTABLE RELEASES UNDER NEW YORK SPILL REPORTING LAWS

Pursuant to New York law, SUNY Fredonia reports the following hazardous substance releases:

17.3.1 Releases Exceeding Reportable Quantities.

The release of a state hazardous substance to air, water or land in excess of a state RQ in any 24-hour period is reported to the New York State Department of Environmental Conservation (NYSDEC) (1-800-457-7362) within two hours by the FEC, or his/her designee. See 6 NYCRR § 595.3. Table 2-1 lists applicable state RQs for hazardous substance releases to air, land or water for those substances SUNY Fredonia has on-site in quantities exceeding RQs.

17.3.2 Releases Less than Reportable Quantities.

A release of any NYSDEC-listed hazardous substance will be reported to the NYSDEC within two hours, regardless of the quantity, if:

1. The release has caused or could reasonably be expected to cause a fire that has the potential to impact off-site areas; or
2. The release has caused or could reasonably be expected to cause an explosion or a violation of air or water quality standards; or
3. The release has caused or could reasonably be expected to cause an illness or injury to people, not including persons in the building where the release occurred; or
4. Runoff from fire control or dilution waters may contribute to a contravention of water quality standards.

See 6 NYCRR § 595.3(a)(2).

17.3.3 Suspected or Probable Spills

A suspected or probable hazardous substance release must be reported (within 24 hours) unless further investigation shows that an actual release has not occurred or that the release does not have to be reported (e.g., spills of less than a RQ). See 6 NYCRR § 595.3(b).

The following are examples of "suspected" or "probable" spills that must be reported to NYSDEC within 24 hours of discovery:

1. Test, sampling, or monitoring results from a release detection method indicate that a release may have occurred.
2. Unusual operating conditions such as the erratic behavior of product dispensing equipment, the sudden loss of product from a storage tank, an unexpected presence of water in a tank, or the physical presence of a hazardous substance or an usual vapor level that is of unknown origin.
3. Impacts to the surrounding area, such as evidence of hazardous substances or resulting vapors in soils, basements, sewer and utility lines, and nearby surface waters.
4. Any other conditions or indications of a suspected release.

17.4 NOTIFICATION PROCEDURES

17.4.1 Hazardous Substance Spill Reporting.

If a reportable release (e.g. a release to the environment above an RQ) of a hazardous substance occurs (see Table 2-1), the FEC, or his/her designee, will report the incident within 2 hours (or as soon as possible for a federally reportable release) to:

5. 1. Fredonia Fire Dept. 911
6. 2. NYSDEC 1-800-457-7362
7. 3. National Response Center 1-800-424-8802

17.4.1.1 Information Required

When a spill incident is reported by telephone, the caller will provide the following information:

1. Time and date of spill.
2. (Probable) source of spill.
3. Location of spill:
   a. Water body
   b. Village, town, county
   c. Street address
4. Is there a health and/or fire hazard?
5. What was spilled?
6. How much was spilled?
7. Action being taken to contain the spill.

8. Personnel on scene.
9. Who else has been notified?

If an emergency incident involves incompatible waste, the FEC, or his/her designee, will ensure that such waste is not stored, treated, or disposed prior to the completion of cleanup procedures and all emergency equipment is cleaned and fit for its intended use prior to the resumption of facility activities.

Depending on the nature of the release, the NYSDEC may require a follow-up written report be submitted that describes how the release occurred, identifies corrective actions that have taken place, and describes procedures that have been implemented to prevent a release from occurring again (e.g. regular inspections, training).

17.5 HAZARDOUS MATERIAL RELEASE THAT LEAVES FACILITY BOUNDARY

If a hazardous material release (greater than or equal to RQ) leaves or threatens to leave the boundaries of the facility, the FEC or his/her designee will immediately notify the New York State Emergency Response Commission (SERC) at 518-402-9543 and the Chautauqua County Local Emergency Planning Committee (LEPC) 716-363-4341. 40 CFR §355.40 (b).

17.6 OIL SPILLS

17.6.1 Immediate Oral Notifications for Oil Spills

17.6.1.1 Oil Releases to Water

If petroleum product is released to water, the FEC or his/her designee will immediately report the incident to:

1. NYSDEC 800-457-7362
2. National Response Center ("NRC") 800-424-8802

   The NRC Operator will notify, as appropriate, the U.S. Coast Guard and EPA Region 2.

The following information must be provided to the NRC when reporting oil discharges to water:

- Exact address or location and phone number of the facility;
- Date and time of the discharge and the type of material discharged;
- Estimates of the total quantity discharged and the quantity discharged to surface water;
- Source of the discharge;
- Description of all affected media;
- Cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- Names of individuals and/or organizations who have also been contacted.

17.6.1.2 Oil Release to Land

All oil spills to land must be reported to DEC at 800-457-7362 immediately (within two hours of spill), unless the spill meets all of the following criteria[6]:

1. The spill is known to be less than five gallons;
2. The spill is contained and under the control of the spiller;
3. The spill has not and will not reach the State's water or any land; and
4. The spill is cleaned up within two hours of discovery.

Further, if SUNY Fredonia has reason to believe that a tank is leaking oil, DEC will be notified within two hours. See 6 NYCRR § 613.8.

17.6.2 Written Notification for Oil Spills

If SUNY Fredonia (1) discharges more than 1000 gallons of oil into or upon navigable waters or adjoining shorelines in a single spill event; or (2) discharges oil in harmful quantities (as defined in 40 C.F.R. Part 110) into or upon navigable waterways or adjoining shorelines in two spill events within any twelve month period, it will file a written report with U.S. EPA Region II within 60 days from the time either (1) or (2) occurs. 40 C.F.R. § 112.4(a).

A harmful quantity of spilled oil is defined as an amount that would meet one of the following criteria:

1. Violation of applicable water-quality standards;
2. Production of a film, sheen or discoloration on the water surface or adjoining shoreline; or
3. Deposition of a sludge or emulsion beneath the water surface or upon the adjoining shoreline.

See 40 C.F.R. Part 110.

This written report will contain the following information:

1. The name of the facility;
2. The name(s) of the facility's owner(s)/operator(s);
3. The facility's location;
4. The date and year when the facility began operations;
5. The facility's maximum oil-storage or handling capacity, and the normal daily quantity of throughput;
6. A description of the facility, to include site maps, topographical maps and flow diagrams;
7. A complete copy of the ICP and any revisions;
8. The cause(s) of the spill, including a failure analysis of the system or subsystem responsible for the spill;

[6] See New York DEC Technical Field Guidance: Spill Reporting and Initial Notification Requirements.

9. The corrective actions/countermeasures undertaken, including an adequate description of equipment repairs/replacements;
10. Additional preventive measures implemented or contemplated to minimize the potential for recurrence; and
11. Any other information that the Regional Administrator may reasonably require that is pertinent to the ICP or spill.

The report should be sent to:

EPA Region 2
Attn: Oil SPCC Coordinator
2890 Woodbridge Avenue
Building 209 (MS211)
Edison, NJ 08837-3679

40 CFR §112.4(a).

17.7 DOT ACCIDENT AND RELEASE NOTIFICATION

SUNY Fredonia immediately reports releases of listed "hazardous material" that occur during transportation (transportation is defined to include: moving property, loading or unloading, or storage incidental thereto) to U.S. DOT at 800-424-8802 when any of the following occur as a result of the hazardous material:

1. Someone is killed;
2. Someone receives injuries requiring hospitalization;
3. The general public evacuates for one hour or more;
4. One or more major transportation arteries or facilities close or shut down for one hour or more;
5. The operational flight pattern or routine of an aircraft is altered;
6. Fire, breakage, spillage, or suspected radioactive contamination occurs involving a radioactive material;
7. Fire, breakage, spillage, or suspected contamination occurs involving an infectious substance other than a regulated medical waste;
8. A marine pollutant is released in a quantity exceeding 119 gallons of liquid, or 882 lbs of solid;
9. A situation exists (e.g., continuing danger to life exists at the scene) that in the facility's judgment should be reported to the NRC; or
10. During transportation by aircraft, a fire, violent rupture, explosion or dangerous evolution of heat (*i.e.* an amount of heat sufficient to be dangerous to packaging or personal safety to include charring of packaging, melting of packaging, scorching of packaging, or other evidence) occurs as a direct result of a battery or battery-powered device.

This reporting is in addition to all other required reports described in this Section.

When SUNY Fredonia reports an incident to DOT, it provides the following information:

1. Name of the reporter;
2. Name and address of the carrier;

3. Phone number where reporter can be contacted;
4. Date, time and location of incident;
5. Extent of injuries, if any;
6. Classification name and quantity of the hazardous material involved, if available; and
7. Type of incident, nature of hazardous material involved, and whether a continuing danger to life exists at the scene.

If SUNY Fredonia must obtain chemical-specific information regarding chemical spills which occur during transportation, it calls CHEMTREC (Chemical Transportation Emergency Center) at 1-800-424-9300.

17.7.1 Written Report

Whenever SUNY Fredonia orally reports a hazardous material incident to DOT it also files a written report, in duplicate, on DOT Form F 5800.1 (Appendix E) within 30 days of the date the transportation incident was discovered. In addition, a written report will also be filed with DOT whenever one of the following situations occurs:

- An unintentional release of a hazardous material or the discharge of any quantity of hazardous waste;
- A specification cargo tank with a capacity of 1,000 gallons or greater containing any hazardous material suffers structural damage to the lading retention system or damage that requires repair to a system intended to protect the lading retention system, even if there is no release of hazardous material;
- An undeclared hazardous material is discovered; or
- A fire, violent rupture, explosion or dangerous evolution of heat (*i.e.,* an amount of heat sufficient to be dangerous to packaging or personal safety to include charring of packaging, melting of packaging, scorching of packaging, or other evidence) occurs as a direct result of a battery or battery-powered device.

Written reports are sent to the:

Information Systems Manager
PHH–63
Pipeline and Hazardous Materials Safety Administration
Department of Transportation
Washington, DC 20590–0001

or an electronic Hazardous Material Incident Report:

Information System Manager
DHM–63
Research and Special Programs Administration
Department of Transportation
Washington, DC 20590–0001 at http://hazmat.dot.gov

SUNY Fredonia keeps a copy of all written reports filed with DOT for at least two years.

17.8 REPORTING OF FATALITY OR MULTIPLE HOSPITALIZATION INCIDENTS

Within eight hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees as a result of a work-related incident, SUNY Fredonia orally reports the fatality/multiple hospitalization by telephone to the New York State Department of Labor, Public Employee Safety and Health (PESH) Bureau at (518) 457-5508. Oral notification is also made if a fatality or hospitalization of three or more employees occurs within thirty (30) days of an incident. However, if SUNY Fredonia does not learn of a reportable incident at the time it occurs and the incident would otherwise be reportable under either of the scenarios described above, SUNY Fredonia will report the incident within eight hours of the time the incident is reported to any SUNY Fredonia agent or employee. 29 CFR §§1904.8(a) and (b).

Such notifications will relay the following information:

- SUNY Fredonia's name;
- location of incident;
- time of incident;
- number of fatalities or hospitalized employees;
- contact person and telephone number; and
- brief description of incident.

29 CFR §1904.8(c).

18. INCIDENT TERMINATION, CRITIQUE AND FOLLOW-UP REPORT

This Chapter describes SUNY Fredonia's incident termination procedures, critique, and follow-up report and satisfies the requirements found at 29 C.F.R. § 1910.120(q)(2)(ix).

18.1 INCIDENT TERMINATION POLICY

When a spill or release no longer poses any threat to life, the environment, or property, the IC will announce termination of the emergency phase of the incident. This decision may be based on input from the other outside emergency responders. When determining whether an emergency has ended, the IC will consider:

1. Remaining potential threat to human health and the environment;
2. Whether the incident has ceased or is under control;
3. Whether it is safe for workers to enter evacuated areas; and
4. The presence or availability of cleanup crews.

Formal termination procedures will follow all emergency incidents. These procedures include three steps: Debriefing, Post Incident Analysis, and Critique. If a hazardous waste cleanup operation is necessary, then SUNY Fredonia will facilitate appropriate action. SUNY Fredonia personnel may not be qualified to re-enter the Hazard Sector to conduct clean-up operations. If the incident becomes an emergency again by posing a revived threat to people, the environment, or property, an emergency can be re-declared. Clean-up operations that are conducted as part of the emergency phase to help mitigate the incident can only be performed by properly trained and equipped personnel.

18.2 INCIDENT TERMINATION PROCEDURE

Formal termination is important because it provides a vehicle to ensure that there are no additional hazards remaining and the area is safe for re-entry. Information for incident reports and documentation can be collected and evaluated during the termination phase. Formal termination provides a good incident overview, which allows positive change to occur. All hazardous materials emergencies at SUNY Fredonia will be properly terminated according to the three-step termination procedure described here. Each step has a checklist and each checklist will be completed. There may be other critical incident operations to discuss which are not on the checklist. Discussion of these matters will be coordinated through the Incident Commander.

18.2.1 Debriefing Phase

Debriefings are usually conducted at the scene as the first step of the termination process. They begin immediately after the emergency phase is over and before the responders leave the scene. A checklist for the debriefing procedure is given below:

1. Conduct immediately after the emergency phase is over;
2. Have one chairperson or moderator. The IC is not necessarily the best choice;
3. Have all responders with a need-to-know present; and
4. Find all the necessary information available and the personnel with this knowledge.
5. If possible, find a dry, warm, quiet place to conduct the debriefing;

6. Express appreciation and discuss ONLY positive accomplishments;
7. Inform responders about the chemical and potential exposure hazards;
8. Inform responders about the symptoms of exposures and follow up medical actions;
9. Determine if the scene is safe and secured properly;
10. Assign personnel to post-incident investigation tasks for the critique;
11. Identify lost, damaged or contaminated equipment and supplies; and
12. Summarize the activities of various sectors and agencies.

18.2.2 Post Incident Analysis Phase

Usually this occurs after the debriefing, but before the critique. This process is used to gather information and seek solutions to problems that happened during the incident. The primary objective of post-incident analysis is to solve the problems before entering the critique by talking with people about those problems and determining appropriate corrective actions or solutions. By doing this, arguments may be prevented during the critique and constructive ideas to improve the response plan and procedures will result. A checklist for the post incident analysis includes:

1. Identify incident response problems and key personnel involved;
2. Assign information gathering and problem solving responsibilities;
3. Meet with everyone who has been given a responsibility before the critique begins;
4. Reconstruct the incident to gain a clearer picture if possible;
5. Determine financial responsibility if possible;
6. Notify key people and agencies to be invited to the critique;
7. Develop information and documentation to be used for the critique, if any; and
8. Organize a presentation for the critique.

18.2.3 Incident Critique and Follow-up Report

This is the final termination phase. It will be used as a learning tool to help correct response problems or reinforce effective response plans and procedures. The Incident Commander or the EOC shall appoint a moderator to facilitate the critique, but the Incident Commander should not be the moderator if possible. There should be no arguments allowed during the critiques and the objectives should be emphasized. (Disagreements are not necessarily arguments.) A checklist for the critique procedure is given below:

1. Invite only EOC personnel, representatives of outside agencies with a need-to-know, and any key people involved. Responders and representatives of outside agencies should not be invited just because they were called or present during the incident. Most responders can be briefed later by their respective representatives at the critique. Too many people at a critique invites arguments, delays the meeting and does not help accomplish the critique objectives.
2. Do not allow anyone to use the critique as a forum to assign blame and do not let the critique become a "free-for-all."
3. Be sure to address everyone's questions and ideas.

4. Inform everyone at the critique about response problems, accomplishments and recommended or suggested corrective actions. Solicit positive solutions. Reinforce the positive and emphasize the gratitude whenever possible.

Based on the results of the follow-up investigation, the IC will complete the following:

1. Incident Investigation report;
2. Response effort critique detailing those areas that were handled well and those areas needing additional attention. A list of recommendations should be included along with a rough time-table for corrective actions;
3. A review of the containment device and/or process from which the release occurred and measures that can be taken to ensure against reoccurrence; and
4. Summary reports will be provided to the EHS Coordinator.

Whenever this ICP fails during an emergency incident, it will be amended. Whenever the ICP is amended, the amendments will be provided to all plan recipients as soon as practicable.

Information learned from a post-incident review may be used in subsequent employee training.

18.2.4 Disposal Procedures

The recovery of spilled chemicals, and removal of contaminated debris is facilitated by an incident follow-up investigation team comprised of the FEC, response team representatives, and other employees involved with the incident. The FEC will determine what, if any, outside assistance is needed, and applicable federal, state, and local regulatory requirements and then select one or more of the following waste cleanup/management options:

1. Product Recovery - Whenever possible and feasible, spilled and contained chemicals will be returned to their original containers or process of origin. The Emergency Response Team and maintenance will ensure all leaks and punctures are repaired first.
2. Diversion to the Fredonia Wastewater Treatment Plant (WWTP) - Non-hazardous wastes may be diverted to the Fredonia WWTP. This option is only available if the diversion will not adversely impact the treatment plant's treatment capability and will not result in a violation of the treatment plant's discharge license or permit.
3. Off-Site Disposal - Non-hazardous and hazardous wastes that cannot be reused or diverted to Fredonia WWTP, will be collected, characterized and properly labeled, transported, and disposed at an appropriately licensed off-site facility.

Selected cleanup and disposal options will comply with all applicable federal, state, and local laws and rules. Decontamination wastes such as gloves, protective clothing and absorbent material will be classified as hazardous or non-hazardous waste and appropriately managed.

19. HAZARD COMMUNICATION PLAN

19.1 COMPLIANCE STATEMENT

This Written Hazard Communication Plan is designed to explain how SUNY Fredonia meets the requirements of OSHA's Hazard Communication Standard (29 CFR 1910.1200) and the New York State Toxic Substance's Information, Training and Education Act, also known as the New York State Right-to-Know law (12 NYCRR Part 820). Specifically, it describes how SUNY Fredonia obtains and uses material safety data sheets (MSDSs), labels products containing hazardous chemicals,[7] and trains employees and contract workers about the hazardous chemicals they may be exposed to at SUNY Fredonia.

The college is committed to employee safety and requires all employees to follow this plan and maintain their work areas accordingly. A copy of this Plan will be provided to SUNY Fredonia employees, their designated representatives, representatives of OSHA and the National Institute for Occupational Safety and Health ("NIOSH") upon request. In addition, other information required as part of SUNY Fredonia's hazard communication efforts (e.g., MSDSs and chemical lists) is available to employees upon request. Requesting to see such information is an employee's right and no employee will be penalized in any way for asking to review it. Using this information is part of SUNY Fredonia's shared commitment to a safe and healthy workplace.

19.2 STATEMENT OF PURPOSE

This Hazard Communication Plan is established to coordinate and administer the transmission of information concerning chemical hazards to all employees. All employees that may be exposed to chemicals are informed of the specific hazards of the chemicals that they may contact and the appropriate protective measures to use when handling the chemicals. This program defines how SUNY Fredonia will comply with the requirements of OSHA's Hazard Communication Standard (HCS), 29 C.F.R. § 1910.1200 and the New York State Right-to-Know law, 12 NYCRR Part 820.

This program applies to all employees of SUNY Fredonia College, whether part-time, full-time, hourly or salaried, and at all locations affiliated with the college. Students employed by SUNY Fredonia while in the course of their work are also included. Sub-contractors hired for any reason who are using hazardous materials are also required to comply with program requirements. In addition, sub-contractors must inform the Director of EHS if they are utilizing any hazardous chemicals which could endanger any nearby employees in the vicinity of work underway.

19.3 PROGRAM REVIEW

This written program shall be reviewed on an annual basis by all departmental hazardous materials coordinators, and the Director of EHS. Any revisions or updates shall be made and the policy shall be re-distributed to affected areas. The Director of EHS may be contacted in Hendrix Hall at ext. 3796 for information or in any case of emergency.

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[7] OSHA defines a "hazardous chemical" as any chemical that poses a physical or health hazard. 29 C.F.R. § 1910.1200(c).

19.4 HAZARDOUS CHEMICAL LISTS

All departments shall retain on file a complete inventory list of all hazardous materials utilized in that department. At a minimum, this shall include the name of each chemical, manufacturer, the area utilized, handled or stored, and verification as to whether the Material Safety Data Sheet (MSDS) is on file. Efforts should be made to obtain MSDSs for any hazardous chemicals used. Each department should designate one individual to document and maintain the inventory list and act as a point of a contact for this program. Copies of MSDSs shall be retained in the departments.

19.5 MATERIAL SAFETY DATA SHEETS (MSDS)

A current file of MSDSs is maintained in each department by the designated hazardous materials coordinator. A list of active chemicals is updated periodically as new chemicals are used in the process. Missing MSDSs are obtained from suppliers and/or manufacturers of chemicals. As a general rule, MSDSs should not be more than 3 years old. When a product's use is discontinued and no remaining product is on-site, the product's MSDS is removed from SUNY Fredonia's active MSDS binder to an inactive binder. In accordance with OSHA rules, SUNY Fredonia maintains records on discontinued products for at least 30 years which include: the name of the discontinued product; where it was used; and when it was used. 29 C.F.R. §§ 1910.1020(d)(ii)(B).

19.5.1 Content

The college uses a standard MSDS provided by the chemical supplier. MSDSs are in English and typically contain the following information:

1. The chemical identity used on the label, trade or chemical name, emergency phone numbers and the HMIS hazard rating.
2. The hazards of the chemical.
3. Precautionary measures and handling procedures.
4. Personal protective equipment and ventilation (routine handling).
5. Emergency procedures (first aid) and acute health effects.
6. Physical characteristics.
7. Fire, explosion, and reactivity hazards.
8. The health hazards, including signs and symptoms of exposure, and any medical conditions which are generally recognized as being aggravated by its exposure. The primary route(s) of entry, and target organs.
9. Spill and leak procedures.
10. Disposal procedures.
11. Ecological hazards.
12. Composition
13. Comments
14. Regulatory information, OSHA, DOT, EPA, etc.

19.5.2 Location

MSDSs are located at:

1. **Environmental Health and Safety Central File:** A complete inventory of all chemicals utilized at SUNY Fredonia and their Material Safety Data Sheets (MSDS) is located in the Director of EHS' office for 24-hour/7-days per week access.
2. **Departmental Coordinator's Central File**: Each department utilizing, storing or handling hazardous materials maintains a central file of all MSDSs and a complete updated inventory list. Files contain a copy of this policy and documentation of any employee training conducted.

19.5.3 MSDS Distribution

MSDSs for the hazardous chemicals in use must be made available to all employees in the area of their work sites. Supervisors and Managers ensure that MSDSs are readily available for review or in case of emergency. In any case of exposure to a hazardous chemical, a copy of the MSDS shall accompany the injured person to the medical facility for reference if seeking treatment. This policy is available to all employees for review.

19.5.4 Trade Secret Information

The chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name and other specific identification of a hazardous chemical, from the Material Safety Data Sheet if:

- It is a bonafide Trade Secret
- The hazards are disclosed
- The MSDS indicates that the specific chemical identity is being withheld as a Trade Secret
- The specific chemical identity is made available to health professionals where a treating physician or nurse determines that a medical emergency exists and the information is needed for first aid or emergency treatment.

Section (i) of 29 CFR 1910.1200, entitled *Trade Secrets*, will be followed to ensure compliance with this section. In non-emergency situations, a chemical manufacturer must, upon written request, disclose a specific chemical identity or other trade secret information to a Safety/Medical Department professional based on one of the following reasons:

- To assess the hazards of the chemicals to which employees will be exposed.
- To conduct or assess monitoring of the workplace atmosphere to determine employee exposure levels.
- To conduct pre-assignment or periodic medical surveillance of exposed employees.
- To provide medical treatment to exposed employees
- To select or assess appropriate personal protective equipment for exposed employees.
- To design or assess engineering controls or other protective measures for exposed employees
- To conduct studies to determine the health effect of exposure

- To obtain trade secret information, a Safety Department professional will contact the manufacturer by telephone to acquire the information without the use of written arrangements. If a written arrangement is necessary, a request will be sent to the manufacturer.
- All manufacturers' request for confidentiality will be complied with including a strict procedure for signing, maintaining (for example, in a locked safe), and disseminating confidential information.

19.6 LABELS, LABELING, AND WARNINGS

All chemicals on site will be stored in their original or approved containers with proper labels clearly visible. Labels must include the name of the chemical, and the physical and chemical health hazards of the substance which is in the container.

19.6.1 Unmarked Containers

No unmarked containers of any size which contain hazardous chemicals are to be left unattended in the work area. Any container found shall be reported to the hazardous materials coordinator in your department for proper labeling to be completed.

19.6.2 Container Labels

1. Labels and other forms of warning are to be legible, in English and/or pictograms and prominently displayed on the container.
2. New labels do not need to be added if existing labels already convey the required information.
3. Numeric labeling systems are used to warn of hazards of the material are applied on site or arrive with incoming materials.
4. The NFPA (National Fire Protection Association) labeling system is based on a hazard rating of 0-4 for health, flammability, and reactivity. Specific hazards such as "oxidizers" and other instructions such as "no water for fire fighting" are indicated in a diamond shape.
5. The HMIS (Hazardous Material Information System) is also a hazard system which uses a 0-4 rating for health, flammability, and reactivity, but is laid out in rectangles. The bottom bar is for indicating appropriate personal protective equipment.
6. These hazard warning systems are based with 0 being no known or minimal hazard to 4 being a severe or highly toxic hazard.

19.7 TRAINING

All SUNY Fredonia employees who work with or may be exposed to hazardous chemicals (defined at 29 C.F.R. § 1910.1200(c)) at the college are trained on the safe use and handling of the chemicals to which they may be exposed, the federal HCS and this plan. Records of any training conducted shall be maintained in the respective departments and a copy shall be forwarded to the Director of EHS. Department supervisors are responsible for reviewing specific MSDSs of chemicals which their employees use in the department.

19.7.1 Training Requirements

Chemical hazard communication training is required (29 C.F.R. § 1910.1200(h)(1)):

- Upon initial assignment to work area involving hazardous chemicals use or exposure.
- When new hazardous chemical(s) are introduced to a work area or new information about a chemical is revealed. The MSDS for the new or existing chemical shall be reviewed with the applicable employees.

19.7.2 Training Materials

Materials used for hazard communication training include:

- Commercially Produced Safety and Hazard Communication Videotapes;
- Material Safety Data Sheets for hazardous chemicals used at SUNY Fredonia; and
- Training session geared to familiarize employees with, and the location of, the hazardous chemicals in their work areas.

19.7.3 Scope of Training

Chemical Hazard Communication Training includes the following on which employees shall be fully trained:

- The provisions of the New York Right to Know Law and the OSHA Hazard Communication Standard.
- The SUNY Fredonia written policy and details of the Hazard Communication Plan.
- The location, availability, details of this written plan and the list of hazardous chemicals.
- The operations in the work area where hazardous chemicals are present.
- The location of Material Safety Data Sheets and how to access the computer for viewing and printing copies of the MSDS.
- The physical and health hazards of chemicals in the workplace; the methods of observations of detecting their presence or release, (such as appearance and odor of the chemical, or the use of meters that monitor and alarm in the presence of chemicals in the workplace).
- The specific hazards of the material and their effect on certain target organs such as the liver, kidneys, lungs and heart.
- The requirements for use and limitations of personal protective equipment and emergency procedures.
- The chemical labeling requirements and the use of MSDSs as a source of chemical hazard information.
- The methods used by the NFPA and HMIS warning systems to explain the health, flammability, and reactivity hazards of materials.
- Non-routine tasks will be reviewed as to their possible chemical exposures. Employees shall be informed of the hazards, and personal protective equipment needed by reviewing the appropriate MSDS and evaluating the potential of reactants while these tasks are under way.

- Contractors on site will be trained in these policies, shown how to follow the labeling requirements of this program, and shown how to obtain access to the MSDS.

See 29 C.F.R. § 1910.1200(h).

19.8 OUTSIDE CONTRACTORS

Prior to any outside contractor starting work within the college facilities, the SUNY Fredonia employee responsible for hiring the contractor will meet with him and discuss the work to be done. The contractor will be advised of the following:

- Hazardous chemicals to which there may be possible exposure while on the job site;
- Measures the contractor's employees may take to lessen the possibility of exposure; and
- The availability of MSDSs for all hazardous chemicals on file and where a copy may be obtained.

The contractor will also be provided with a copy of SUNY Fredonia's Hazard Communication Program. The contractor will be responsible for providing adequate safeguards so his employees can complete the work without endangering themselves or others. The contractor is expected to have his own written program and be in full compliance with the applicable state and federal requirements. The contractor is expected to use signs, barricades and other appropriate means to keep unauthorized personnel out of the work area. The contractor shall provide MSDSs for any chemicals brought on site that could create a physical or health hazard to SUNY Fredonia employees and affected employees shall be made aware of this information.

19.9 NON-ROUTINE TASKS

Any non-routine work will be reviewed for potential exposure to hazardous chemicals by the supervisor. Prior to starting non-standard work, each employee will be given information about hazardous chemicals involved with such activities. This information will include:

- Specific chemical hazards; and
- Protective/safety measures the employee can take.

A procedure will be agreed upon detailing appropriate actions and safeguards to control exposure to any hazardous chemical. This procedure will be used whenever the work is being done.

19.10 HAZARDOUS CHEMICAL DETERMINATION

The college relies on manufacturers' MSDSs to determine whether the products it uses are or contain hazardous chemicals.

19.11 ADDITIONAL INFORMATION

For additional information regarding SUNY Fredonia's HCS plan, chemical hazards, or MSDSs, employees should contact the Director of EHS.

APPENDIX A: ACRONYMS

ACRONYMS

API – American Petroleum Institute

AST - Above Ground Storage Tank

C.F.R. - Code of Federal Regulations

DEC - New York State Department of Environmental Conservation

DOT - Department of Transportation

EHS - Extremely Hazardous Substance

EHS - Environmental Health and Safety

EOC - Emergency Operations Center

EPA - Environmental Protection Agency

EMT - Emergency Medical Technician

FEC - Facility Emergency Coordinator

Hazardous Material - Includes hazardous chemicals, hazardous and extremely hazardous substances, hazardous wastes, and all petroleum products

HazMat Team - Hazardous Material Emergency Response Team

HCS - Federal Hazard Communication Standard

HR - Human Resources

IC - Incident Command

ICP - Integrated Contingency Plan

ICS - Incident Command System

IDLH - Immediately Dangerous to Life and Health

LEPC - Local Emergency Planning Committee

MOC - Media Operations Officer

MSDS - Material Safety Data Sheet

NFPA - Natural Fire Protection Association

NIOSH - National Institute for Occupational Safety and Health

OSHA - Occupational Safety and Health Administration

PIO - Public Information Officer

PPE - Personal Protective Equipment

SCBA - Self Contained Breathing Apparatus

SERC - State Emergency Response Commission

SPCC - Spill Prevention Control and Countermeasure

STI – Steel Tank Institute

TPQ - Threshold Planning Quantity

UST – Underground Storage Tank

WWTP – Wastewater Treatment Plant

APPENDIX B: APPLICABILITY OF SUBSTANTIAL HARM CRITERIA CHECKLIST

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST

Facility Name: State University of New York College at Fredonia

Facility Address: Central Avenue, Fredonia, New York

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 one million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments.

   Yes:_____ No: X

4. Does the facility have a total oil storage capacity of greater than or equal to 1 million gallons and is the facility located at a distance 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 one 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 five years?

   Yes:_____ No: X

APPENDIX C: ANNUAL AST INSPECTION CHECKLIST

STI SP001 ANNUAL ABOVEGROUND TANK/CONTAINER INSPECTION CHECKLIST

General Inspection Information:

Inspection Date:		Retain Until Date:	(36 months from inspection date for SPCC compliance)
Prior Inspection Date:		Inspector Name:	
Tanks Inspected (ID #s):		Inspector Signature:	

Item		Status	Comments
1.0	**Tank Containment**		
1.1	Containment structure in satisfactory condition?	☐Yes ☐No*	
1.2	Drainage pipes/valves fit for continued service?	☐Yes ☐No* ☐N/A	
2.0	**Tank Foundation and Supports**		
2.1	Evidence of tank settlement or foundation washout?	☐Yes* ☐No	
2.2	Cracking or spalling of concrete pad or ring wall?	☐Yes* ☐No	
2.3	Tank supports in satisfactory condition?	☐Yes ☐No*	
2.4	Water able to drain away from tank?	☐Yes ☐No*	
2.5	Grounding strap secured and in good condition?	☐Yes ☐No*	
3.0	**Cathodic Protection**		
3.1	CP system functional	☐Yes ☐No* ☐N/A	
3.2	Rectifier Reading:		
4.0	**Tank External Coating**		
4.1	Evidence of paint failure?	☐Yes* ☐No	

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Item		Status	Comments
5.0	**Tank Shell/Heads**		
5.1	Noticeable shell/head distortions, buckling, denting or bulging?	☐Yes* ☐No	
5.2	Evidence of shell/head corrosion or cracking?	☐Yes* ☐No	
6.0	**Tank Manways, Piping and Equipment within Secondary Containment**		
6.1	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	☐Yes ☐No*	
7.0	**Tank Roof**		
7.1	Standing water on roof?	☐Yes* ☐No	
7.2	Evidence of coating cracking, crazing, peeling, blistering?	☐Yes* ☐No	
7.3	Holes in roof?	☐Yes* ☐No	
8.0	**Venting**		
8.1	Vents free of obstructions?	☐Yes ☐No*	
8.2	Emergency vent operable? Lift as required?	☐Yes ☐No*	
9.0	**Insulated Tanks**		
9.1	Insulation missing?	☐Yes* ☐No	
9.2	Are there noticeable areas of moisture on the insulation?	☐Yes* ☐No	
9.3	Mold on insulation?	☐Yes* ☐No	
9.4	Insulation exhibiting damage?	☐Yes* ☐No	
9.5	Is the insulation sufficiently protected from water intrusion?	☐Yes ☐No*	

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

Item		Status	Comments
10.0	**Level and Overfill Prevention Instrumentation of Shop-Fabricated Tanks**		
10.1	Has the tank liquid level sensing device been tested to ensure proper operation?	☐Yes ☐No*	
10.2	Does the tank liquid level sensing device operate as required?	☐Yes ☐No*	
10.3	Are overfill prevention devices in proper working condition?	☐Yes ☐No* ☐N/A	
11.0	**Electrical Equipment**		
11.1	Are tank grounding lines in good condition?	☐Yes ☐No* ☐N/A	
11.2	Is electrical wiring for control boxes/lights in good condition?	☐Yes ☐No* ☐N/A	

Additional Comments

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

STI SP001 Annual Inspection Checklist

Inspection Guidance:

- For equipment not included in this standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a certified inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems.
- Inspect the AST shell and associated piping, valves, and pumps including inspection of the coating for Paint Failure.
- Inspect:
    1. Earthen containment structures including examination for holes, washout, and cracking in addition to liner degradation and tank settling.
    2. Concrete containment structures and tank foundations/supports including examination for holes, washout, settling, paint failure, in addition to examination for corrosion and leakage.
    3. Steel containment structures and tank foundations/supports including examination for washout, settling, cracking, and for paint failure, in addition to examination for corrosion and leakage.
- Inspection of cathodic protection system, if applicable, includes the wire connections for galvanic systems and visual inspection of the operational components (power switch, meters, and alarms) of impressed current systems.
- Remove promptly upon discovery standing water or liquid in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and dispose of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility must regularly test liquid level sensing devices to ensure proper operation (40 C.F.R. § 112.8(8)(v)).
- (*) designates an item in a non-conformance status. This indicates that action is required to address a problem.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a certified inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for 36 months.
- Complete this checklist on an annual basis supplemental to the owner monthly-performed inspection checklists.
- **Note: If a change has occurred to the tank system or containment that may affect the SPCC Plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.**

(*) designates an item in non-conformance status. This indicates that action is required to address a problem.

APPENDIX D: FIRE PROTECTION EQUIPMENT

To be inserted by SUNY Fredonia

APPENDIX E: DOT FORM F 5800.1

U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

Hazardous Materials Incident Report

Form Approval OMB No. 2137-0039

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 2137-0039. The filling out of this information is mandatory and will take 96 minutes to complete.

INSTRUCTIONS: Submit this report to the Information Systems Manager, U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration, Office of Hazardous Materials Safety, DHM-63, Washington, D.C. 20590-0001. If space provided for any item is inadequate, use a seperate sheet of paper, identifying the entry number being completed. Copies of this form and instructions can be obtained from the Office of Hazardous Materials Website at http://hazmat.dot.gov. If you have any questions, you can contact the Hazardous Materials Information Center at 1-800-HMR-4922 (1-800-467-4922) or online at http://hazmat.dot.gov.

PART I - REPORT TYPE

1. This is to report:
- ☐ **A)** A hazardous material incident
- ☐ **B)** An undeclared shipment with no release
- ☐ **C)** A specification cargo tank 1,000 gallons or greater containing any hazardous materials that (1) received structural damage to the lading retention system or damage that requires repair to a system intended to protect the lading retention system and (2) did not have a release.

2. Indicate whether this is:
- ☐ An initial report
- ☐ A supplemental (follow-up) report
- ☐ Additional Pages

PART II - GENERAL INCIDENT INFORMATION

3. Date of Incident: _____ **4.** Time of Incident (use 24-hour time): _____

5. Enter National Response Center Report Number (if applicable): _____

6. If you submitted a report to another Federal DOT agency, enter the agency and report number: _____

7. Location of Incident: City: _____ County: _____ State: _____ ZIP Code (if known): _____

Street Address/Mile Marker/Yardname/Airport/Body of Water/River Mile _____

8. Mode of Transportation ☐ Air ☐ Highway ☐ Rail ☐ Water

9. Transportation Phase ☐ In Transit ☐ Loading ☐ Unloading ☐ In Transit Storage

10. Carrier/Reporter
Name _____
Street _____
City _____ State _____ ZIP Code _____
Federal DOT ID Number _____ Hazmat Registration Number _____

11. Shipper/Offeror
Name _____
Street _____
City _____ State _____ ZIP Code _____
Waybill/Shipping Paper _____ Hazmat Registration Number _____

12. Origin (if different from shipper address)
Street _____
City _____ State _____ ZIP Code _____

13. Destination
Street _____
City _____ State _____ ZIP Code _____

14. Proper Shipping Name of Hazardous Material: _____

15. Technical/Trade Name: _____

16. Hazardous Class/Division: _____

17. Identification Number: _____ (E.g. UN2764, NA 2020)

18. Packing Group: _____ (if applicable)

19. Quantity Released: _____ (Include Measurement Units)

20. Was the material shipped as a hazardous waste? ☐ Yes ☐ No If yes, provide the EPA Manifest Number: _____

21. Is this a Toxic by Inhalation (TIH) material? ☐ Yes ☐ No If yes, provide the Hazard Zone: _____

22. Was the material shipped under an Exemption, Approval, or Competent Authority Certificate? ☐ Yes ☐ No

If yes, provide the Exemption, Approval, or CA number: _____

23. Was this an undeclared hazardous materials shipment? ☐ Yes ☐ No

PART IV - CONSEQUENCES

30. Result of Incident (check all that apply): ☐ Spillage ☐ Fire ☐ Explosion ☐ Material Entered Waterway/Storm Sewer ☐ Vapor (Gas) Dispersion ☐ Environmental Damage ☐ No Release

31. Emergency Response : The following entities responded to the incident: (Check all that apply)

☐ Fire/EMS Report #_____ ☐ Police Report #_____ ☐ In-house cleanup ☐ Other Cleanup

32. Damages: Was the total damage cost more than $500? ☐ Yes ☐ No

If yes, enter the following information: If no, go to question 33.

Material Loss: $_____ Carrier Damage: $_____ Property Damage: $_____ Response Cost: $_____ Remediation/Cleanup Cost: $_____

(See damage definitions in the instructions)

33a. Did the hazardous material cause or contribute to a human fatality? ☐ Yes ☐ No

If yes, enter the number of fatalities resulting from the hazardous material:

Fatalities: Employees _____ Responders _____ General Public _____

33b. Were there human fatalities that did not result from the hazardous material? ☐ Yes ☐ No If yes, how many? _____

34. Did the hazardous material cause or contribute to personal injury? ☐ Yes ☐ No

If yes, enter the number of injuries resulting from the hazardous material:

Hospitalized (Admitted Only): Employees _____ Responders _____ General Public _____

Non-Hospitalized: Employees _____ Responders _____ General Public _____

(e.g.: On site first aid or Emergency Room observation and release)

35. Did the hazardous material cause or contribute to an evacuation? ☐ Yes ☐ No

If yes, provide the following information:

Total number of general public evacuated _____ Total number of employees evacuated _____ Total Evacuated _____

Duration of the evacuation _____ (hours)

36. Was a major transportation artery or facility closed? ☐ Yes ☐ No If yes, how many? _____ (hours)

37. Was the material involved in a crash or derailment? ☐ Yes ☐ No

If yes, provide the following information: Estimated speed (mph): _____ Weather conditions: _____

Vehicle overturn? ☐ Yes ☐ No

Vehicle left roadway/track? ☐ Yes ☐ No

PART V - AIR INCIDENT INFORMATION (please refer to § 175.31 to report a discrepancy for air shipments)

38. Was the shipment on a passenger aircraft? ☐ Yes ☐ No

If yes, was it tendered as cargo, or as passenger baggage?

☐ Cargo ☐ Passenger baggage

39. Where did the incident occur (if unknown, check the appropriate box for the location where the incident was discovered)?

☐ Air carrier cargo facility ☐ Sort center ☐ Baggage area

☐ By surface to/from airport ☐ During flight ☐ During loading/unloading of aircraft

40. What phase(s) had the shipment already undergone prior to the incident? (Check all that apply)

☐ Shipment had not been transported ☐ Transported by air (first flight) ☐ Transport by air (subsequent flights)

☐ Initial transport by highway to cargo facility ☐ Transfer at sort center/cargo facility