

OIL SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

**THE ORDER OF ST. BENEDICT / ST. JOHN'S
UNIVERSITY
2900 ABBEY PLAZA
COLLEGEVILLE, MN 56321**

Prepared for:



**GANARD ORIONZI
DIRECTOR, ENVIRONMENTAL HEALTH
AND SAFETY
ST. JOHN'S UNIVERSITY**

July 2015

Prepared by:

LIESCH, A TERRACON COMPANY



Environmental • Facilities • Geotechnical • Materials

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LOCATION

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COLLEGEVILLE, MN 56321**

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TABLE OF CONTENTS

	PAGE
1.0 PROFESSIONAL ENGINEER CERTIFICATION 40 CFR 112.3	1
2.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL 40 CFR 112.7	1
3.0 CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST (C-11 FORM).....	1
4.0 FIVE YEAR REVIEW PLAN SUMMARY PAGE	1
5.0 SPILL EXPERIENCE/HISTORY	2
6.0 INTRODUCTION	2
7.0 FACILITY INFORMATION	3
8.0 EMERGENCY TELEPHONE NUMBERS/PROCEDURES.....	8
8.1 SAFETY	9
8.2 DISPOSAL OF RECOVERED MATERIALS.....	9
8.3 REPORTING.....	9
8.4 SPILL INCIDENT MITIGATED ON-SITE	10
8.5 RECORDKEEPING REQUIREMENTS.....	10
9.0 40CFR 112.7 GENERAL REQUIREMENTS	10
9.1 POTENTIAL EQUIPMENT FAILURES RESULTING IN SPILLS 112.7 (B).....	11
THE FOLLOWING TABLE DISCUSSES POTENTIAL EQUIPMENT FAILURES AT THE FACILITY. SPECIFIC TANKS DISCUSSED CAN BE LOCATED IN SECTION 7.0 AND ON FIGURES 2-33, APPENDIX B.	11
10.0 CONTAINMENT AND DIVISIONARY STRUCTURES - 40 CFR 112.7(c)	12
11.0 DEMONSTRATION OF FACILITY PRACTICABILITY - 40 CFR 112.7(d).....	12
12.0 INSPECTIONS AND RECORDS - 40 CFR 112.7(e)	13
13.0 PERSONNEL, TRAINING, SPILL PREVENTION PROCEDURES - 40 CFR 112.7(f)	13
14.0 SECURITY - 40 CFR 112.7(g).....	14
15.0 TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK - 40 CFR 112.7(h).14	
16.0 FIELD CONSTRUCTED TANKS – 40 CFR 112.7 (I).....	14
17.0 STATE OF MINNESOTA REQUIREMENTS – 40 CFR 112.7 (J)	14
18.0 GENERAL REQUIREMENTS – 40 CFR 112.8 (A)	16
19.0 FACILITY DRAINAGE - 40 CFR 112.8 (b).....	16
20.0 BULK STORAGE TANKS - 40 CFR 112.8 (c)	16

21.0	TRANSFER OPERATION, PUMPING, AND IN-PLANT PROCESSES - 40 CFR 112.8(D)	17
22.0	RULE SECTIONS NOT APPLICABLE	17

APPENDICES

Appendix A	Certification of Substantial Harm Determination Form
Appendix B	Figure 1 – Property Location Map
	Figure 2 – Power Plant Area
	Figure 3 – Service Garage Area
	Figure 4 – Location of Hydraulic Elevators and Oil-Filled Transformers
Appendix C	Spill Incident Report Form
Appendix D	Training Documents
Appendix E	Tank Inspection Form

1.0 PROFESSIONAL ENGINEER CERTIFICATION 40 CFR 112.3

Certification: By means of this certification, I attest that I am familiar with the requirements of provisions of 40 CFR Part 112, that I or my designated agent have visited and examined the facility, that this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this Part, that procedures for required inspections and testing have been established and that the plan is adequate for the facility.

Engineer: John Lichter Registration Number: 11837 State: Minnesota

Signature: _____

John Lichter

Date of Plan Certification: _____

7/14/2015



2.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL 40 CFR 112.7

I hereby certify that the necessary resources to implement this Plan have been committed.

Brother Benedict Leuthner, OSB
Corporate Treasurer

Date

3.0 CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST (C-11 FORM)

Please see **Appendix A** for a copy of the completed form.

4.0 FIVE YEAR REVIEW PLAN SUMMARY PAGE

In accordance with 40 CFR 112.5 (b), a review and evaluation of this SPCC Plan is conducted at least once every three years prior to August 16, 2002 and at least once every five years after August 17, 2002 by a registered Professional Engineer. Periodic reviews should be completed by facility staff on an as needed basis. These reviews and evaluations are recorded below:

<u>Reviewer (print)</u>	<u>Date</u>	<u>Comments</u>	<u>Is PE re-certification required?</u>
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1. G. Orionzi	8/14/03	First Version	Yes
2. G. Orionzi	4/14/05	Revised	Yes
3. G. Orionzi	5/13/10	Revised	Yes
4. G. Orionzi	7/15/15	Revised	Yes

A complete copy of the SPCC Plan is maintained in the office of St. John's University Director of Environmental Health and Safety per Part 112.3 (e).

5.0 SPILL EXPERIENCE/HISTORY

In the last five years the facility has not experienced spills above the reportable quantity of oil on-site. Any releases should they occur would be reported on forms such as those shown in **Appendix C**.

6.0 INTRODUCTION

Spill Prevention, Control and Countermeasure (SPCC) plans for facilities are prepared and implemented as required by the US Environmental Protection Agency (US EPA) Regulation contained in Title 40, Code of Federal Regulations, Part 112, (40 CFR 112). A non-transportation related facility is subject to SPCC regulations if: the aggregate aboveground capacity of the facility exceeds 1,320 gallons (excluding those tanks and oil filled equipment below 55 gallons in capacity) or if the aggregate underground capacity of the facility exceeds 42,000 gallons (excluding those that are currently subject to all of the technical requirements of 40 CFR Part 280 or all of the technical requirements of state programs approved under 40 CFR Part 281.); and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States.

An SPCC plan is not required to be filed with the US EPA, but a copy must be available for on-site review by the Regional Administrator (RA) during normal working hours. The SPCC plan must be submitted to the US EPA Region 5 RA and the state agency along with the other information specified in Section 112.4 (a) if either of the following occurs:

1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event; or
2. The facility discharges oil in quantities greater than 42 gallons in each of two spill events within any twelve month period.

The following spill information must be submitted to the RA within 60 days if either of the above thresholds is reached. This report is to contain the following information (112.4 (a) :

1. Name of the facility
2. Name of the individual submitting the information.
3. Location of the facility.
4. Maximum storage or handling capacity of the facility and normal daily throughput.
5. The corrective actions and/or countermeasures taken, including adequate description of equipment repairs and/or replacements.
6. Description of the facility including maps, flow diagrams and topographical map.
7. The cause(s) of such spill(s), including a failure analysis of system or subsystem in which failure occurred.
8. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
9. Such other information as the Regional Administrator may reasonably require that is pertinent to the plan or spill event(s).

The SPCC plan must be amended within 6 months whenever there is a change in facility design, construction, operation or maintenance that materially affects the facility's spill potential. The SPCC plan must be reviewed at least once every 5 years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. All such amendments must be re-certified by a registered professional engineer (PE).

Owners and operators failing or refusing to comply with this federal regulation are liable to a civil administrative penalty of up to \$11,000 per day (up to a maximum of \$127,500) or judicial civil penalties of up to \$27,500 per day.

If owners and operators of a facility that are required to prepare an SPCC plan and are not required to submit a Facility Response Plan, the SPCC plan should include a signed certification form, see **Appendix A** (per Appendix C to 40 CFR 112).

7.0 FACILITY INFORMATION

Facility Name: The Order of St. Benedict/St. John's University

Mailing Address: The Order of St. Benedict/St. John's University
2900 Abbey Plaza, P.O. Box 2400
Collegeville, MN 56321

Street Address: The Order of St. Benedict
St. John's University
2900 Abbey Plaza
Collegeville, MN 56321
Telephone: (320) 363-3267

Owner: The Order of St. Benedict
St. John's University
Collegeville, MN 56321
Telephone: (320) 363-3267

Contact Name: Ganard Orionzi, Director of Environmental Health and Safety
(320) 363-3267

Other Personnel: See listing in Section 8.0.

Location: The facility is located in Stearns County, Minnesota, in a campus setting. The St. John's University campus and Abbey are located approximately twelve miles west of the central business district of St. Cloud, Minnesota (see **Figure 1, Appendix B**). The entire property encompasses approximately 2,500 acres. A significant portion of the Property remains undeveloped.

Facility Description: The Abbey site was initially occupied in the 1850's. The college began operation in 1857 and expanded to its current size. The campus and Abbey now consist of 89 buildings. The monastic community historically conducted agricultural; milling and other limited industrial operations to support the Abbey and the college. The current campus consists of the Abbey, St. John's University, Liturgical Press and St. John's Preparatory School. Various support operations are conducted to support these operations. They include custodial, food service, physical plant, printing, electrical shop, plumbing shop, woodshop, metal shop and vehicle maintenance operations.

The following tables summarize the use of oil products equipment on the facility:

Fixed Storage:

Tank No.	Substance Stored	Volume (gallons)	Installation Date	Tank Location
1	Fuel Oil	30,000	1999	UST East of Power Plant
2	Fuel Oil	30,000	1999	UST East of Power Plant
3	Fuel Oil	1,500	1993	AST in Power Plant
4	Fuel Oil	150	1993	AST in Power Plant
5	Diesel Fuel	4,000	1993	UST at Service Garage
6	Gasoline	12,000	1993	UST at Service Garage

Tank No.	Substance Stored	Volume (gallons)	Installation Date	Tank Location
7	Used Oil	250	1998	Service Garage
GS-1	Diesel Fuel	400	2005	South of Wimmer Hall
GS-2	Diesel Fuel	200	2005	North of Benet Hall
GS-3	Diesel Fuel	200	2006	East of Alcuin Library

NOTE: See **Figures 2-4, Appendix B** for locations of tanks.

The two fuel oil storage USTs are double-walled fiberglass tanks and have interstitial monitoring devices that are continuously checked and displayed in the power plant.

The motor fuel USTs are STI-P3 tanks with cathodic protection systems. All underground piping associated with these tanks is double-walled. Spill boxes are in use on these tanks. Both the piping systems and tanks have continuous leak detection systems; however, these USTs are single-walled.

Portable Tank Storage: None

Container Storage:

Location No.	Substance Stored	Container Volume/Quantity	Location
1	Fuel Oil	55 gallons	Power House - Level 1
2	Antifreeze	55 gallons	Power House - Level 1
3	Diesel Engine Oil	55 gallons	Power House - Level 1
4	Motor Oil	2 - 55 gallons	Power House - Level 0
5	Turbine Oil	55 gallons	Power House - Level 0
6	5 W30	55 gallons	Garage - east side
7	10 W30	55 gallons	Garage - east side
8	Used Antifreeze	55 gallons	Garage - east side
9	Used Oil	2 – 55 gallons	Garage – east side
10	15W40	55 gallons	Garage - west side
11	SAE 30	55 gallons	Garage - west side
12	10W30	55 gallons	Garage - west side

NOTE: See **Figures 2-3, Appendix B** for container locations.

Transformer Storage:

Location	In/Outside	Oil in gallons**	PCB	Contained	Year Installed***
01 – Luke Vault West	In	220	N	Y	
02 – Luke Vault Center	In	220	N	Y	2000
03 – Luke Vault East	In	220	N	Y	1979
06 – Prep School	In	138	N	N (floor DR)	1997
07 – Prep Dorm	In	84*	N	N (floor DR)	1962
09 – Garage	Out	215	N	N	1977
10 – WWTP	Out	215	N	N	1964
11 – WWTP	Out	120	N	N	1964
15 – Seton	Out	220*	N	N	1981
16 – Well House #4	Out	215	N	N	1999

Location	In/Outside	Oil in gallons**	PCB	Contained	Year Installed***
17 – Palaestra	Out	243*	N	N	1972
18 – Radio Tower	Out	90	N	N	1966
25 – Thomas Hall	In	105	N	N (floor DR)	
26 – SBH Auditorium	Out	220	N	N	1985
27 – Art Building	In	90*	N	N (floor DR)	1990
29 – Firestation	Out	150	N	N	1989
30A – Power House	Out	220	N	N	1994
31 – Lumber Shed	Out	150	N	N	
34 – Emmaus	Out	150	N	N RTEMP	1989
38 – Sexton Commons	In	138	N	Y	1993
30 – Cooling Tower	Out	215	N	N	1998
41 – Cooling Tower	Out	220	N	N	1989
41A – Cooling Tower	Out	90	N	N	1989
42 – Simons	In	90	N	Y	1989
43 – Power House	Out	260	N	N	1999
44 – Power House	Out	260*	N	N	1989
45 – Power House	Out	207	N	N	
46 – Maur/Placid	Out	220	N	N	2001 RLBT
48 – Quad SE	Out	220	N	N	1989
49 – Health Center	Out	220	N	N	1977
50 – Metton	Out	146*	N	N	1992
51 – Vincent	Out	220	N	N	1996
52 – McNeely	Out	220	N	N	1998
53 – New Science	Out	220	N	N	1998
59 – Intramural Field	Out	215	N	N	1990
60 – Flynntown Apartments	Out	220	N	N	2009
61 – McKeown Center	Out	220	N	N	2009
62 – Collegeville Institute	Out	172	N	N	2009
63 – Boniface Hall	Out	220	N	N	2008
64 – Mary Hall SW	Out	195	N	N	2008
65 – Press Box North	Out	215	N	N	2009
66 – Press Box North	Out	215	N	N	2009
67 – Guesthouse	Out/Pit	220	N	N	2006
68 – Charter House	Out	145	N	N	2006
69 – Bede Hall Addition	Out	220	N	N	2007
70 – Virgil Michael	Out	220	N	N	2015
71 – Monastery	Out	220	N	N	2015
72 – Bede Hall Addition	Out	145	N	N	2015

* Actual nameplate amount

** Unless noted, this is an estimate from T&R Transformer.

*** Dates are based on invoices or electrical inspector approval.

NOTE: See **Figure 4, Appendix B** for all transformer locations.

Hydraulic Elevator Storage:

	Location	Substance Stored	Volume (Gallons)
1	Alcuin Library	Hydraulic Oil	120
2	Angel Tower	Hydraulic Oil	220
3	Art Center	Hydraulic Oil	80
4	Auditorium	Hydraulic Oil	90
5	Benet Hall	Hydraulic Oil	300
6	Bernard Hall	Hydraulic Oil	260
7	Campus Center	Hydraulic Oil	100
8	Devils Tower	Hydraulic Oil	220
9	Engel Hall	Hydraulic Oil	80
10	Food Service	Hydraulic Oil	60
11	Health Center	Hydraulic Oil	200
12	New Science Building	Hydraulic Oil	180
13	Patrick Hall	Hydraulic Oil	260
14	Quad	Hydraulic Oil	140
15	Science Hall	Hydraulic Oil	200
16	Sexton Commons	Hydraulic Oil	180
17	Thomas Hall	Hydraulic Oil	160
18	Virgil Michel	Hydraulic Oil	120
19	Palaestra	Hydraulic Oil	80
20	Guesthouse	Hydraulic Oil	120
21	Pavilion	Hydraulic Oil	80
22	Bede Hall Addition	Hydraulic Oil	160
23	Press Box Addition	Hydraulic Oil	80
24	McKeown Center	Hydraulic Oil	120
25	Flynntown Apartments	Hydraulic Oil	140

Total Oil Storage: 92,708 gallons

In-Plant Treatment: None

Vehicles: Several automobiles, pickups and maintenance vehicles are owned and used on the campus.

Dispensing Equipment: Two dispensers rated at 12-15 gpm are in use at the garage fuel dispensing island. The dispensers are used on a limited basis to fuel on-site equipment and vehicles with diesel fuel or gasoline.

CONTAINMENT VOLUME CALCULATION

Secondary containment data is summarized in the following table:

Tank No.	Containment Dimensions	Capacity Cu. Ft.	Capacity Gallons	Containment Walls	Containment Floor
1	NA – Underground	NA	NA	NA	NA
2	NA – Underground	NA	NA	NA	NA
3	Indoors	192	1,436	Concrete	Concrete
4	Indoors	NA	NA	Concrete	Concrete
5	NA – Underground	NA	NA	NA	NA
6	NA – Underground	NA	NA	NA	NA
7	Indoors	NA	NA	Concrete	Concrete

8.0 EMERGENCY TELEPHONE NUMBERS/PROCEDURES

In the event of a spill, the trained St. John's University responder shall take immediate actions to prevent further spillage and to confine the spill to the smallest practical area. The following shall be accomplished if possible:

- Close the appropriate valve(s) on tanks, tanker truck, containment dikes, or pipelines;
- Stop the operation of transfer pumps
- Plug or cover leaks in tanks, pipes, or transfer hoses.
- Immediately notify the shift supervisor or emergency contact coordinator and provide the following information; spill location nature and volume of spill and describe measures taken. If the spill exceeds 5 gallons, notify the Minnesota Duty Officer.
- Warn other employees and on-site personnel of the spill by voice, two-way radios, telephones, or other available methods;
- Contain the spill using absorbent materials (e.g., dirt, sand, or other relatively impervious material) to dam up the spill and prevent further flow of the material from the spill area into drainage ditches or surface waters;
- Assess the need for and if necessary call in outside response contractors.

Emergency Numbers:	St. John's Life Safety Services	911 (320-363-2144)
	St. John' Fire Department	911
	Minnesota Deputy Officer	1-800-422-0798
	National Response Center	1-800-424-8802
	Baywest (Cleanup Contractor)	1-800-279-0456

Emergency Contacts:	Tom Vogel (Powerhouse)	320-363-2541 (work) 320-828-3899 (cell)
	Lawrence Koltes (Powerhouse)	320-363-2541 (work) 320-291-3993 (cell)

Gary Jorgensen (Physical Plant)	320-363-3996 (work) 320-291-8915 (cell) 320-685-4026 (home)
James Habiger (Physical Plant)	320-363-3303 (work) 320-292-2155 (cell)
Br. Damian Rogers (Garage)	320-363-2554 (work)
Ganard Orionzi (EHS)	320-363-3267 (work) 320-293-9753 (cell)

8.1 SAFETY

Oils and petroleum products are hazardous materials, and personnel must take measures to prevent accidental ignition of any waste materials during spill remedial activities. The following safety requirements shall be strictly enforced by the responder under the direction of the facility manager.

- Personnel shall wear appropriate PPE devices;
- Smoking shall be prohibited within 100 feet of the spill-impacted area.
- Ignition sources shall be prohibited in the spill area;
- Spark-producing equipment and tools shall be prohibited from use near spilled materials unless specifically authorized.
- No operations shall be conducted during electrical storms.

8.2 DISPOSAL OF RECOVERED MATERIALS

The recovered spilled and containment materials shall be properly disposed of in accordance with local, state and federal regulations.

- Dispersing materials (such as chemicals) or methods (such as spraying into drainage ways) shall not be used unless specifically authorized by the regulatory personnel;
- Free product shall be collected by applying absorbent materials until all free liquids are retained;
- Soils, absorbents, temporary diking materials, and other debris contaminated during the spill or used to contain a flammable product shall be collected with non-spark-producing tools and placed in containers, which shall be sealed upon filling. Containers shall be labeled "FLAMMABLE";
- All containerized waste products shall be classified and tested, if necessary.

8.3 REPORTING

If oil is discharged into or upon the navigable waters of the United States, or adjoining shorelines, or into or upon the waters of the contiguous zone in quantities which violate applicable water quality

standards, cause a film or sheen on the U.S. waters or adjoining shorelines, or cause a sludge or emulsion to be deposited beneath the surface of the water or upon the adjoining shorelines, then the Facility shall:

1. Notify the National Response Center by telephone by 1-800-424-8802 (24 hours a day/7 days a week) of the discharge.
2. Notify the State Duty Officer, 1-800-422-0798.
3. Notify the USEPA Region V Spill Phone, (312) 353-2318.
4. The verbal notification report will include the following information regarding the spill:
 - a. The location, time and date.
 - b. The material and quantity.
 - c. Name of stream involved.
 - d. The company name, address, and phone numbers and/or responsible party.
 - e. The spill reporter's name, address, and phone number.
 - f. Action taken and disposal site.
 - g. Secondary problems (i.e., water supply affected, fish kill, excavation, etc.).

8.4 SPILL INCIDENT MITIGATED ON-SITE

The following notification and reporting procedures are followed in the event of an incident which is mitigated on-site without implementation of the SPCC Plan:

- The employee who identifies the spill shall notify the Shift Supervisor of the spill incident;
- A determination will be made by the Shift Supervisor as to whether the incident is reportable; and
- If the spill is either reportable or non-reportable to State and Federal Agencies, a report documenting the incident will be maintained at the Facility by the Plant Environmental Manager.

8.5 RECORDKEEPING REQUIREMENTS

All documentation regarding spills shall be retained at the Facility for a period of at least three (3) years, including documentation of state and federal notifications, copies of written reports to regulatory agencies, and documentation of spills mitigated on-site, as well as records, manifests, and disposal information resulting from the cleanup of spills.

9.0 40CFR 112.7 GENERAL REQUIREMENTS

- (1) This Facility is in complete conformance to the SPCC Regulation.

- (2) In complying with all applicable requirements of the SPCC Regulation, no deviations were employed or claimed in this Plan.
- (3) See **Figures 2-3, Appendix B** for the location of the storage tanks and general arrangements of the Facility. Also provided on this diagram are storm water drain inlets and flow (scope) directions of rain water (and spilled oil paths). As required under this section, this Facility diagram indicates the location and contents of each container. Also listed are the UST's (otherwise exempted), all transfer stations and connecting pipes.

Spill kits are utilized to clean-up minor spills and their locations are shown on **Figure 2, Appendix B**. Plant personnel are utilized to handle all but the largest spills. See **Section 8.0** of this Plan list for clean-up contractors. The spill notification contacts are also provided in this section.

- (4) See **Appendix C**, Spill Incident Reports, which must be filled-out in conjunction to reporting a spill report to the proper notification contacts. This will help remind the operator of the procedures which must be followed and the information which must be furnished.

9.1 POTENTIAL EQUIPMENT FAILURES RESULTING IN SPILLS 112.7 (b)

The following table discusses potential equipment failures at the facility. Specific tanks discussed can be located in **Section 7.0** and on **Figures 2-33, Appendix B**.

Potential Event	Spill Description	Volume Released	Spill Rate
Complete failure of a full tank or tanks	Spills from largest above ground tank to secondary containment	Up to 1,500 gallons	Instantaneous
Partial failure of a full tank or tanks	Spill from tank to secondary containment	1 to 1,500gallons	Gradual to instantaneous
Tank overfill	Spill from tank to secondary containment	1 to several gallons	Gradual
Pump delivery pipe failure	Spill from bulk truck delivery would occur indoors within the plant or in the tank secondary containment system. A release from the loading of USTs could flow overload to the storm sewer system and eventually reach Stump Lake.	Up to 2,500 gallons	Instantaneous up to 50 gpm
Leaking pipe or valve packing	Contained within plant or secondary containment area	1 – 100 gallons	Gradual up to 10 gpm
Delivery truck leak or failure	Spill from bulk truck delivery would occur indoors within the plant or in the tank secondary containment system. A release from the loading of USTs could flow overload to the storm sewer system and eventually reach Stump Lake.	Up to 2,500 gallons	Instantaneous up to 50 gpm

Potential Event	Spill Description	Volume Released	Spill Rate
Hose leak during truck unloading	Spill from bulk truck delivery would occur indoors within the plant or in the tank secondary containment system. A release from the loading of USTs could flow overload to the storm sewer system and eventually reach Stump Lake.	1 – 100 gallons	Instantaneous up to 10 gpm
Pump rupture or failure	Spill from bulk truck delivery would occur indoors within the plant or in the tank secondary containment system. A release from the loading of USTs could flow overload to the storm sewer system and eventually reach Stump Lake.	Up to 2,500 gallons	Instantaneous up to 50 gpm

10.0 CONTAINMENT AND DIVISIONARY STRUCTURES - 40 CFR 112.7(c)

- (1) Secondary containment equal to the capacity of the largest tank within the containment structure is provided for all existing above-ground storage tanks on the campus. However, secondary containment is not provided for transformers.
- (2) The loading and unloading areas for tank trucks are not curbed to provide secondary containment as it is not practical.
- (3) Surface drainage at the facility is engineered so that a minor oil spill outside the diked or curbed area at the facility will pond on-site. However, a large release could flow over land to the storm sewer system and discharge to Stump Lake.
- (4) Sorbent pads, booms, or other barriers and cleanup tools are available from the spill kit stations located in the Power Plant (see **Figure 2, Appendix B**). Sawdust piles exist on-site from wood processing activities at the woodshop. Sand is available in stockpiles near the garage.
- (5) During bulk unloading, weighted vinyl mats are available to cover storm sewer inlets in the drainage area.

11.0 DEMONSTRATION OF FACILITY PRACTICABILITY - 40 CFR 112.7(d)

Facility management has determined that use of the containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility.

12.0 INSPECTIONS AND RECORDS - 40 CFR 112.7(e)

Weekly visual assessments consist of a complete walk through of the facility property to check for tank damage or leakage, stained or discolored soils and excessive accumulation of water in diked areas. Plant personnel are trained to report any visible release immediately. Mobile equipment is also visually assessed by operators to insure it is not leaking.

The checklist provided in **Appendix E** is used during monthly inspections. These inspections are performed in accordance with written procedures developed for the facility by the owner or operator. Written inspection procedures and monthly inspections are signed by the inspector and maintained with this plan for three years (see **Appendix E**).

Inspections of hydraulic elevator reservoirs are completed monthly by a Schindler Elevator Corporation technician. An oil log form is kept in each elevator room to comply with operating codes. Any leakage would be recorded on this form and reported to St. John's staff. A copy of this form is included in **Appendix E**.

St. John's University Physical Plant staff checks each transformer for evidence of leakage at least monthly. Annually, each transformer is closely inspected for leaks by opening the doors. Any leaks are promptly corrected.

The underground storage tanks (USTs) containing motor fuels at the garage are tightness tested annually and monitored to comply with state and federal regulations covering these tanks. The fuel oil USTs at the power plant have float-type gauging equipment with remote reading to the power plant.

13.0 PERSONNEL, TRAINING, SPILL PREVENTION PROCEDURES - 40 CFR 112.7(f)

- (1) Facility personnel have been instructed by management in the operation and maintenance of oil pollution prevention equipment and pollution control laws and regulations.
- (2) The Environmental Health and Safety Director, Ganard Orionzi, is accountable for oil spill prevention at St. John's University.
- (3) Yearly spill prevention briefings are provided by management for operation personnel to ensure adequate understanding of the SPCC plan. These briefings highlight any past spill events or failures and recently developed precautionary measures. Training has been held on oil spill prevention, containment, and retrieval methods. Future exercises with possible simulated spills will be periodically held to prepare for possible spill response. Records of these briefings and spill prevention training are kept on a similar form shown in **Appendix D**. Instructions and phone numbers regarding the reporting of a spill to the National

Response Center and the state are listed in **Section 8.0** and have been publicized and posted in the office.

14.0 SECURITY - 40 CFR 112.7(g)

- (1) The facility is occupied by monastic and maintenance personnel 24 hours per day, 365 days per year. Key access points to fuel tanks are locked.
- (2) The master flow and drain valves are locked in the closed position when in non-operating or standby status.
- (3) The electrical starter controls for the oil pumps are locked when the pumps are not in use.
- (4) The loading and unloading connections of the USTs from the bulk truck delivery area are capped when not in service or when in standby service for an extended time.
- (5) Security lights are located so as to illuminate the office and storage areas. Consideration in the location of the lights was given in order to discover spills at night and prevent spills occurring through vandalism.

15.0 TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK - 40 CFR 112.7(h)

- (1) The tank truck and tank car loading and unloading procedures meet the minimum requirements of the U.S. Department of Transportation (49 CFR 177.83). Curbing is currently not installed at the vehicle loading/unloading area as it is impractical.
- (2) Warning signs and chock blocks are provided at the loading/unloading areas to prevent premature vehicle departure. The transport driver is constantly in attendance during all fuel or fuel oil unloading activities.
- (3) The lowest drain and all outlets on tank trucks are inspected prior to filling and departure.

16.0 FIELD CONSTRUCTED TANKS – 40 CFR 112.7 (I)

There are no field constructed tanks at this Facility.

17.0 STATE OF MINNESOTA REQUIREMENTS – 40 CFR 112.7 (J)

Minnesota rules require the following:

- (1) The registration of all above ground storage tanks with a capacity larger than 500 gallons with the exception of exempt ASTs. Several of the ASTs at St. John's University listed in this SPCC plan are exempt.
- (2) All regulated tanks and piping must be labeled. All regulated tanks and major product pipelines are labeled.
- (3) All regulated ASTs must have secondary containment by November 1, 2003. All regulated tanks at St. John's University have secondary containment or are located indoors.
- (4) Tank monitoring for leaks is required. St. John's University conducts monthly monitoring for leaks at a minimum. All tanks are located in diked areas with surfaces meeting the maximum permeability standard or are located indoors.
- (5) Corrosion protection is required on requested ASTs exceeding 1100 gallons in capacity. St. John's University ASTs meet this requirement by having ASTs elevated, located on draining concrete pads or within secondary containment systems that are inspected and pumped when necessary.
- (6) Spill containment in transfer areas is required for ASTs exceeding 1100 gallons, or is filled not using a handheld nozzle or pipeline between tanks on-site.
- (7) Overfill protection is required on all regulated ASTs exceeding 1100 gallons capacity. St. John's University employs overfill protection through fixed level gauges or level stick monitoring during substance transfer.
- (8) The following record keeping requirements are in effect for all regulated ASTs exceeding 1100 gallons:

Tank Records Required for Tank Life

Some AST records must be kept for the life of the tank. They include:

- maintenance and repair documentation of tank systems;
- third-party certifications of any system equipment;
- as-built drawings of tank foundations, tank bottom designs, volume and design of the secondary containment basin including dike walls and the area directly under the tank (certified by a professional engineer for field-erected tanks) for those installed after November 1, 1998;

Tank Records Required for Three Years

Some AST records must be retained for three years. They include:

- all documentation addressing service check and equipment calibrations on tank systems;
- all periodic monitoring activities such as the name of the person conducting the monitoring, methods used, the monitoring dates and the monitoring results; and
- records demonstrating compliance with out-of-service tank requirements that are kept by the AST owner who took the tank out of service, the current owner or operator of the site, or the MPCA if the records are mailed to the agency and cannot be kept at the closed facility.

18.0 GENERAL REQUIREMENTS – 40 CFR 112.8 (A)

The general requirements for the Plan under the regulation have been met.

19.0 FACILITY DRAINAGE - 40 CFR 112.8 (b)

In the event of a spill from a tank, the oil should be contained within secondary containment devices. If a spill occurs during transfer or in a manner that cannot be contained in secondary containment, the material is in the drainage area as indicated in **Figures 2-3, Appendix B**. Facility drainage from diked and undiked areas with the potential of receiving spilled oil would terminate at Stump Lake on the west side of the Property. Currently, facility drainage systems appear to be engineered to prevent oil from reaching navigable water in the event of equipment failure or human error.

20.0 BULK STORAGE TANKS - 40 CFR 112.8 (c)

- (1) Each aboveground storage tank is of steel construction and is compatible with the petroleum and other products they contain and conditions of storage. No internal heating coils are in operation in any tank at the facility.
- (2) All aboveground tanks have concrete dikes for secondary containment with a volume greater or equal to 100 percent of the largest single tank, except for indoor tanks and transformers (see Tables in **Section 7.0**). Portable tanks are not used at the facility. None of the secondary containment systems are exposed to precipitation.
- (3) Rainwater does not collect in secondary containment areas. Therefore there is no effluent discharge to navigable waters.
- (4) There are no partially buried tanks at the facility.

- (5) The double walled aboveground tanks are elevated or have interstitial monitoring. Comparison records are maintained. Visual inspections are performed according to the procedure located in **Appendix E** and include inspection of tank supports and foundations.
- (6) Tanks 1, 2, 5 and 6 (all USTs) have float level indicators and leak detection systems in use. Tanks 3 and 4 have direct reading-level gauges. Tank 7 is checked with a stick-level gauge prior to filling.
- (7) Oil leaks which result in a loss of oil from tank seams, gaskets, rivets, and bolts are promptly corrected.

21.0 TRANSFER OPERATION, PUMPING, AND IN-PLANT PROCESSES - 40 CFR 112.8(d)

- (1) There is a short run of buried piping adjacent to the power plant. See **Figure 2, Appendix B**.
- (2) Pipelines not in service or on standby for an extended period are capped or blank flanged and marked as to their origin.
- (3) All pipe supports are properly designed to minimize abrasion and corrosion and to allow for expansion and contraction.
- (4) All aboveground pipeline and valves are examined monthly to assess their condition.
- (5) Warning signs are posted as needed to prevent vehicles from damaging aboveground pipelines.
- (6) A steel pan is used under the dispenser pump and hose reel to catch any losses from fittings in these devices.

22.0 RULE SECTIONS NOT APPLICABLE

The following sections of the rule are not applicable to this Facility:

- On-shore drilling and workover facilities – 40 CFR 112.10
- Off-shore drilling and workover facilities – 40 CFR 112.11
- Requirements for other oil products – 40 CFR 112.12

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APPENDIX A

APPENDIX A

Facility Name: The Order of St. Benedict, St. John's University
Facility Address: Collegeville, MN 56321

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes _____ No X
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?
Yes _____ No X
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable (formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II and III to DOC/NOAAs "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, Section 10, for availability) and the applicable Area Contingency Plan.
Yes _____ No X
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake²?
Yes _____ No X
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes _____ No X

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

²For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

CERTIFICATION

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

Signature

Corporate Treasurer

Title

Brother Benedict Leuthner, OSB

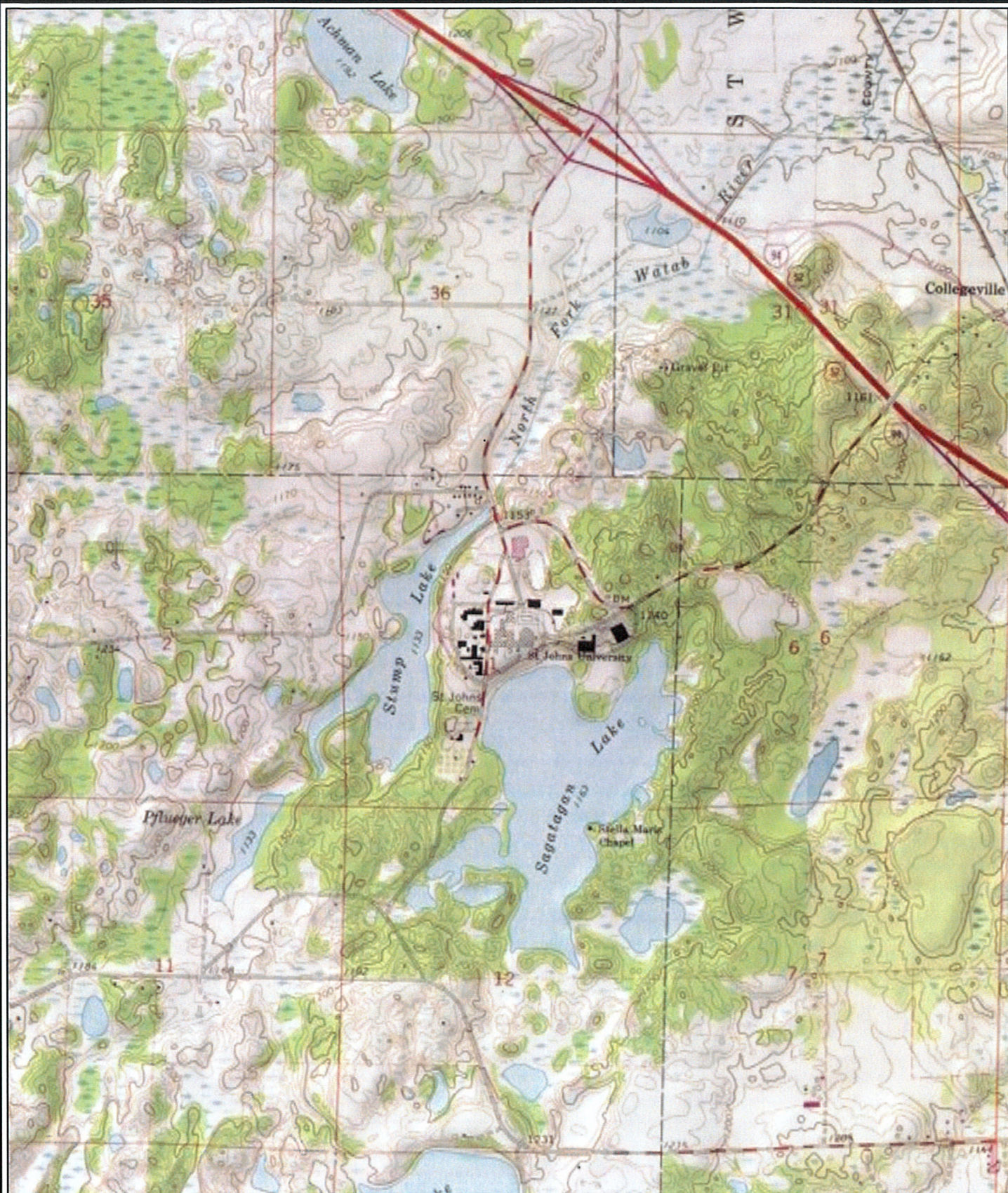
Name

Date

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APPENDIX B

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Source: MS Virtual Earth Topographic Quads
Projection: NAD83 UTM Zone 15N

0 2,000 4,000 Feet 1:24,000
1 Inch = 2,000 Feet



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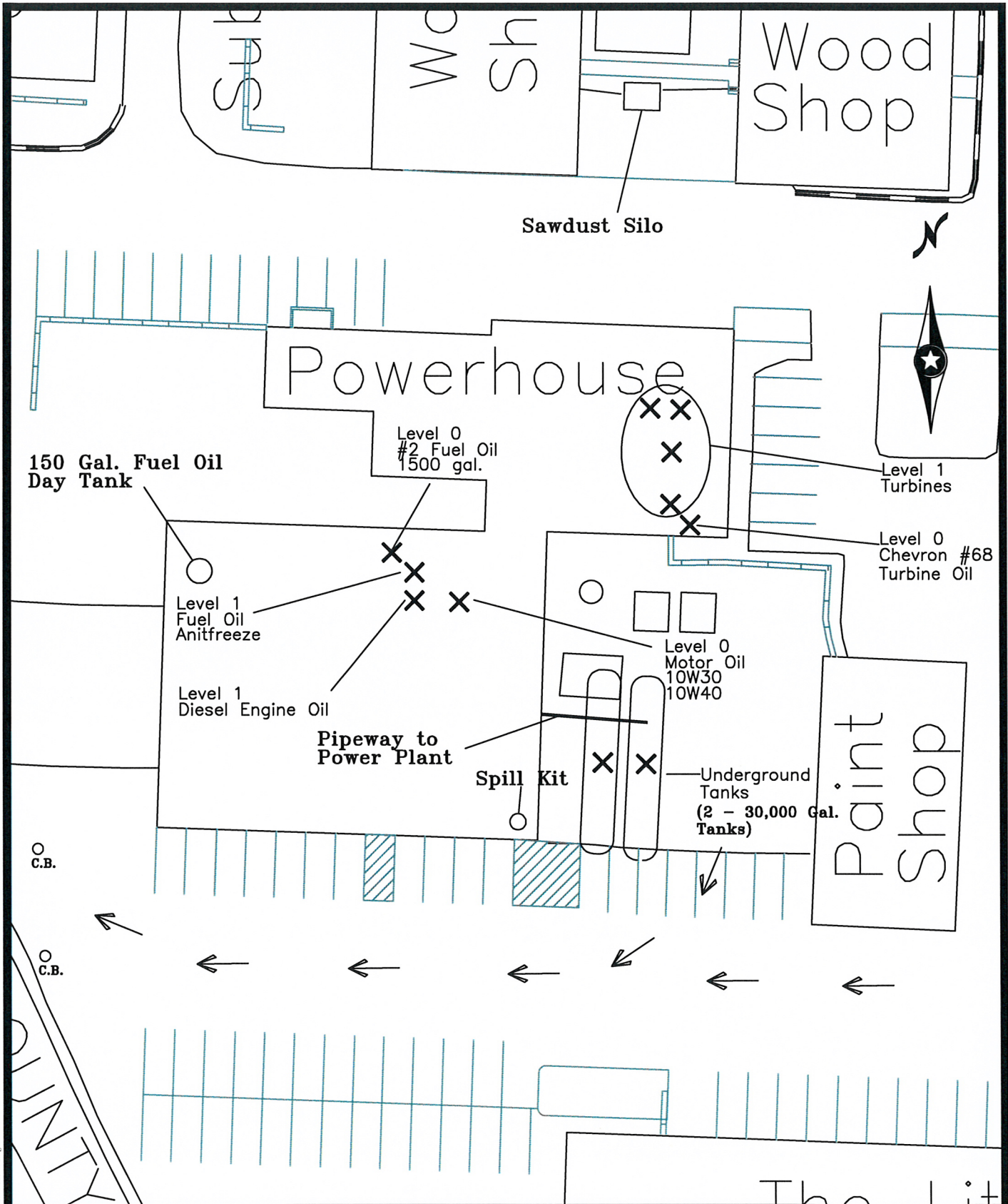
Minneapolis • Chicago • Los Angeles • Madison • Milwaukee • Phoenix

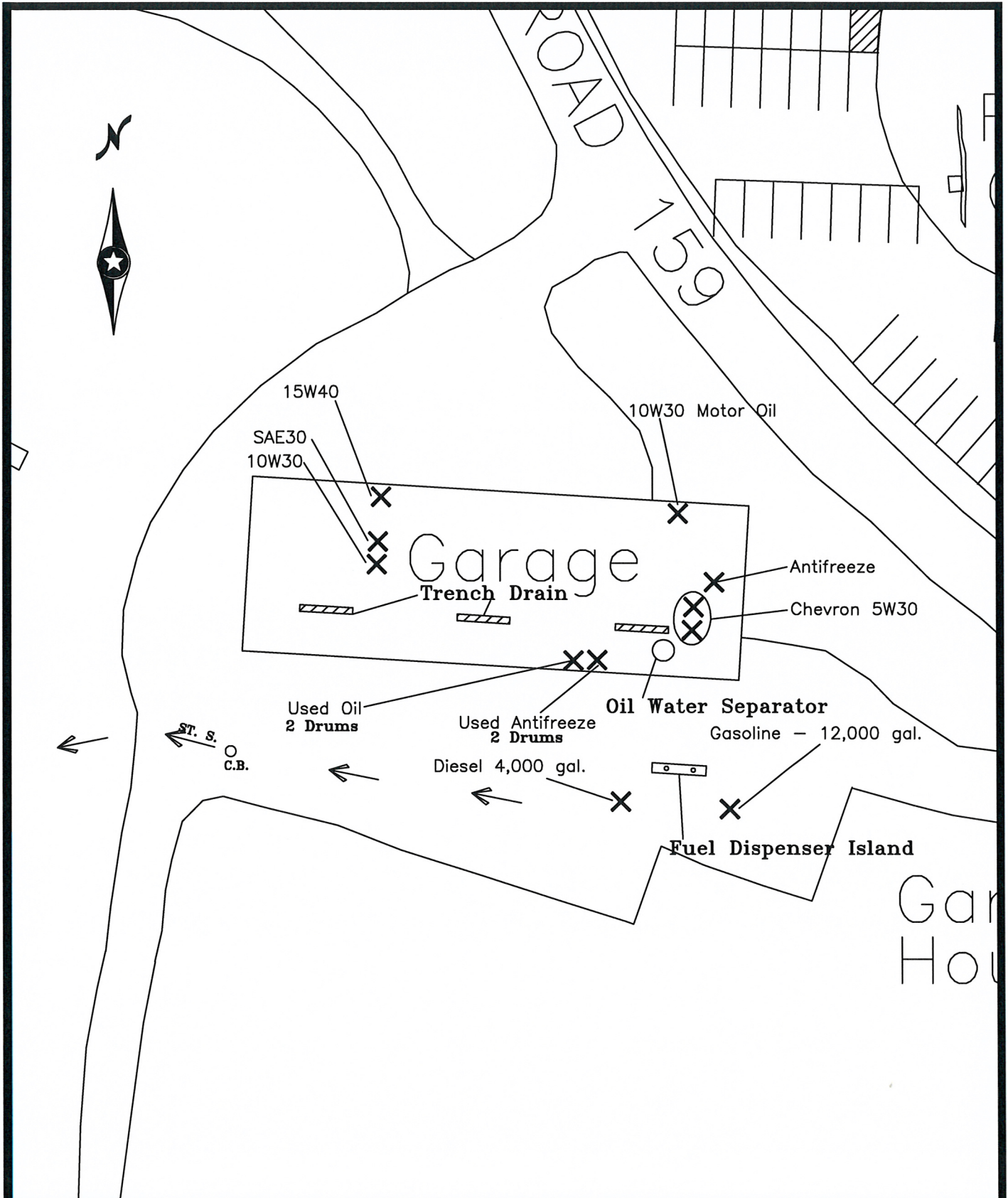
Order of St. Benedict/St. John's University

Apr 10

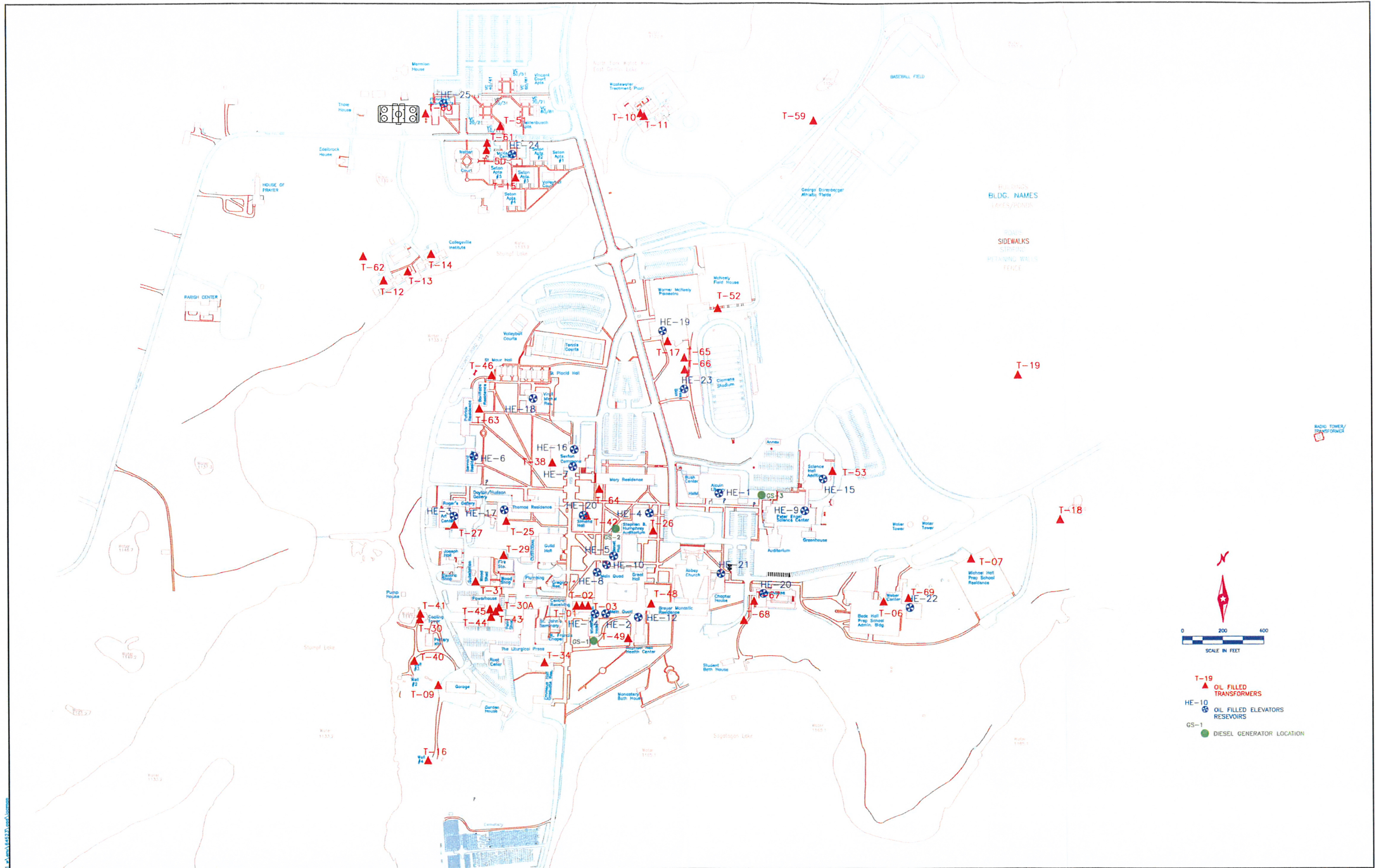
Property Location Map

Figure
1





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4				DESIGNED	DATE	I hereby certify that this plan, specification, or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the State of Minnesota. Date: _____ Reg. No. _____	Order of St. Benedict of St. John's University 6000 Glaholt Dr. Suite 205 Madison, WI 53718 (608) 278-1535 13406 16th Avenue N Minneapolis, MN 55441 (763) 409-5100 4500 N. Miller Rd., Suite 211 Southdale, MN 55105 (495) 441-0555	SCALE	Location of Hydraulic Elevators, Oil Filled Transformers and Diesel Generators	SHEET	REV.
3				DRAWN	DATE			AS SHOWN			
2				ric	April '10			PROJECT NO.			
1				APPROVED	DATE			64523.00			
NO.	DATE	BY	REMARKS								

APPENDIX C

The Order of St. Benedict
St. John's University
Collegeville, Minnesota
(320) 363-3267

SPILL RESPONSE FORM

This form is to be used by the Emergency Responder when responding to a spill.

Time: _____ Date: _____

Location of spill: _____

Cause of spill: _____

Name and quantity of material spill: _____

Direction flow of spill: _____

Possible hazards to human health or environment: _____

Extent of injuries: _____

Describe response action: _____

Name, address and phone # of responsible party: _____

Emergency Response Coordinator name: _____

If a petroleum product spill exceeds five (5) gallons, call the Minnesota Pollution Control Agency at (800) 422-0798.

Add additional pages if required.

APPENDIX D

APPENDIX D

RECORD OF SPILL PREVENTION BRIEFINGS AND TRAININGS

Facility Name: **The Order of St. Benedict of St. John's University**
Facility Address: **Collegeville, Minnesota**

Instructions: Briefings will be scheduled and conducted by the Owner or Facility Property Manager for operating personnel at least once a year to assure adequate understanding of the Plan for this Facility. A copy of this form of Record of Spill Prevention Briefings and Training will be completed by the person conducting the briefing and training and kept with other Plan records in the office of the Facility Property Manager. These briefings should also highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of fuel and applicable pollution control laws, rules, and regulations. During these briefings there will be an opportunity for personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the Facility.

Date: _____

Attendees: _____

Subjects and Issues: _____

Recommendations and Suggestions: _____

APPENDIX E

APPENDIX E

FACILITY INSPECTION CHECKLIST

Instructions: This inspection record will be completed every month. Place an X in the appropriate box for each item. If any response requires elaboration, do so in the Descriptions and Comments space provided. Further descriptions or comments should be attached on a separate sheet of paper if necessary.

	Yes	No	NA	Location, Description and Comments
Tank surfaces show signs of leakage				
Tanks are damaged, rusted or deteriorated				
Bolts, rivets, or seams are damaged				
Tank supports are deteriorated or buckled				
Tank foundations have eroded or settled				
Level gauges or alarms are inoperative				
Vents are obstructed				
Valve seals or gaskets are leaking				
Pipelines or supports are damaged or deteriorated				
Buried pipelines are exposed				
Loading/unloading rack is damaged or deteriorated				
Connections are not capped or blank-flanged				
Secondary containment is damaged or stained				
Dike drainage valves are open				
Retention ponds functioning properly				
Retention ponds have a sheen				
Fencing, gates, or lighting is non-functional				
Other				

Remarks: _____

Signature: _____

Date: _____