

## Accidental Spill Prevention Plan (ASPP)

### A. General Company Policy

#### A.1. Purpose.

The purpose of this program is to inform interested persons, including employees, that our facility, Brigham Young University - Idaho, is complying with Rexburg City's requirements for preparing and maintaining a Accidental Spill Prevention Plan (ASPP) under the industrial Wastewater Discharge Permit, by providing a written plan that describes the equipment, manpower, procedures, and adequate countermeasures for preventing and controlling hazardous materials spills entering the city wastewater system.

#### A.2. Applicability.

This plan applies to all work operations at our campus locations where employees may use or be exposed to potential hazardous materials discharge situations under normal working conditions or during an emergency situation.

#### A.3. Responsibility.

Eric J. Harmston, Sr., the University Safety Officer, is responsible for this plan and for making sure that the plan is available to the City of Rexburg for on-site review during normal working hours. Copies of the written plan are located in the University Safety Office and online at <http://www.byui.edu/Safety/Policies/Policies.htm>.

The facility owners' name and address is as follows:

The Church of Jesus Christ of Latter-Day Saints  
Board of Trustees  
Church Office Building  
Salt Lake City, Utah

Facility contacts for this plan include the following:

<b>Contact name:</b>	<b>Title:</b>	<b>Telephone number:</b>
Eric J. Harmston, Sr.	University Safety Officer	208-496-2457
Charles Anderson	Physical Facilities Director	208-496-2451
Wayne Clark	Asst. Dir. Physical Facilities	208-496-2456

A.4. Plan Review and Certification

(Reserved)

A.5. Plan Review and Evaluation.

BYU-Idaho will amend this ASPP Plan when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge. The amendment will be prepared within six months of the change. Examples of changes that may require amendment to the Plan include, but are not limited to:

- Commissioning or decommissioning containers;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures;
- Changes of product or service; or

BYU-Idaho reviews this Program at least every three (3) years from the date of issuance and every three (3) years from the date of the last review. Amendments are then prepared within six months of the review.

Following are the review dates and certifications:

The following persons attest that each has completed the review and evaluation of the ASPP program for Brigham Young University – Idaho, as indicated below:

<b>Review date:</b>	<b>Reviewer name:</b>	<b>Reviewer signature:</b>	<b>Review and evaluation will amend as a result? (Yes/No)</b>

A.6. Worker Attendance.

Our facility is normally attended by workers 24 hours per day, 365 days per year.

A.7. Informed Employees.

As a result of proper program maintenance, our employees will be informed of the equipment, manpower, procedures, and steps to prevent and control any hazardous materials spills.

**A.8. Plan Suggestions.**

We encourage any suggestions that our employees have for improving our written ASPP Program, as we are committed to developing and maintaining an effective plan. We strive for clear understanding, safe behavior, and involvement in this program from every level of the university.

**A.9. Management Approval.**

BYU-Idaho is committed to the prevention of discharges of hazardous materials to wastewater streams as well as the environment. This ASPP Program has the full approval of management at a level of authority to commit the necessary resources to fully implement it.

Authorized University Representative: Eric J. Harmston, Sr.

Title: University Safety Officer

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**B. Discussion of Facility's Conformance with Permit**

BYU-Idaho takes the prevention of environmental contamination very seriously. In setting up the storage areas for hazardous materials, each of the liquid containers is placed in a secondary container or containment area for the prevention of any spills to be released to the environment.

BYU-Idaho has established and maintains this ASPP Program in compliance with codes and regulations and to help ensure the prevention of contamination of the environment from our hazardous materials storage locations.

**C. Facility Layout/Diagram and Important Emergency Contacts.**

The physical layout of the university is described as follows:

BYU-Idaho is situated on the South side of Rexburg Idaho. It covers several acres and is comprised of 37 buildings, various playing fields, parking lots, and open areas.

**D. Spill Prevention Mitigation**

D.1 Our discharge prevention measures, including routine handling of products, are as follows:

- All above ground tanks are in secondary containments designed to hold 110% of the largest tanks.
- All under ground storage tanks were installed in compliance with applicable regulations and codes. They are monitored as prescribed by regulation.

- All small quantity hazardous materials liquid containers are stored in a manner to prevent discharge into the wastewater system or the environment in the event of a spill.
- All storage areas are inspected on a regular basis to ensure compliance with the hazardous materials storage regulations.

D.2 Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor) include:

- All small quantity spills are quickly contained and cleaned up. The contaminated hazardous materials are kept at the hazardous waste site in 5 gallon bucket(s) until collection by a certified hazardous materials collection and disposal company and/or disposed of in compliance with federal and state regulations.
- Any large quantity spills are also quickly contained. The bulk of it is transferred into either 5 gallon buckets or 55 gallon DOT drums for storage until removed by a certified hazardous materials collection and disposal company. That portion of the spill that can be used as originally designed will be transferred to a properly labeled DOT container and then used as a viable product.
- The residue materials is cleaned up and the area returned to previous condition, as best as can be accomplished.

D.3 Our method of disposal of recovered materials is:

- Recoverable hazardous materials are placed in labeled containers and used as designed.

D.4 The following is a list of important contacts, in the event of a discharge:

<b>Contact:</b>	<b>Telephone number:</b>
Eric Harmston	201-1832 or 745-0556
Byron Gilbert	313-6255 or 356-7863
Wayne Clark	496-2456 or 745-8678
Charles Andersen	496-2451 or 359-1611

## **E. Emergency Procedures**

E.1 Procedures and information for a discharge are listed below:

E.1.a Small Spill  $\leq$  10 gallons

- BYU-I Safety Office will be notified within 24 hours of the spill.
- The spill is to be contained immediately upon discovery.

- The spill will be cleaned up and place the contaminated materials in a 5 gallon bucket for retrieval and disposal by properly trained personnel. Absorbent material will be used to soak up the residue material.
- Collected material will be disposed of in accordance with Federal and State regulations.
- Depending upon the materials spilled a spill report is to be completed and submitted to the safety office within 48 hours of the spill clean-up.

#### E.1.b Medium Spill – $10 \leq 1,000$ gallons

- BYU-I Safety Office will be notified immediately upon discovery of the spill.
- If the spill involves the city wastewater collection system, the city will also be notified immediately of the size and type of materials spilled, along with location and any possible contamination to the system.
- The spill will be contained immediately.
- Absorbent material will be used to collect the liquid materials.
- Dry materials will be collected into a double thick garbage bag and tied to contain it.
- The residue will be neutralized in compliance with the manufacturers recommendations, as found on the MSDS.
- Any materials that can be recovered will be placed in a labeled container for reissuing.
- All contaminated materials will be placed in either a 5 or 55 gallon container and placed at the Hazardous Waste Site to await collection and disposal by a certified hazardous waste disposal company.
- A spill report will be filled out and submitted to the BYU-I Safety Office within 48 hours of the clean-up of the spill. A copy will be made available to the city upon request.

#### E.1.c Large Spill - $> 1,000$ gallons (EPA Reportable)

- BYU-I Safety Office and the city will be notified immediately upon discovery.
- The BYU-I Safety Office will notify EPA and other government agencies of the spill and subsequent actions being taken to contain, dispose and mitigate future incidents.
- The spill will be contained immediately.
- All material that can be recovered will be placed in a suitably labeled container for use.
- The remaining contaminated material will be collected in either 5 or 55 gallon containers, labeled and placed at the Hazardous Waste site to await collection and disposal by a certified hazardous waste disposal company.
- A spill report will be filled out and submitted to the BYU-I Safety Office.

## F. Post Incident Procedures.

### F.1. Fault Analysis.

BYU-Idaho believes that reasonable potential exists for equipment failure (such as tank overflow, rupture, or leakage) at our facility. The following is a prediction of the direction, rate of flow, and total quantity of hazardous materials that could be discharged from the facility as a result of each major type of failure:

The general direction of flow is to the North West of campus, however, the direction of flow from each tank will depend on the location of the tank.

The amount of hazardous materials that could be released from any one of the above ground tanks will not exceed 1500 gallons from our largest above ground storage tank.

### **G. Secondary Containment.**

At BYU-Idaho, we have installed the following structures and equipment to help prevent a discharge of hazardous materials:

Each of the above ground tanks that are not considered to be DOT transport containers are in a secondary containment that is designed to hold at least 110% of the hazardous materials in each tank.

### **H. Contingency Planning.**

#### **H.1. Impractical to Install Discharge Preventive Structures and Equipment.**

This area does not apply.

#### **H.2. Spill Contingency Plan.**

Because there is reasonable potential at BYU-Idaho for an equipment failure (such as tank overflow, rupture, or leakage) that could result in a discharge of hazardous materials, we believe it is important to have a strong contingency plan in place should a hazardous materials discharge occur.

Our contingency plan will be implemented if an incident occurs that might threaten human health or the environment. This includes the threat of a discharge as described above. The University Safety Office has full authority to make this decision.

Our plan relies on a variety of individuals, organizations, and agencies to carry out hazardous materials removal operations. Our plan also clearly defines the authorities, responsibilities, and duties of state and local governmental agencies to avoid unnecessary duplication of contingency planning activities and to minimize the potential for conflict and confusion that could be generated in an emergency situation as a result of any duplication.

Our contingency plan lists and describes the roles of the individuals who are responsible for responding to an hazardous materials discharge. It also contains well-defined and specific actions that should be taken after discovery and notification of an hazardous materials discharge.

#### **H.3. Commitment of Manpower, Equipment, and Materials.**

In addition to a contingency plan, we maintain a written commitment of manpower, equipment, and materials to help us control and remove any harmful quantity of hazardous materials discharged.

### **I. Facility Inspections and Records.**

University Safety Office is responsible for conducting facility inspections and tests, and maintaining inspection records (signed by the appropriate supervisor or inspector) with the ASPP Program for a period of three years. Records of inspections and tests that are kept under usual

and customary business practices will suffice.

The University Safety Officer is responsible for developing written procedures and maintaining them with this ASPP Program for a period of three years.

#### **J. Personnel Training and Spill Prevention Procedures.**

BYU-Idaho is committed to providing proper and regular instruction for hazardous materials-handling personnel in the operation and maintenance of equipment to prevent discharges of hazardous materials, discharge procedures protocols, general facility operations, and the contents of the facility ASPP Program.

In addition, we are committed to providing proper and regular instruction of hazardous materials-handling personnel in applicable pollution control laws, rules, and regulations.

The Safety Office and the Physical Facilities Department is responsible for ensuring that hazardous materials-handling employees are properly instructed in the operation and maintenance of equipment to prevent hazardous materials discharges, discharge procedures protocols, general facility operations, the contents of the facility ASPP Plan, and applicable pollution control laws, rules, and regulations.

The Safety Office and the Physical Facilities Department is responsible for overseeing discharge prevention activities.

The Safety Office is responsible for reporting on the progress of discharge prevention activities to facility management.

The Safety Office and the Physical Facilities Department is responsible for conducting discharge prevention briefings at least once a year for hazardous materials-handling personnel to ensure adequate understanding of the facility ASPP Plan.

#### **K. Facility Security (Excluding Hazardous materials Production Facilities).**

At BYU-Idaho, we have established security measures for all facilities that handle, process, or store hazardous materials.

We employ the following procedures when valves permitting direct outward flow of the container's contents to the surface are in non-operating or non-standby status:

- The valves are tagged and either repaired or replaced in a quick and timely fashion. The pumps that would supply hazardous materials to those valves would be locked and tagged as out of service until repairs are made.

We employ the following procedures when the hazardous materials pump starter controls are in non-operating or non-standby status:

- The pump is locked and tagged out until either repaired or replaced by a qualified electrician.

The following are the procedures for the operation of hazardous materials pipeline or

facility piping loading/unloading connections when not in service or when in standby service for an extended time:

- They are locked and tagged out to not allow access. All valves in connection with the faulty valve or pipeline will be closed and locked.

We maintain sufficient lighting that is appropriate for an individual facility, its location, and its security risks.

#### **L. Facility Tank Truck Loading/Unloading.**

We utilize the following procedures when loading and unloading tank cars and cargo tanks or tank trucks:

Only those who are qualified by the supplier are allowed to unload product on site. When a non-qualified delivery person is discovered, that person will be instructed to stop their activity and the delivery company will be notified that he/she will not be allowed to make another delivery to this location until he/she has received proper, documented, training in proper delivery of the product.

#### **M. Brittle Fracture Evaluation Requirements.**

If a field-constructed above ground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged hazardous materials or failed due to brittle fracture failure or other catastrophe, the Safety Office and the Physical Facility structural and welding department will evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action. If the container can be repaired it will be, otherwise it will be replaced.

#### **N. Conformance with General Federal and State Requirements for Spill Prevention, Control, and Countermeasure Plans.**

This program is in compliance with Federal, State, and Local requirements for the prevention of hazardous materials entering the environment through spillage at this facility.