SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

Prepared for:

Elizabethtown College
Elizabethtown, PA 17022

Prepared by:
W. Michael Bierbower
Elizabethtown College
One Alpha Drive
Elizabethtown, PA 17022

August 28, 2007

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Prepared for:

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Professional Engineer Certification

I hereby certify that I am familiar with the site, and being familiar with the provisions of 40 CFR Part 112, I can attest that this SPCC Plan has been prepared in accordance with good engineering practices, procedures for required inspections and testing have been established, and the Plan is adequate for the facility.

Engineer: W. Michael Bierbower, P.E., CSP, CHMM

Signature: _____

License No. PE0Z0801E State: Pennsylvania

Date: August 28, 2007

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1.0 REQUIREMENTS OF THE SPCC PLAN

This Spill Prevention, Control and Countermeasure (SPCC) Plan for Elizabethtown College has been prepared in accordance with the Code of Federal Regulations, 40 CFR Part 112. The SPCC Plan addresses storage tanks, drum storage areas, and piping and equipment that are used for oil, as defined in 40 CFR §112.2. This SPCC Plan does not address the entire inventory of products (i.e., products other than oil) that have been or are currently stored at the facility.

This Plan will be updated when any of the following occur:

- A change in facility design, construction, operation and maintenance occurs that materially affects the potential for discharge;
- Changes in site conditions occur that materially affect the content of the Plan;
- A spill or release occurs (>1,000 gallons single discharge or 2 discharges >42 gallons within 12 months);
- Sources covered under the Plan are added or deleted.

The changes will be made to the Plan within six months of those changes taking place. Following any technical changes, the SPCC must be reviewed and approved by a registered Professional Engineer (PE). A PE certification is not required for non-technical changes to the Plan.

If there are no changes, the SPCC should be reviewed and updated every five years.

	Review Dates	**Signature**
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

A complete copy of the SPCC Plan will be maintained at the facility. The SPCC Plan will also be available to the Regional Administrator for on-site review during working hours.

Management Approval

This Spill Prevention Control and Countermeasure Plan is approved by the management of Elizabethtown College and will be implemented as described herein.

Signature: _____ Name: David B. Dentler

Title: VP of Administration Date: April 30, 2007

2.0 FACILITY DESCRIPTION

2.1 Facility Physical Layout and Description

Elizabethtown College is located on College Avenue, Elizabethtown, PA 17022. The faculty is accessible by taking Route 743 South from Route 283. Proceed 1.5 miles on Route 743 to Route 230 (Market Street). Turn left onto Market Street. Proceed through town to College Avenue. Turn left and go 3 blocks to the Elizabethtown College.

Elizabethtown College is an educational facility that has a current enrollment of about 1,900 full-time students. Elizabethtown College is a 139-acre campus consisting mainly of classroom buildings, administrative buildings, plant operations and residence halls. Elizabethtown College owns and operates approximately 20 buildings over the 139-acre campus.

The facility uses natural gas to heat most college buildings and electricity to heat the remainder of the buildings. Oil, stored in 275 gallon tanks, is used to heat 9 homes owned by the College. These residences are located on the perimeter of the campus. In addition, there is a 275 gallon diesel fuel tank used to service various equipment. There is a 1000 gallon gasoline UST located at the Brown Building to service the fleet and other vehicles. The College also has pad mount transformers and elevators that contain oil.

In addition to the storage tanks described above there are up to two 55 gallon drums of used motor oil and a 30 gallon used refrigerant oil drum in Founder's Hall B wing boiler room. Additionally, there is a 300 gallon tank of used vegetable oil located by the loading dock of the Student Center.

The College has two hydraulic compactors. One is located at the Dining Hall and the other at the Brown Bldg. Both have reservoirs of about 25 gallons.

The U.S. EPA identification number for Elizabethtown College is PAD887272291.

2.1.1 Name and Address of Owner or Operator

Elizabethtown College
One Alpha Drive
Elizabethtown, PA 17022

2.1.2 Oil Spill History at this Site

Elizabethtown College has been at the present location since 1900. The only oil spill of record occurred in the mid 1980s. A boiler feed line was ruptured while trenching. An unknown quantity of oil was spilled. Subsequent testing of the ground and ground water at that location revealed concentrations of petroleum related substances below the permissible levels.

2.1.3 Plan Elements Not Currently in Place

None; all Plan elements are currently in place.

2.2 Oil Storage Inventory

Attachment 2 provides the college layout and site sketches depicting the areas where the outside and inside tanks are located. *Attachment 3* provides a listing of oil storage tanks, their location, materials of construction, capacities, and the primary products stored.

Generally, much of the site to the east slopes or runs to Lake Placida. Much of the western part of the site slopes towards the Dell.

2.3 Discharge Prevention

The only underground storage tank (UST) on the site is a 1000 gallon gasoline tank used for fueling the fleet and other vehicles. The tank is a double walled steel tank and is dip sticked manually to detect leaks. Cathodic protection is included on the piping associated with this tank. Spill and overfill protection is also provided for this process. In addition, a curb is installed along the north side of the tank filling area to prevent gasoline from entering the storm drain at that location.

The above ground storage tank (AST) used for storing vegetable oil resides in a room adjacent to the loading dock in the Student Center. There is a spill berm/containment located at the tank to protect against oil reaching any storm drains. There are also spill materials absorbents in the immediate vicinity and on the haz mat vehicle to contain spills if they do occur.

The nine 275 gallon tanks in the off site homes all sit on concrete floors. They are made of 10 and 12 gauge steel and are inspected in the fall when the heating season begins and the spring when it ends. Each tank has a 2" fill line and an inch and a quarter or an inch and a half vent line. Those that fill the tank are required to remain at the fill line until the tank is full. Drip pans have been installed under each of these tanks.

The 275 gallon diesel fuel tank is located in the Pole Barn in a containment of sufficient size to contain the contents of the tank. Material is transferred by the use of a hand pump requiring the operator to be at the location while transferring fuel. The tank truck will be pulled inside the Pole Barn while filling the tank to keep diesel fuel out of the storm drain located outside the building. Drain plugs will be used inside the Pole Barn to protect against the possibility of diesel fuel entering the storm drain.

The two compactors each have a reservoir of about 25 gallons. The hydraulic unit for the compactor at the Dining Hall is located in a diked area sufficient for it's contents. In most cases failure of these units involves the hoses and quick disconnects which reside outside the diked area. The closest storm drain is approximately 200 feet away. There will be sufficient time to respond with absorbents and containments prior to the oil reaching the storm drain.

There are two 55 gallon drums of used motor oil and 30 gallons of used refrigerant oil located on modular spill containment platforms located in the Brown Bldg warehouse and Founder's Hall B wing boiler room respectively

There are 19 pad mounted transformers on campus (see chart). If the transformers rupture the oil from all but three will remain in the vicinity of the transformer. There are storm drains in close proximity to the High Library and Chapel transformers. The Hackman transformer resides on a concrete pad in close proximity to a wet lands. These are storm ducts installed on the appropriate sides of these pads to prevent oil from gaining access to storm drains and wetlands. The transformers are inspected annually for, among other things, signs of leaks. Every other year samples are taken to insure the transformers are operating properly.

The College has 15 elevators containing between 50-100 gallons of oil depending on the size of the elevator and the number of floors in the building. The elevators include the following:

Chapel	Kitchen	Hackman (North)
SME 2	Annenberg	Hackman (South)
Musser	Atrium	Nicarry
Steinman	High Library	Myer Dining
Hoover	Zug	SME 1

The pit and seals are included in the monthly maintenance checks. Additionally, the inspectors check them semi-annually. Each elevator is pressure tested every three years for signs of leaks and failure/rupture. Hydroscopic socks are placed in each of the sump pits.

2.5 Countermeasures

In the event of an emergency, initial notification will be made to the Campus Security Office (1111), which is maintained on a 24-hour, 7-day basis. The Security Office will contact the Director of Facilities and the Director of Environmental Affairs. The Director of Facilities will be responsible for the following:

- Identify the problem
- Take all reasonable measures to stabilize the situation.
- Oversee follow-up activities such as treating, storing and disposing of spill residues

The Director of Environmental Affairs will be responsible for the following:

- Assessing the health and environmental hazards
- Obtaining the services of emergency responders as needed
- Making the necessary notifications to regulatory agencies
- Conducting an investigation and preparing and distributing resulting reports

2.5.1 Oil Storage

The storage containers used for the storage of petroleum products at the facility are constructed of material compatible with the oils being stored. Refer to *Attachment 3* for a summary of the storage tanks, drum storage areas, and transformers containing oil located at the facility.

If a leak were discovered during product storage operations, actions would immediately be taken to minimize further release.

Should a spill occur which could not be easily contained, spill control and cleanup contractors would be called. Regulatory agencies would be notified of spills as appropriate.

2.5.2 Oil Transfer

If a leak were discovered during product transfer operations, transfer operations would immediately stop if this action would minimize further releases. However, if a leak was discovered in a tank truck and transferring the contents to the permanent storage facilities could minimize the release, transfer operations would be expedited.

If a spill were to occur during the filling of the AST(s), booms, absorbent pads, and spill absorbent powder would be placed over and around the released material to restrict the spread of the oil. No. 2 fuel oil is not expected to flow with any appreciable speed.

Elizabethtown College does not believe that a release from oil transfer operations could be of such magnitude as not to be readily containable at the point of release.

2.5.3 Spills

Methods to contain a spill include the quick construction of a barrier to keep the spill from spreading. Sorbent materials and spill kits are located in the Brown Building Warehouse, Brown Bldg haz mat vehicle, Thompson Gym Boiler Room, and the basement of Nicarry.

It is extremely important to prevent the material from flowing into streams, either directly or by storm water discharge pipes. If the spill occurs on paved areas, great effort will be made to keep it on these paved surfaces and not into storm sewers, manholes, or soils.

2.5.4 Post-Incident Cleanup

Cleanup procedures are to be implemented after the spill has been safely contained. The Director of Facilities has overall responsibility for these activities.

The Director of Facilities will also be responsible for follow-up activities such as treating, storing and disposing of spill residues. The Director of Environmental Affairs will be responsible for

preparing necessary notifications/responses to regulatory agencies. He will also be responsible for determining if a spill response contractor will be required to assist in the cleanup.

2.6 Methods of Disposal

Any material requiring disposal will be done in accordance with Pennsylvania State and Federal requirements.

2.7 Contact List

2.7.1 Organizational Structure of the Facility for Implementation

The Plan will be developed and updated by the Director of Environmental Affairs in consultation with the Director of Facilities. Implementation of the Plan is the responsibility of the Director of Facilities.

The duties and responsibilities of the individuals within the organization that will implement the Plan are:

Director of Facilities: Joe Metro
Phone (Work): 717-361-1437
Phone (Home): 717-514-9624
Phone (Cellular): 717-514-9624

Responsibilities: The Director of Facilities is responsible for:

- Management for overall implementation of the SPCC Plan.
- To ensure that all affected employees are trained in the proper handling of suspect spills or leaks and spill events, and that follow-up observations are made to document its effectiveness.
- Suggesting Plan improvements.
- To ensure effective dissemination of the elements of the SPCC Plan to his employees at the facility.
- Keeping equipment required to implement the Plan in proper working order.

Director of Environmental Affairs: Mike Bierbower
Phone (Work): 717-361-1547
Phone (Home): 717-367-5926
Phone (Cellular): 717-468-8013

Responsibilities: The Director of Environmental Affairs is responsible for:

- Reporting SPCC Plan implementation status and failures to the Director of Facilities.
- Establishing spill-reporting procedures.
- Annually, the Director of Environmental Affairs will also identify new potential spill sources, review past incidents and spills and countermeasures utilized, and integrate new construction changes into the SPCC Plan.
- Serve as a liaison between regulatory agencies and abatement contractors and the institution.

2.7.2 Notification List

In the event of an accidental spill or release, or fire which would threaten human health or the environment, the following is a list of agencies and organizations that must be notified at the earliest possible time by the Director of Environmental Affairs, at his discretion, and based upon the nature of the incident.

Regulatory Authorities

1. National Response Center
   800-424-8802
2. Lancaster County Emergency Management Committee (LC)
   610-631-6530
3. Police/Fire/Ambulance
   9-911 from campus extensions
   911 from all other phones
4. PADEP, Central Office, Harrisburg (to be contacted if the PADEP Regional Office cannot be reached)
   800-541-2050
5. Pennsylvania Emergency Management Agency (PEMA)
   800-424-7362
6. PA Fish & Boat Commission, Harrisburg (to be contacted if waters of the Commonwealth are affected)
   717-705-7800
7. PA Game Commission – Southeast Region (to be contacted if State Game Lands are affected)
   877-877-9470

Chemical Information

1. Chemtrec
   800-424-9300
2. 3E Company
   800-451-8346

Emergency Response Contractors

The following emergency response contractors may be contacted if the magnitude of the spill is beyond the capabilities of Elizabethtown College personnel.

1. Environmental Products & Services
   Glenn Grenoble
   (work) 717-564-4200
   (cell) 717-554-9624
   (24 hours) 800-787-7455

2. Bishop Associates
   Tom Robinson
   800-966-0700

Elizabethtown College has confirmed that the telephone numbers listed in the Plan are answered 24-hours a day, 7 days a week. Elizabethtown College may obtain information from those contractors regarding rate schedules and the possibility of performing a site walkthrough to familiarize their personnel with the potential needs at the facility in the event of a catastrophic release.

2.8 Reporting Procedures and Responsibilities of the Director of Environmental Affairs

Whenever there is an imminent or actual emergency situation, the Director of Environmental Affairs must immediately:

- Communicate the information to the Director of Facilities.
- Request the assistance of one of the emergency response contractors if indicated.

Whenever there is a spill or discharge, the Director of Environmental Affairs must immediately identify the character, exact source, amount, and extent of emitted or discharged materials.

Concurrently, the Director of Environmental Affairs must assess possible hazards to human health or the environment that may result from the spill or discharge. This assessment must consider both direct and indirect effects.

If the Director of Environmental Affairs determines that there has been an emission, discharge, fire, or explosion that would threaten human health or the environment, he must immediately notify the applicable local authorities. The following information shall be reported:

1. Name of the person reporting the incident.

2. Name and location of the facility.

3. Phone number where the person reporting the spill can be reached.

4. Date, time, and location of the incident.

5. A brief description of the incident, nature of the materials or wastes involved, extent of any injuries, and possible hazards to human health or the environment.

6. The estimated quantity of the materials or wastes spilled.

7. The extent of contamination of land, waters, or air, if known.

8. Corrective action and countermeasures taken, including a description of equipment repairs and replacements.

This information must be submitted to the Regional Administrator, as well as appropriate state agencies within 60 days. This report will also include:

1. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary.

2. Maximum storage or handling capacity of the facility and normal daily throughput.

3. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.

4. Any other information reasonably required by the Regional Administrator pertinent to the Plan or discharge.

During an emergency, the Director of Environmental Affairs must take all reasonable measures necessary to ensure that fire, explosion, emission, or discharge do not occur, reoccur, or spread to other materials or wastes at the installation. These measures shall include, where applicable, stopping processes and operations, collecting and containing released materials or wastes, and removing or isolating containers.

If the installation stops operations in response to a spill or discharge, the Director of Environmental Affairs must ensure that adequate monitoring is conducted for leaks, pressure buildup, etc., wherever this is appropriate.

Immediately after an emergency, the Director of Facilities must provide for treating, storing, or disposing of residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the facility.

The Director of Environmental Affairs must ensure that in the affected areas of the installation, no material or waste incompatible with the spilled or discharged residues is processed, stored, treated, or disposed of until cleanup procedures are completed. The Director of Facilities is also responsible to ensure that all emergency equipment listed in this SPCC Plan is clean and fit for its intended use before operations are resumed.

2.9 Discharge Procedures

2.9.1 Spill Control Equipment

The Facilities department at Elizabethtown College has equipment and materials that could be beneficially used in the event of an emergency. The equipment and material are regularly inspected and maintained to assure proper operation at all times. After a potential environmental cleanup, the equipment would be restored to original condition prior to resuming normal operations.

Spill Control Items

A variety of spill control items and miscellaneous tools, which could be used during a SPCC-related incident, are readily available at the College. These items can be found at the Brown Building in the warehouse and HAZMAT trailer.

- Absorbent pads and booms
- Spill absorbent granular (for absorbing petroleum spills)
- 55-gallon drums and other containers
- Brooms, shovels, buckets, gloves, and various other hand tools
- Backhoe with front end loader.

Fire Protection

Elizabethtown College is equipped with portable fire extinguishers located at strategic areas.

If a minor leak occurs at any of the petroleum storage/handling areas, absorbent material will be spread over the spill in sufficient quantity to completely absorb the spilled material. The saturated absorbent will be scooped up and placed in leak-proof containers and disposed of in an approved manner. Repairs, if necessary, will be made promptly.

Extra precautions will be taken for spills occurring during a rain event. Excessive rain may spread the spilled material over a greater area. Personnel responsible for spill cleanup operations are properly instructed in appropriate spill response procedures.

If a major oil spill occurs, facility personnel will contain the spilled material and keep it away from drainage ditches. Once adequate containment of the spill is achieved, the Director of Facilities will promptly arrange to have the oil pumped into containers or to a tank truck dispatched to the scene. After the bulk of the oil has been removed via pumping, the remaining oil will be covered with absorbent material in sufficient quantity to absorb the remaining oil. The saturated absorbent and any associated affected soil will be swept up, placed into leak-proof containers, and disposed of in a satisfactory manner.

2.9.2 Potential for Equipment Failure/Containment and Diversionary Structures

Potential leaks from the 1000 gallon UST would be underground or during filling operations. The tank has leak detection, and cathodic , overflow and spill protection. The cathodic protection is inspection every three years. The leak detection and overflow and spill protection is inspection whenever the State indicates. Any spill during the filling operations of the USTs would tend to remain in the fill area because of the curbing to the North.

Leaks from the heating oil ASTs in the SDLCs would be contained in the drip pans provided. Spills during filling operations would be controlled with the use of absorbent materials.

Spills from the 275 gallon AST at the POLE Barn would remain in the containment. Spills during filling would remain in the immediate area where is would be contained, controlled via drain plugs and cleanup.

Spills from the 300-gallon AST at the Dining Hall will remain in its containment. Spills during transfer of materials would be contained and controlled via the use of socks, absorbents and other spill materials located at the Dining Hall.

2.10 Inspections, Test and Records

A bi-annual inspection using the Aboveground Storage Tank Inspection Checklist in *Attachment 4* is conducted on the ASTs to check the condition of the tanks and note any evidence of a release. The inspections are documented and maintained at Plant Operations. Deficiencies noted during the inspection are corrected as soon as possible. The cathodic protection is checked every three years on the UST. The overflow, spill and leak protection is checked at the States request. All records of inspections, changes, releases, and corrective measures will be maintained at facilities and with the SPPC Plan.

2.11 Personnel, Training and Discharge Prevention Procedures

Employees who are involved with handling, storage and/or cleanup of oil are trained upon initial hire and at least annually thereafter. The training will include the operation and maintenance of equipment to prevent discharges, general facility operations, review of the SPCC Plan, spill response, applicable pollution control laws and rules and regulations, as well as newly developed prevention measures and changes in the regulations as appropriate. In addition, any known discharges or failures, malfunctioning components, and any recently developed precautionary measures are addressed. Documentation of the annual training will be maintained at the Human Resource Department.

2.11.1 Designated Person Responsible for Oil Spill Prevention

Joe Metro
Director of Facilities
One Alpha Drive
Elizabethtown, PA 17022

2.12 Security

The entire campus is under continuous 24-hour security patrol. Security is provided by Elizabethtown College's Security Office.

The loading/unloading connections of piping will be securely capped or blank-flanged when not in use. Also, liquid content should be emptied from the piping.

Facility lighting should be adequate to allow discovery of discharges during darkness and prevent acts of vandalism.

2.13 Tank Truck Deliveries/Loading Vegetable Oil

Product transfer operations primarily involve:

- Filling the gasoline and diesel tanks at the Brown Building and dispensing from them.
- Filling the fuel oil tanks at the SDLC(s) and transferring the fuel to the burners.
- Transferring the vegetable oil from the holding tank to a truck.
- Filling 55 gallon drums and loading the drums onto a truck.

Standard operating procedures for fuel deliveries by Worley and Obitz:

- Deliveries are made with tank wagons
- Drivers are instructed to set the manual brake, turn on the four ways, and use the on board wheel chocks

- When the Power Takeoff is activated the brake will automatically set. Fuel can not be dispensed until the brake is set
- The driver must stay with the tank wagon/nozzle while fuel is being dispensed
- Overflow protection is provided in the form of a whistle which activates when the tank is 80%/90% full
- Spill kits, booms and containments are on board the tank wagons
- Drivers are trained in hazardous materials with a two year refresher
- Worley and Obitz has a spill response van in Elizabethtown in case the spill is larger than the driver can handle on site
- If the dispensing nozzle sticks open the drivers are instructed to turn off the PTO which stops the flow of fuel

Product transfer (gasoline and diesel fuel) operations are manually initiated and are performed under the observation of the operator/vehicle user. Employees are required to remain with their vehicles while fuels are being dispensed. Those that fill the fuel tanks are also required to remain with the trucks and are appropriately trained to dispense fuel.

Prior to commencement of filling operations at the 275 gallon heating oil tanks, the truck driver will ensure that there is sufficient capacity for the volume of fuel ordered. It is the responsibility of driver to observe the filling operations and ensure that the tanks are not overfilled and that no spills occur during the filling operation. Their duties include monitoring the levels of the vessels being filled and ceasing the flow of product once a vessel level reaches high level. Also, spill control tools/materials are kept ready to contain any spill. Upon completion of the filling operation, the unloading area is visually inspected for leaks.

All hoses used for product transfer operations are visually checked prior to use. Any hose that appears damaged is not used. All hose connections to fixed piping and to delivery vehicles are inspected prior to initiating the flow of product and during product transfer operations.

Any unusual tank operating conditions are considered reportable conditions to the Director of Environmental Affairs. These conditions include the presence of water in fuel or other conditions that may be indicative of a leak condition. All suspected leaks are promptly evaluated.

2.14 Risk of Failure Evaluation

Elizabethtown College currently does not have any field-constructed aboveground containers. However, if they ever do, an evaluation for field-constructed aboveground containers undergoing repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or failure due to fracture or other catastrophe is required. It also requires such evaluation when there has actually been a discharge or failure due to the brittle fracture or other catastrophe.

Aboveground containers (except for typical in-home heating oil tanks) are required to be tested for integrity on a regular schedule and when material repairs are done (usually once every 10-years or per the tank's manufacturer's recommendation). A visual inspection will be combined with another testing technique, such as hydrostatic, radiographic, ultrasonic, acoustic emissions, or other system of non-destructive shell testing. Comparison records will be kept and include tank supports and foundations in these inspections.

Any buried piping that is installed or replaced will have protective wrapping, coating, and cathodic protection, or otherwise satisfy the corrosion protection provisions for piping in 40 CFR Part 280.

2.15 State Guideline Conformance

This Plan meets Pennsylvania State requirements.

ATTACHMENT 1

Facility Location Map

ATTACHMENT 2

Facility Plot Plans and Site Sketches

ATTACHMENT 3

Oil Storage Tank Inventory

Oil Storage Tank Inventory

ID	Location	# of Tanks	SDLCs	Capacity (gallons)	Material of Construction	Containment Protection
Y	Myer House 909 College Ave	1	Heating & Oil	275	Steel	Concrete & Drain Protection
Z	Weaver House 915 College Ave	1	Heating & Oil	275	Steel	Concrete & Drain Protection
AA	Rose Garden 346 Orange St	1	Heating & Oil	275	Steel	Concrete & Drain Protection
BB	Sauder House 520 Mt Joy St	1	Heating & Oil	275	Steel	Concrete & Drain Protection
CC	Hackman House 275 Mt Joy St	1	Heating & Oil	275	Steel	Concrete & Drain Protection
DD	White House 540 Mt Joy St	1	Heating & Oil	275	Steel	Concrete & Drain Protection
EE	International House 604 Mt Joy St	1	Heating & Oil	275	Steel	Concrete & Drain Protection
FF	Maple House 435/437 Mt Joy St	2	Heating & Oil	275	Steel	Concrete & Drain Protection
GG	Stambaugh House 831 College Ave	1	Heating & Oil	275	Steel	Concrete & Drain Protection

Miscellaneous Storage Tanks

ID	Location	# of Tanks	SDLCs	Capacity (gallons)	Material of Construction	Containment Protection
A	Dining Hall	1	Used Vegetable Oil	300	Stainless Steel	Concrete
B	Pole Barn	1	Diesel Fuel	27	Steel	Concrete
C	Brown Warehouse	3	Used Oil	55 gallon drums	Steel	Concrete
D	Brown Building	1	Gasoline	1000 gallon	Steel	Double Shell

Compactors

ID	Location	Type	Reservoir
E	Brown Building	Accurate Model 345	25 gallons
F	Dining Hall	Marathon Model RI2505C	25 gallons

Location of Oil Filled Transformers

ID	Location	KVA	Oil Capacity (gallons)	Exposure
G	Young Center	167	~50	Lawn, flower bed
H	Chapel	500	150	Lawn, drain
I	Esbenshade (Old)	300	122	Lawn, curb
J	Musser	1500	525	Lawn
K	Nicarry/Steinman	1500	414	Lawn/bushes
L	Wenger	300	245	Lawn
M	Schlosser	300	~200	Concrete/drain
N	Zug		~150	None
O	High Library	1500	395	Lawn/drain
P	Alpha Hall	225	94	Lawn/drain
Q	Thompson/Student Center	1500	375	Vault
R	Brossman Commons	500	145	To rocks along building
S	Ober	300	245	Lawn
T	Brinser	500	299	Concrete/lawn
U	Founders A/C	750	370	Lawn
V	Founders B/D	750	370	Lawn
W	Hackman N&S	500	299	Vault/wet lands
X	Athletic Fields		~100	Vault

ATTACHMENT 4

Inspection Checklists

INSPECTION CHECKLIST

Gasoline Tank – Cathodic, leak, overflow and spill protection will be inspected in accordance with state regulations. Leak protection records will be maintained at Plant Operations as will the annual inspection of the spill protection equipment. State mandated inspection reports will be maintained with the Mgr, EPA Audit in the AST & UST file.

SDLC Oil Storage Tanks – In the fall when the heating systems are being turned on and in the spring when they are being turned off the technicians will visually inspect the vent and fill lines along with the tank and legs for signs leaks, rust and failure. In addition they will insure that the heating system is operating properly. Records of these inspections will be maintained at Plant Operations.

Vegetable Oil Tank – Once a year a member of the management team at Dinning Services will inspect the vegetable oil holding tank. The visual inspection will include looking for signs of leaks, rust, and indications of potential failure in the body of the tank and legs. Records of those inspections will be maintained at Dining Services.

Diesel Fuel Tank – The technicians will inspect the tank, hose and nozzle annually for signs of rust, or failure. Results of these inspections will be maintained at Plant Operations.

Transformers – Transformer oils will be tested every other year to insure that the transformers are operating properly. Power will be disconnected from the transformers annually and the transformers will be inspected for rust, signs of leaking and generally cleaned up. Records of these inspections will be maintained at Plant Operations.

Compactors – The compactors at the Brown Bldg and the Dining Hall are on an annual maintenance contract. Deficiencies will be noted and corrected as they are found. Records of these inspections will be maintained at Plant Operations.

Elevators – Each elevator is maintained by ThyssenKrupp each month. All parts of the elevator system relating to the storage and processing of the hydraulic oil such as the holding tank and seals in the pit are inspected and deficiencies noted and corrected. Semi annually an elevator inspector from PMA does a complete inspection of each elevator, again noting deficiencies. Additionally, a pressure test is conducted on each elevator every three years. These records are maintained by Plant Operations.

ATTACHMENT 5

Certification of the Applicability of the Substantial Harm Criteria Checklist

Certification of the Applicability of the Substantial Harm Criteria Checklist

Facility Name: Elizabethtown College
Facility Address: One Alpha Drive, Elizabethtown, PA 17022

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 one 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 (as calculated using the formula in Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) 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/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Appendix E, 40 CFR 112 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 one million gallons and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Appendix C, 40 CFR 112 or a comparable formula) such that the distance 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

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 information is true, accurate, and complete.

Mike Bierbower	Director of Environmental Affairs
Name (please type or print)	Title
Signature	Date