

# Northern Illinois University

# UNDERGROUND STORAGE TANK OPERATION AND MAINTENANCE PLAN

January 2021

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# Purpose

The purpose of the Northern Illinois University (NIU) Underground Storage Tank (UST) Operation and Maintenance Plan is to ensure campus stakeholders are properly operating and maintaining USTs within their respective facilities in accordance with applicable state and federal codes. The plan provides an outline for all inspections, testing and maintenance, specific to the facility's operations, including defined intervals at which the activities shall be performed; directions on how to control and clean up routine releases or spills of regulated product; and, emergency response procedures.

# Scope

The scope of this Program is to ensure applicable state and federal code requirements are implemented at NIU facilities in regard to underground storage tank operations on campus.

# Application

This program applies to all NIU owned UST facilities under the jurisdiction of Grounds, Transportation and the Physical Plant

# **Regulatory and University Policy References**

- United States Environmental Protection Agency (USEPA) Title 40 Code of Federal Regulations Part 280
- Office of the State Fire Marshall 41 Illinois Administrative Code Parts 172 and 174-177
- NIU Spill Prevention, Control, and Countermeasure (SPCC) Plan
- NIU Facilities Management and Campus Services EH&S Policy
- NIU Health and Safety Policy

# Part 1: Plan Administration

#### 1.1 Location of the Plan

In accordance with 41 IAC 176.655(e), a complete copy of this UST Operation and Maintenance Plan, along with associated reports and logs, is maintained in the NIU Environmental Health and Safety (EH&S) Office located in the Dorland Building.

# 1.2 Plan Review

In accordance with 41 IAC 176.655(e), NIU periodically reviews and evaluates this UST Operation and Maintenance Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's UST equipment and operations, including, but not limited to:

- Commissioning of containers or tanks;
- Reconstruction, replacement, or installation of piping systems;
- Construction or demolition that might alter secondary containment structures;
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures; and,
- Use of new or modified industry standards or maintenance procedures.

Northern Illinois University commits to making the needed revisions to the UST Operation and Maintenance Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The NIU Environmental Protection Specialist is responsible for initiating and coordinating revisions to the UST Operation and Maintenance Plan.

#### **1.3 General Facility Information**

Facility Name:	Northern Illinois University
Address:	Environmental Health and Safety Department
	Dorland Building
	DeKalb, Illinois 60115
Туре:	Post-Secondary Education (University)
Owner:	Northern Illinois University
<b>Emergency Coordination:</b>	Scott Mooberry - Primary Contact
	Director, Environmental Health & Safety
	David Mannia - Class A/B Operator
	Environmental Protection Specialist

# **1.4 Facility Description**

NIU is a public research university located in DeKalb, Illinois, a midsized mid-western city of approximately 44,000 residents located one hour west of Chicago. The main campus of the university covers approximately 756 acres on the northwest side of DeKalb with a total of 64 major buildings including academic, housing, and support structures.

NIU is bordered on the south by Illinois Route 38 (Lincoln Highway), on the west by John Huber Parkway, on the north by Hillcrest Avenue, and on the east by the Kishwaukee River. A site location map is provided as **Figure 1**. NIU uses petroleum products to fuel emergency power generators and University vehicles. NIU currently operates ten active USTs as indicated in **Table 1-1**. The location of the USTs are illustrated in **Figure 2**.

Tank Facility ID#	Location	Tank Type	Product	Volume (Gallons)
1002689	Health Service Center	UST	Diesel Fuel	1,000
1002690	Psychology/Mathematics	UST	Diesel Fuel	1,000
1002691	Founders Library	UST	Diesel Fuel	1,000
1002693	Stevenson North	UST	Diesel Fuel	2,500
1002693	Stevenson South	UST	Diesel Fuel	2,500
1002694	Grant	UST	Diesel Fuel	2,500
1002702	Transportation	UST	Gasoline	15,000
1002702	Transportation	UST	Diesel Fuel	4,000
1002702	Transportation	UST	Used Oil	550
1002703	Grounds	UST	Diesel Fuel	1,000

 Table 1-1: UST Tank Identification and Location

All USTs are of double-walled fiberglass construction with spill buckets and overfill alarms. Each UST is monitored by a Veeder Root tank monitoring system which features automatic tank gauging, in-tank leak detection and electronic line leak detection. A copy of the Veeder Root Operator's Manual is provided in **Appendix A**.

# Part 2: Inspections, Maintenance, and Records

# 2.1 Certified Operators (41 IAC 176.645(a))

Northern Illinois University has 30 certified operators. A complete list of the operator's name, class, training date, and certificate expiration date is provided in **Table 2-1**. Class A/B operators are retrained and recertified every four years and Class C operators are retrained and recertified every two years by Practical American Safety Solutions, LLC (PASS). Training certificates are kept on file with the EH&S Department.

Name	Department	Class	Training Date	Expiration
Nicholas Campbell	EH&S	A/B	8/31/2020	8/31/2024
David Mannia	EH&S	A/B	7/24/2020	7/24/2024
Mark Fagerstrom	Grounds	C	8/17/2020	8/17/2022
David Holliday	Grounds	C	7/27/2020	7/27/2022
Jeff Anderson	Heating Plant	C	8/28/2020	8/28/2022
Mark Andres	Heating Plant	C	8/28/2020	8/28/2022
Adam Baie	Heating Plant	C	8/28/2020	8/28/2022
Eric Barnes	Heating Plant	С	8/28/2020	8/28/2022
Scott Betts	Heating Plant	C	8/27/2020	8/27/2022
James Collin	Heating Plant	С	8/19/2020	8/19/2022
Chris Ebert	Heating Plant	C	8/28/2020	8/28/2022
Dave Flavin	Heating Plant	С	7/31/2020	7/31/2022
Jay Foster	Heating Plant	C	9/1/2020	9/1/2022
Robert Fredholm	Heating Plant	C	7/24/2020	7/24/2022
Scott Galto	Heating Plant	С	8/30/2020	8/30/2022
Steve Greer	Heating Plant	C	8/31/2020	8/31/2022
Ed Hall	Heating Plant	С	9/9/2020	9/9/2022
Joe Hoiness	Heating Plant	C	7/31/2020	7/31/2022
<b>Richard Mathesius</b>	Heating Plant	С	8/3/2020	8/3/2022
Steve Peerboom	Heating Plant	С	8/28/2020	8/28/2022
Bradford Smith	Heating Plant	С	9/3/2020	9/3/2022
Joe Spickerman	Heating Plant	С	8/31/2020	8/31/2022
Justin Vest	Heating Plant	С	8/31/2020	8/31/2022
Tim Ferris	Transportation	C	7/24/2020	7/24/2022
Christopher Gilbert	Transportation	C	7/24/2020	7/24/2022
Erick Koenig	Transportation	C	10/27/2020	10/27/2022

#### **Table 2-1: Certified Operators**

Name	Department	Class	Training Date	Expiration
John Norris	Transportation	С	8/10/2020	8/10/2022
Anthony Sharp	Transportation	С	8/4/2020	8/4/2022
Brad Smith	Transportation	С	10/26/2020	10/26/2022
Michael Storandt	Transportation	C	7/28/2020	7/28/2022

# 2.2 Minimum Training Requirements (41 IAC 176.625)

#### 2.2.1 Class A Operators

The Class A operator is primarily responsible for the operation and maintenance of a UST system. They assist the owner by ensuring that the UST systems are properly installed, maintained and promptly repaired. The Class A operator: manages resources and personnel; maintains compliance with federal, state and local regulations; ensures that required records are kept and made available to inspectors; and, ensures that operators at the facility are trained to respond to releases, spills and other emergencies.

#### 2.2.2 Class B Operators

Class B operators are usually facility managers and are responsible for day-to-day operation, maintenance and recordkeeping at the UST facility. Class B operators will generally be responsible for: meeting release detection recordkeeping and reporting requirements; meeting release prevention recordkeeping and reporting requirements; ensuring that equipment complies with industry standards; and, training personnel to properly respond to emergencies caused by releases or spills.

#### 2.2.3 Class C Operators

Class C operators are the employees of the UST facility. Class C operators are responsible for: controlling or monitoring the dispensing and sale of regulated substances; monitoring fuel delivery to the tanks; and, are usually the first responders to emergency situations.

In accordance with 41 IAC 176.645(b), Class C operators must also be provided with sitespecific training that includes: procedures for overfill protection during delivery of regulated substances; operation of emergency stops; appropriate responses to all alarms; reporting of leaks, spills and releases; and, notification instructions and contact information in the event of an emergency. A written copy of the *Class C Operator Emergency Response Procedure for USTs* is located at each UST monitoring system and included in **Appendix B**.

# 2.3 Inspections

#### 2.3.1 Certification of Compatibility

All UST systems must undergo a *One-Time Certification of Compatibility* in accordance with 41 IAC 175.415. All parts of the UST system must be documented to be compatible with gasoline blends over E10 and diesel blends over B20 at facilities where higher concentration blended fuels are stored and dispensed.

Owners and operators must maintain records in accordance with 41 IAC 176.430 for as long as the UST system is used to store the regulated substance.

#### 2.3.2 Monthly Inspections

In accordance with 41 IAC 176.655(b), the Class A/B Operator performs walkthrough inspections of each UST at least once every 30 days. The monthly inspections must be recorded on the OSFM's *30 Day Walkthrough Inspection Report*. A copy of the inspection report is provided in **Appendix C**. The monthly inspections are designed to incorporate all applicable elements and cover the following key features:

- Observe the tank fill and discharge pipes for signs of poor connection that could cause a discharge;
- Inspect the tank vent for obstructions and proper operation;
- Verify the proper functioning of overfill prevention and interstitial space monitoring systems;
- Document a status printout from the Veeder-Root automatic tank gauging system for each liquid sensor alarm;
- Check the integrity of manhole and sump covers for cracks, holes or bulges;
- Inspect all containment sumps and spill buckets for visual damage, the presence of regulated substances or any indication that a release may have occurred, and ensure that they are free of water, product and debris;
- Inspect groundwater monitoring wells for presence of petroleum odor or visible sheen, if applicable;
- Inspect emergency shutoffs, dispensers, hoses, breakaways, hardware, visible product piping, and other equipment for signs of deterioration, leaks, corrosion, and maintenance deficiencies;
- Verify that all required signs are fully visible and all communication systems are in place and operational; and,
- Check the emergency response equipment inventory and restock as needed.

Any deficiency identified during the visual inspection must be corrected promptly. Documentation of adequate response measures for all deficiencies identified during the visual inspection are maintained together with the completed inspection logs.

In addition to response measures provided as a result of the monthly inspections, discharges that result in a loss of liquid from tank walls, piping, or any other component must be

repaired as soon as possible to prevent a larger spill or a discharge to the sanitary or storm sewer system. Pooled oil, contained liquids with an oil sheen, or stained soil must be immediately reported to the Class A/B Operator.

Written monthly inspection records are signed by the Class A/B operator and maintained with this UST Operation and Maintenance Plan for a period of two years.

#### 2.3.3 Annual Inspections

Annual inspections and testing are conducted by the Class A/B operator and an OSFM licensed UST contractor, where applicable. Annual inspection and testing activities include:

- Inspection and testing of the emergency electrical shutoff switches in accordance with 41 IAC 175.210(i).
- Inspection and functionality testing of the liquid sensor alarms used for interstitial monitoring of tanks in accordance with 41 IAC 175.630(f)(2).
- Inspection and functionality testing of the liquid sensor alarms used for interstitial monitoring of piping in accordance with 41 IAC 175.640(b)(1)(A).
- Submitting the signed annual *Financial Responsibility Statement* to the OSFM in accordance with 41 IAC 176.220.

Annual inspection records are maintained with this UST Operation and Maintenance Plan for a period of two years. Copies of the annual inspection forms are provided in **Appendix D**.

#### 2.3.4 Three Year Inspections

Three-year inspections and testing are conducted by an OSFM licensed UST contractor. Three-year inspection and testing activities include:

- Test spill bucket. Spill bucket containment testing is required in accordance with 41 IAC 175.405(b)(2), unless the spill bucket is of double wall construction and monitored every 30 days.
- Inspect overfill prevention equipment. Three-year inspections of all overfill prevention equipment is required in accordance with 41 IAC 175.405(c). If there is more than one type of overfill prevention equipment present, all must be inspected.
- Test piping containment sump. Any containment sump used for interstitial monitoring of piping must be tested every 3 years in accordance with 41 IAC 175.410(1)(2), unless the sump is of double wall construction and monitored every 30 days.

Three-year inspection records are maintained with this UST Operation and Maintenance Plan for a period of three years.

# **Part 3: Emergency Response Procedures**

# 3.1 Security

The Department of Police and Public Safety (University Police) provides security services for the DeKalb campus. The University Police utilize squad cars and patrolmen to provide such services on a 24/7 basis. Outdoor lighting is provided to adequately illuminate the storage tank, dispenser, generator, and other oil handling areas. The Class A/B Operators have provided instruction to the University Police and Class C Operators regarding awareness of spills, emergency response procedures, and discouraging fuel theft or possible sabotage. Both the University Police and Class C Operators have access to this UST Operation and Maintenance Plan for reference purposes.

# 3.2 Oil Transfer Procedures

All of NIU's loading and unloading procedures meet the minimum requirements and regulations established by the United States Department of Transportation (USDOT). Owners or operators of USTs are legally responsible for ensuring that overfills do not occur during fuel deliveries (41 IAC 176.340). Bulk storage tank filling operations must be performed in such a way to ensure that a tank is not overfilled.

All fuel suppliers must comply with USDOT regulations in 49 CFR 177 and University standard operating procedures. Additional spill prevention procedures that are not noted below may be used per the fuel supplier's Spill Prevention, Control and Countermeasure Plan. The supplier must ensure that the driver understands the site layout, protocols for entering the facility and unloading product, and has the necessary equipment to respond to a discharge from the vehicle or fuel delivery hose. Similar precautions are undertaken during the removal of used oils from the facility.

The UST filling operations are performed by qualified suppliers trained in proper discharge prevention procedures. *All transfers must be attended by NIU Class C Operators, and personnel from the fueling supplier, so that spills from the fill port or the delivery truck would be discontinued quickly and contained before impacting the environment.* Transfer operations are performed in accordance with the following minimum procedures, with more specific protocols outlined in the *NIU General Fuel Transfer Procedures* checklist provided in **Appendix E**:

- All oil transfer operations occur above ground and in plain sight;
- All facility oil transfer operations occur during daylight hours, or under sufficient illumination to be capable of observing any spillage;
- At least one NIU Class C Operator is present and observes the transfer of oil during the transfer process;
- Where oil transfer is to occur near a surface drain or waterway, adequate spill containment, diversion, or absorption equipment must be readily available at the location to prevent any spillage from reaching the drainage way;

- The driver and/or NIU Class C Operator shall immediately report any size release of oil to an A/B Operator and, if necessary, to the NIU Police Department;
- Any release of oil must be prevented from reaching a storm sewer, sanitary sewer or waterway, and mitigation activities initiated as soon as practicable;
- Drivers are required to remain on-site where the spillage occurred until approved for departure by the University Police or Class A/B Operator.

Although NIU implements preventative maintenance programs and site-specific unloading procedures that are designed to minimize the potential for spills, it is possible that a release from tank vents, fill ports or from the tank truck could occur. In the event of a spill as a result of transfer operations, the fuel supplier and the NIU Class C Operator overseeing the unloading event will immediately implement oil spill response procedures outlined in **Section 3.3** of this plan, and in accordance with the *NIU Spill Prevention, Control, and Countermeasure (SPCC) Plan.* 

If a release occurs during transfer operations and it is found that NIU Class C Operators were not onsite to observe the transfer, the department responsible for ordering the fuel may be held accountable for the costs associated with the remediation of the release.

# 3.3 Spill Response Procedures

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled release of oil to groundwater, surface water or soil is prohibited by state and federal laws or regulations and must be addressed through the *NIU SPCC Plan*. Immediate action must be taken to control, contain, and recover any released or spilled petroleum product or used oil. In general, the following steps are taken by the Class C Operator:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down the source of the release or discharge to stop the flow;
- Contain the discharge with sorbents, berms, trenches, sandbags or other material;
- Obstruct the discharge from accessing surface waterways, storm sewers or sanitary sewers by covering catch basins or curb drains by trenching or creating diversion ditches with sorbents or soil;
- Notify University Police and contact a Class A/B operator;
- A Class A/B Operator will contact regulatory authorities and the appropriate response organization (if required or necessary);
- Collect and dispose of recovered product and contaminated debris according to applicable regulations;
- Restock any expended spill control equipment; and,
- Make any necessary follow-up reports, and evaluate the incident and response to determine if any changes or improvements are needed to personnel training, response procedures or equipment.

For the purpose of establishing appropriate response procedures, discharges are classified as either "minor" or "major," depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in **Appendix F.** The list is also posted at prominent locations throughout the facility. A list of spill response materials at the facility is included in **Appendix G**.

#### **3.3.1** Response to a Minor Discharge

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where the release is contained within or adjacent to the secondary containment device or structure and the quantities are relatively small. Characteristics of a *minor* discharge include the following:

- The quantity of product discharged outside of the secondary containment is small (e.g., less than 25 gallons of oil released, and oil does not reach or threaten to reach a waterway, drain or sewer inlet);
- Spilled material is easily stopped, contained, and controlled at the time of the discharge;
- The spill is localized near the source;
- Discharged material is not likely to reach water (or sewer drains) or migrate off University property;
- There is little risk to human health or safety; and,
- There is little risk of fire or explosion.

Minor discharges are typically cleaned up by trained NIU EH&S staff and normally reporting to state or federal EPA, or City authorities is not required or necessary. The following guidelines apply:

- Immediately notify your supervisor, the Environmental Protection Specialist or a Class A/B operator, or if in doubt as to the severity of the release, contact the University Police at 911. The University Police serve as the central notification point for these, and other emergencies and they will notify the necessary parties;
- Don any necessary personal protective equipment and retrieve the necessary spill control materials or devices;
- Locate and stop the source of the release, if deemed safe to do so;
- Contain the discharge with the appropriate discharge response materials and equipment;
- Place discharge debris into properly labeled waste containers. The material disposal arrangements will be made by the NIU Environmental Protection Specialist and determine the needs for post-cleanup environmental assessment of the location; and,
- The Environmental Protection Specialist, or his designee, will complete a *Discharge Notification Form* (**Appendix H**) as required by the NIU *SPCC Plan*.

#### **3.3.2** Response to a Major Discharge

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, or when reporting to regulatory agencies is required, such as when:

- The release quantity is large enough to spread beyond the immediate discharge area and cannot be rapidly or safely controlled;
- The quantity discharged may discharge or flow beyond the NIU property boundary;
- The quantity released exceeds 25 gallons, or results in a release to the environment that equals or exceeds its reportable quantity (RQ);
- The discharged material enters or will enter a surface waterway, drain or sewer;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There has been, or is a danger of, a fire or explosion.

In the event of a *major* discharge, the following guidelines apply:

- All persons, other than response personnel, must immediately vacate the discharge location via the established exit routes and move to designated staging areas at a safe distance from the discharge;
- The supervisor, senior staff or faculty, or any other party, should contact the University Police (911) and the EH&S Department (753-0404) for notification of the appropriate response parties;
- Designated EH&S staff have authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge;
- Designated EH&S staff will call the spill response and cleanup contractor listed in the Emergency Contacts list in **Appendix F** if their assistance will be needed;
- Designated EH&S staff must immediately contact the National Response Center (NRC) and the Illinois Emergency Management Agency (IEMA) listed in the Emergency Contacts list in **Appendix F** when necessary;
- Designated EH&S staff coordinates cleanup with assistance from a cleanup contractor or other response organization as necessary; and,
- Designated EH&S staff, will complete a *Discharge Notification Form*, or an incident report, as required by the NIU *SPCC Plan*.

# 3.4 Discharge Notification

In accordance with 41 IAC 176.340, any size discharge of oil that may be harmful to public health or welfare of the environment must be reported immediately to the NRC and IEMA. Discharges of oil in quantities that may be harmful include those that:

- Violate applicable water quality standards;
- Causes a film or sheen upon, or discoloration of the surface of the water or adjoining shorelines;

- Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines; or,
- Result in a release to the environment that exceeds 25-gallons.

Immediate telephone notification is also required if an incident or accident involving a hazardous material occurs which results in:

- A release equal to or exceeding the reportable quantity (RQ) of a hazardous substance;
- A member of the general public is killed;
- A member of the general public receives injuries requiring hospitalization;
- An authorized official of an emergency agency recommends an evacuation of an area by the general public;
- A motor vehicle has overturned on a public highway; or,
- Fire, breakage, release, or suspected contamination occurs involving an etiologic agent;

A separate notification must be made immediately to the Normal Drainage District, the City of DeKalb and DeKalb County MS4 coordinators, and/or the DeKalb Sanitary District in the event of a release reaching any waterways, storm or sanitary sewers.

A summary sheet is included in **Appendix H** to facilitate reporting. The person reporting the discharge must provide the following information and should try to obtain this information during initial assessment of the spill. However, any required reporting of the spill to government entities should not be delayed while attempting to accurately obtain all of this information:

- Name, location, organization, and telephone number
- Name and address of the party responsible for the incident
- Date and time of the incident
- Location of the incident
- Source and cause of the release or discharge
- Types of material(s) released or discharged
- Quantity of material(s) released or discharged
- Danger or threat posed by the release or discharge
- Number and types of injuries (if any)
- Media affected or threatened by the discharge (i.e., water, land, air)
- Weather conditions at the incident location
- Any other information that may help emergency personnel respond to the incident

Contact information for reporting a discharge to the appropriate authorities is listed in **Appendix F**.

# 3.5 Waste Disposal

As a major research institution, NIU has a chemical waste disposal program and is listed with the IEPA as a Small Quantity Generator (SQG). Wastes resulting from a discharge response, including used absorbents, will be containerized in impervious bags, drums, buckets or covered roll-off containers. The Environmental Protection Specialist, or his designee, will characterize the waste for proper disposal and ensure that it is removed from the facility for off-site treatment, disposal or recycling at an approved facility. In the interim, the wastes should be stored in a secure location that is afforded secondary containment or controls.

# 3.6 Cleanup Contractors and Equipment Suppliers

Contact information for specialized spill response and cleanup contractors is provided in **Appendix F**. These contractors have the necessary equipment to respond to a discharge of oil that may affect a waterway through a release to the storm or sanitary sewers in the vicinity, or for other major spills.

Spill kits are also available at the following locations:

- Transportation Department garage
- Grounds Department garage
- Faraday Hall loading dock
- Montgomery Hall loading dock
- Hazardous waste storage facility
- UST supplied generator rooms
- University vehicle

An inventory of response supplies and equipment at each of the above locations is provided in **Appendix G** of this Plan. A ready supply of spill response equipment and absorbents is also maintained in the NIU Environmental Protection Specialist's University vehicle to allow quick response. APPENDIX A

**APPENDIX B** 

**APPENDIX C** 

APPENDIX D

APPENDIX E

**APPENDIX F** 

APPENDIX G

**APPENDIX H** 

FIGURES