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Environmental Health and Safety

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Guidelines for the Identification of Oil Storage Containers and Oil-Filled Equipment

Purpose: The purpose of these guidelines is to identify existing and planned oil storage containers and oil-filled equipment that hold 55-gallons or more of any type of oil, in order to assess the potential for spills and releases, and to incorporate the containers/equipment into the various safety and training requirements of the Storage Tank Management Program.

Oils are stored at various locations throughout the University such as in maintenance facilities and shops, testing laboratories, landscape shops, food preparation areas, and agricultural operations. Oils that are stored improperly may be released into the environment. By identifying these sources, good practices, such as training, storage, and inspections can be used to help reduce the risk of spills and releases, and to mitigate the environmental impacts of spills and releases. In addition, there are regulatory requirements that must be satisfied.

Reference: The University is required by the Environmental Protection Agency (40 CFR 112) and by PaDEP (25 Pa Code Chapters 91 and 245, and "Guidelines for the Development and Implementation of Environmental Emergency Response Plans) to ensure that oils are properly handled, personnel are trained, and that spills and releases are cleaned up.

Definition: An oil is defined by the EPA as "an oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil."

Procedure: All oil storage containers and oil-filled equipment containing 55-gallons of oil or more are required to be identified to the Department of Environmental Health and Safety (EHS). Future oil storage containers and oil-filled equipment must be identified to EHS before being placed into service. Facilities storing oil in these quantities will be required to have a Spill Prevention, Control, and Countermeasures (SPCC) Plan, a Preparedness, Prevention, and Contingency (PPC) Plan, or both. The facilities will need to meet storage requirements (secondary containment and spill kits), meet training requirements (initial and annual refresher), perform inspections, and be subject to audits.

Responsibilities:
EHS is responsible for oversight of the Storage Tank Management Program and for ensuring that oils are handled properly, at risk storage equipment/containers are removed/replaced, and that Penn State meets all regulatory requirements with respect to oil storage.

Administrative units are responsible to ensure that all containers meeting the requirements listed above have been identified to EHS.

Safety officers are responsible for establishing a mechanism for determining if areas under their jurisdiction have oil storage containers or oil-filled equipment that meets the requirements given above, and for annually reviewing their areas to determine if any new equipment or containers have been added.

Supervisors, including principle investigators, are required to notify EHS in the event that their oil storage changes prior to the change occurring, and to annually review their oil storage to determine if their SPCC/PPC Plan is accurate. They must ensure that their area meets the requirements of the SPCC/PPC Plan for proper oil storage, personnel training, container/equipment inspections, spill/release reporting, and clean-up.

Individuals that work with oil are required to be trained annually in good oil handling practices, and to know how to respond to oil spills and releases.